



PILKINGTON

The Honorable David Garman, Assistant Secretary
Office of Energy Efficiency & Renewable Energy
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585
FAX: (202) 586-5954

June 13, 2002

Re: ENERGY STAR Windows Criteria Proposed Changes

Dear Mr. Garman,

The Department of Energy, Office of Energy Efficiency and Renewable Energy, should adopt the 4-zone alternative proposed criteria for the ENERGY STAR Windows program. This map saves more overall energy, maintains competition in the marketplace, and allows for lower home heating costs for consumers. I further oppose the 3-zone proposed criteria as it will have a detrimental impact on Pilkington North America's (Laurinburg, NC or Ottawa, IL) facility, where I am employed.

The reasons that I oppose the 3-zone proposal:

1. This is the exact same proposal your agency was compelled to withdraw last year after numerous objections were raised by Members of Congress and stakeholders in the program.
2. The proposed criteria will create a monopoly in the marketplace by eliminating the use of our pyrolytic Low-E glass. The elimination of this technology will reduce customer's choice on energy efficient products and increase consumers home heating costs. This is not appropriate at a time when home heating oil and natural gas are at record high levels
3. The 3-zone proposal saves less energy than the alternative proposal as evidenced by your own supporting documentation.
4. Your support for the 3-zone option is primarily based upon concern with summer peak energy savings. Yet there is currently a substantial reserve margin in the peak energy market, and this reserve margin is projected to nearly double by 2006

I believe that the ENERGY STAR Windows program should recognize the overall energy efficiency of the pyrolytic Low-E. On that basis, DOE's proposed 3 zone criteria should not be adopted. The Department of Energy, Office of Energy Efficiency and Renewable Energy, should adopt the 4-zone alternative proposal. This map saves more overall energy, maintains competition in the marketplace, and allows for lower home heating costs for consumers. I believe this change can be implemented and in the end, the real winner will be the window industry, DOE and ultimately, the consumer.

Sincerely,

cc: Richard Karney
Energy Star Program Manager
via fax - 202-586-5954

Pilkington North America Inc.

Center and 20th Street, Ottawa, Illinois 61350

March 17 2003
Donna Heath
2739 E 1809 Rd
Ottawa Ill
61350