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March 28, 2003

Dear Mr. Karney,

I am writing in response to your request for comments on the proposed changes to the ENERGY STAR Windows program. The Alliance to Save Energy promotes energy efficiency worldwide to achieve a healthier economy, a cleaner environment and energy security. The Alliance has been a supporter of the ENERGY STAR Program since its inception in 1992. The comments provided herein are those of the Alliance to Save Energy. We point out that the Efficient Windows Collaborative, an Alliance program that advises consumers of their best efficient window choices for local conditions, takes no position on either alternative.

We believe that there are significant opportunities to improve energy efficiency in residential buildings through energy efficient windows. Therefore, we have carefully reviewed the two alternatives for changes to the energy performance criteria for the windows program proposed by the U.S. Department of Energy. The DOE report, "An Evaluation of Alternative Qualifying Criteria for ENERGY STAR Windows: February 2003" provides an insightful technical analysis of both the 3-zone and 4-zones options. We have weighed these alternatives against the goals and purpose of the ENERGY STAR Program.

The Alliance expresses our support for the 3-zone alternative. This alternative offers the potential to reduce cooling demand—and consequently to reduce greenhouse gas emissions and to provide summer peak energy savings. In addition, the simplicity of the 3-zone alternative is beneficial for consumers. As discussed later, we feel that the energy savings analysis may contain sufficient flaws to make the decision on the zones impractical solely on the basis of projected energy savings. However, we believe that the 3-zone alternative will promote low solar heat gain window products in cooling-dominated climate zones where this is important.

Therefore, we feel that the environmental benefits of the 3-zone alternative provide the better choice. The purpose of the ENERGY STAR program as stated on the program's web site is to provide a "voluntary labeling program designed to identify and promote energy-efficient

products to reduce greenhouse gas emissions.” Thus the environmental benefits are an important element of the ENERGY STAR program. Support for the 3-zone alternative is consistent with the Alliance to Save Energy’s goals of working to achieve a cleaner environment and energy security through energy efficiency.

In the future, when DOE next updates the criteria for the ENERGY STAR Windows program, we recommend that the analysis take into account the relative market share of all window products that satisfy the ENERGY STAR criteria in each climate zone. The current analysis may not correctly estimate the energy savings potential. This is because window products meeting minimal U-values (e.g. 0.35) can have significant variations in SHGC among different product types. Because the range of available SHGC products is un-weighted by market share, selection of a single product type to represent all windows is likely to obscure the results.

There are also commercial competition issues related to the choice of alternatives. The success of the voluntary ENERGY STAR program has caused concern for some manufacturers that pyrolytic technology will become non-competitive in the marketplace if the 3-zone alternative is adopted. It is important to note that there are other government-sponsored programs working to create demand for this and other efficient window technologies. One of these programs is the Efficient Windows Collaborative which educates consumers about all of the different energy efficient technologies available in the market, and helps consumers to make the best choice based on a host of considerations including climate, design, energy prices, etc.

We believe that these pyrolytic window products will continue to be competitive and serve consumers in their best applications in the northern climate zones. In conclusion, we believe the 3-zone alternative provides the best accommodation of continued market choice, energy savings and environmental benefits.

Sincerely,

Harry Misuriello  
Director, National Programs