

NYSERDA**New York State Energy Research and Development Authority**Vincent A. DeIorio, Esq., *Chairman*

Toll Free: 1 (866) NYSERDA

www.nysERDA.org • info@nysERDA.org

March 28, 2003

Mr. Richard H. Karney, P.E., Manager
 ENERGY STAR® Program
 Building Technologies Program
 U.S. Department of Energy
 Energy Efficiency & Renewable Energy
 1000 Independence Avenue, SW
 Washington, D.C. 20585-0121

Dear Mr. Karney:

I am writing in support of ENERGY STAR® Standards for windows, proposed in May 2002 based on a three-zone map, focusing on maximizing cooling energy savings. As you are aware, the New York State Energy Research and Development Authority has become a significant partner with ENERGY STAR® in appliances and homes and is aggressively promoting the ENERGY STAR® brand across a range of product categories.

We support the voluntary nature of the ENERGY STAR® program, and believe that as voluntary programs, they should set the highest standards possible to encourage the market to move towards higher performance. At the same time, we also support competition and variety of technologies to meet performance goals. Therefore, we are in agreement with the recommendations of the Alliance to Save Energy and the American Council for an Energy-Efficient Economy and support the Proposed Final Criteria for the Central Region (2,000-6,000 degree days) of a U-factor of .40 or less, and a Solar Heat Gain Coefficient (SHGC) of .40 or less. The more aggressive SHGC standard will provide greater peak load savings to New York, which is a significant concern to our state. These standards strike a reasonable balance between performance and availability.

Thank you for this opportunity to comment on these proposed standards.

Sincerely,



Peter R. Smith
 Acting President

Main Office
 Albany
 17 Columbia Circle
 Albany, NY 12203-6399
 Toll Free: 1 (866) NYSERDA
 Phone: (518) 862-1090
 Fax: (518) 862-1091

West Valley Site
 Management Program
 10282 Rock Springs Road
 West Valley, NY 14171-9799
 Phone: (716) 942-4387
 Fax: (716) 942-2148

New York City
 485 Seventh Ave., Suite 1006
 New York, NY 10018
 Phone: (212) 971-5342
 Fax: (212) 971-5349

Buffalo
 617 Main Street, Suite 105
 Buffalo, NY 14203
 Phone: (716) 842-1522
 Fax: (716) 842-1835