

----- Message from "David W. Nunn" <nunney@sympatico.ca> on Fri, 18 Mar 2011 14:12:49 +0000 -----

**To:** "mostefficient@energystar.gov"  
<mostefficient@energystar.gov>

**cc:** Steve NRCan Hopwood <shopwood@NRCan.gc.ca>

**Subject:** New proposals for higher performance levels

I support your ideas for a second tier of energy levels on products. I am surprised that you do not include windows and doors in that proposal. They are the method where most energy is lost.

Here in Canada, a change is proposed for approximately 2012.

Unfortunately, rather than using the same principle as you indicate for the US ENERGY STAR program, the direction of the Canadian program, is to change our excellent existing program, (as of October 2010), to a further change in various aspects for a company to become certified. The suggested changes will have an effect on every window, door and skylight produced, by increasing the ER requirements to reach a specific zone, to requiring certification and testing by every company and by significantly increasing the cost to belong in the program. The changes are being brought in an effort to increase every fenestration products energy saving for homeowners.

The resultant effect will be for the majority of the existing fenestration companies to drop out of the program as the cost to participate will be exorbitant and at no gain to the company. This loss of all of the smaller fabricators, will therefore also reduce the total energy saved in Canada. More homeowners will be buying the "also ram's" who produce a good product at a lower cost but do not have ENERGY STAR certification. The only companies that will be in the program are the larger companies who can afford the "Membership" and testing fees.

As I mentioned, I totally support the two level program that you are considering. This two level direction would work well in Canada and I urge you to discuss the program with the Canadian powers that make our program work.

Please keep me informed on the progress.

**Steve Hopwood.** FYI.

Regards,

Dave

David W Nunn. CIM., P.Mgr.

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PS. I am a consultant to and have been involved in, the fenestration industry for more than 34 years. I have certified and regularly work with more than fifty window and door companies. All, without exception, are very satisfied with the present program and who are against the proposed changes to the Canadian program. They see no benefit to their company, their consumers or to the government energy saving efforts.