



To: Richard Karney

From: Martin Koppers

Date: 3/13/03

Subject: Proposed Energy star criteria

Alenco strongly opposes both of the proposed changes to the Energy Star Program. Both proposals effectively exclude aluminum frame windows from the 2000 – 3500 HDD zone.

Aluminum windows have, and will continue to provide energy efficiency that not only exceeds the IECC code, but the Energy star criteria as well.

As an example, the current baseline product for the Dallas / Ft. Worth area (2407 HDD) is an aluminum frame window with low solar gain low e glass. These products typically have U-Values of 0.60 with a SHGC of 0.35. These numbers are well below the current Energy Star criteria of .75 / .40. In fact, if you compare the proposed .40 / .40 proposal for the area, you will find that these products reduce the cooling load by an additional 4.7% due to the lower SHGC (resfen ver. 3.1). This analysis applies to all of the resfen cities between 2000 and 3500 HDD.

We propose that Energy Star adopt the following criteria.

Keep the current zone divisions

Northern Zone	< 3500HDD	0.35 U-Value / any SHGC
Central Zone	3500 – 5999 HDD	0.40 U-Value / 0.35 SHGC
Southern Zone	> 6000 HDD	0.60 U-Value / 0.35 SHGC

In order to achieve a .40 U-Value, you need a vinyl frame and low e glass. Vinyl windows have wide frame profiles that contribute to lower SHGC numbers, and when used in combination with most low e products, will achieve a .35 SHGC or below.

The same is true of aluminum products, you need low e glass to achieve the .60 U-Value, the SHGC is generally around 0.35.

This proposal meets the requirement that Energy Star products provide energy efficiency that is above the current Federal codes, and does not exclude any one type of frame material from the market.

Alenco offers a strong value proposition to the consumer with our energy efficient aluminum frame windows, and we will continue to provide these products to the market. However, if the current proposal succeeds, we will end our relationship with Energy Star in favor of traditional market forces. Namely, that energy saving products with rational paybacks will prevail.