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Director of Technical Services
Flat Glass Products

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Mr. Richard H. Karney, P.E., Manager
ENERGY STAR Program
Building Technologies Program
Department of Energy
Washington, D. C.

Dear Mr. Karney:

We at PPG are pleased with the opportunity to provide comments on the potential revisions to the ENERGY STAR criteria for window, door and skylight products. As a large supplier of energy-saving flat glass products to the companies that produce these products, we have a keen interest in expanding public understanding and use of such glass products. Moreover, as a founding member of the ENERGY STAR program we are pleased to see the program evolve and respond to market place changes, new technology any new opportunities.

We had previously commented, in September of 2001, on proposed revisions to the ENERGY STAR criteria. At that time we were, as we are now, particularly concerned with and opposed to, the consideration of, a one-zone or even two-zone approach. Common sense, and plenty of analyses, suggests that energy efficient AND cost effective windows are not the same for Miami and Minneapolis. We are most pleased, therefore, that your alternatives have NOT gone down the path towards one climate zone.

Your February 11 letter captures succinctly, the difference between the three and four zone alternatives, and points out a case for either. And there is certainly an abundance of data and contrasting views, which, depending on assumptions, will be presented in support of one alternative or the other. Our preference is for the four-zone alternative which with the inclusion of a "north central" region, recognizes a climatic zone where heating considerations predominate, but cooling is (seasonally) an issue as well and a modest SHGC is appropriate. Certainly though, if you elected the three-zone alternative, we would support that as well.

Going forward we would like you to consider that future ENERGY STAR criteria revisions, and embellishments to the structure of the program attempt to push the industry envelope towards improved energy conserving products. By and large, combinations of prevailing technology, products and market patterns, bind the current criteria. While there are probably no "silver bullets", we believe that future product development and creative combinations of existing

components---glass substrates, coatings, IG spacer systems, and sash materials and designs, can be given greater public visibility and incentive through the ENERGY STAR program. Consider for example, an ENERGY STAR “North Plus Window” with u-value criteria of .25, or a “South Plus Window” with a SHGC of .25. Targets such as these, with energy savings of 25% or more above today’s norm should constantly be our goal, and we believe the ENERGY STAR program can be a leader in this evolution.

Thank you for the opportunity to express our views.

Very Truly Yours,

Albert F. Lutz, Jr.
Director, Technical Services
Flat Glass