

February 14, 2013

Doug Anderson
ENERGY STAR® Program
U.S. Environmental Protection Agency
Washington, DC 20460

Dear Mr. Anderson,

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the *ENERGY STAR® Draft 2 Version 6.0 of the Windows, Doors, and Skylights Product Specification* released by the Environmental Protection Agency (EPA) on January 7, 2013.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR® Program. CEE members are responsible for ratepayer-funded efficiency programs in 45 US states and eight Canadian provinces. In 2011, CEE members directed over \$7.8 billion of energy efficiency program budgets in the two countries. CEE's Members work to strengthen ENERGY STAR as a platform for energy efficiency across North America.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

Support for Cost Effective Air Leakage Requirements

CEE continues to see potential value in adding air leakage requirements to the ENERGY STAR Version 6.0 criteria, and harmonizing these levels with the International Energy Conservation Code in order to reduce the compliance burden on manufacturers and promote consistency in the market. In addition, CEE agrees that collaborating with the National Fenestration Rating Council to establish consistent certification and labeling will contribute to beneficial alignment between existing efforts and resources. CEE supports the proposed air leakage rating values and the language of the clarified test method, however, we have no data with which to assess the impact of these requirements in terms of costs. We are acutely aware that EPA must not lose sight of cost as an input to its consideration for the addition of air leakage requirements. For this reason, we raise the issue of air leakage as it is of interest to program administrators for the

reasons outlined above, and support EPA's efforts to strike an appropriate balance between cost and performance considerations.

Installation Instructions Not Sufficient to Achieve Quality Installation

CEE applauds EPA's continued effort to address the critical subject of quality installation with respect to ENERGY STAR windows, doors, and skylights and supports the inclusion of instructions to installers as a first step to an overall strategy to address quality installation. As noted in the *Version 6.0 Draft 1 Criteria and Analysis Report*, poor installation of products can lead to air infiltration, water leakage, reduced functionality of the unit, accelerated product decline, and mold problems. It has been CEE's experience with programs promoting HVAC quality installation that a multi-faceted strategy is needed to define and influence quality installation in the marketplace. CEE offers this experience to highlight its belief that it will be important to identify strategies that are necessary and sufficient to ensure quality installation of these ENERGY STAR products, such as enhanced consumer education, contractor training, and certification standards. Accordingly, CEE looks forward to participating in continued discussions regarding strategies to address delivery of quality installation for these product categories in order to ensure that all objectives are met.

Steps Needed to Avoid Misapplication of High-Gain Products in Northern Climates

CEE supports EPA's proposal to achieve ENERGY STAR recognition for high-gain products in the Northern Climate Zone through equivalent energy performance pathways. However, the expected energy performance of these products is achievable only in applications where direct exposure to the sun is afforded (i.e., East, South, or West facing windows). EPA should therefore consider what measures will be necessary and sufficient to mitigate the risk of inappropriate application of higher SHGC products, such as in the North facing façade of a home. CEE believes this will be important both in terms of achieving the intended energy savings, and in avoiding negative consumer experiences with ENERGY STAR products where a tradeoff between U-factor and solar heat gain coefficient (SHGC) may exist. As discussed above, a multi-faceted quality installation program may be a critical element for minimizing this risk to the brand promise of ENERGY STAR.

Support for January 1, 2014 Effective Date

CEE supports an effective of January 1, 2014 for this specification. As noted in the *Version 6.0 Draft 1 Criteria and Analysis Report*, the current market share of Version 5.0 qualified windows,

doors, and skylights is at 81%, 71%, and 70% respectively. These levels of market penetration are too high for some CEE members to effectively leverage ENERGY STAR as a program platform. Delaying the introduction of Version 6.0 simply prolongs this situation. In addition, EPA's research indicates that many models already meet the energy efficiency requirements outlined in the Version 6.0 Draft 2 specification, and therefore alleviates concerns about limited product availability as these represent products that would, by definition, be available in the market on the 2014 effective date.

Thank you for your consideration of these comments. CEE strongly supports ENERGY STAR and appreciates the opportunity to offer the comments provided in this letter. Please contact CEE Program Manager Alice Rosenberg at arosenberg@cee1.org or 617-337-9287 with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Ed Wisniewski". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Ed Wisniewski
Executive Director