



September 5, 2018

Ann Bailey, Director ENERGY STAR® Product Labeling  
 U.S. Environmental Protection Agency  
 Washington, D.C. 20460  
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Dear Ms. Bailey:

Thank you for your invitation to provide written comment on the proposed ENERGY STAR Most Efficient Criteria for 2019. AAMA and its membership offer the following:

The ENERGY STAR Most Efficient Program has now been active for several years, and the proposed criteria for “best-of-the-best” products for 2019 were recently released. It has again been noted that only residential window products are covered by the Residential Windows, Doors and Skylights ENERGY STAR Certification program for Most Efficient which effectively excludes other key fenestration product categories. In previous program revisions, AAMA submitted letters requesting the inclusion of doors, skylights and tubular daylighting devices (TDDs) in this program. Thus far, those concerns have not resulted in the unrepresented product types being incorporated.

AAMA and its members once again request that you strongly consider the inclusion of doors, skylights and TDDs with windows in the program. We believe it is in the best interest of the consumer to provide a complete product offering allowing the best-of-the-best products to be selected and highlighted.

As a reminder, the EPA originally delayed door criteria inclusion in the Most Efficient program for simplicity. However, consumers and AAMA members need to have the companion door products in this program to complete a total house package. Our suggestion is to create a single category for doors with greater than half lite that matches the Most Efficient criteria for windows. For simplicity, at this time, we recommend not including opaque doors or those with equal to or less than half lite.

### Doors

Glazing Level	U-Factor <sup>1</sup>	SHGC <sup>2</sup>	
Opaque	≤ 0.17	No Rating	
≤ ½-Lite	≤ 0.25	≤ 0.25	
> ½-Lite	≤ 0.30	Northern North-Central	≤ 0.40
		Southern South-Central	≤ 0.25

### Existing Energy Star Criteria for Doors



Additionally, AAMA has the nation's largest group of skylight manufacturer members, and they – along with their distributors and suppliers – remain significantly interested in participating in this important product recognition program.

The Most Efficient program has been designed and marketed to highlight, for environmentally-minded consumers, the most efficient products available. As manufacturers, we are challenged with balancing good thermal performance with sufficient daylight levels. It is important to note that the harvesting of sufficient daylight can be hindered when fenestration systems are optimized for maximum thermal performance which may result in energy inefficiencies elsewhere in the building, such as through additional use of electric lighting.

When considering effectiveness and efficiency of fenestration products for their daylight potential and benefit, toplighting solutions often yield the best-balanced energy and daylighting solution by offering improved daylight uniformity (and availability) while employing significantly smaller aperture areas than would be required using only windows.

Therefore, it is our strong contention that this type of valuable recognition should also be extended to the best of the skylight and TDD products that have proudly and actively participated in the ENERGY STAR program for many years. In the past, EPA may not have found suitable tools to accurately measure the full and true energy savings impact when skylight products are used, including the reduction in electrical lighting loads by increased natural daylighting opportunities. We can assist in looking at the complete picture using current data with appropriate static assumptions and modeling methods.

Finally, the inclusion of windows and exclusion of doors, skylights and TDDs presents an unjustified product bias at the consumer level. Allowing Most Efficient recognition for one fenestration product category but not for others creates the impression that manufacturers of excluded categories do not have the capacity to create and market products meeting any aggressive ENERGY STAR Most Efficient criteria that this targeted consumer segment demands. That is not the case with doors, skylights and TDDs, all of which have highly efficient options currently available, and these premium products should be included in the Most Efficient program for consumers to highlight the clear distinction from standard products. This is especially critical in light of the accelerating uptake by the market of the Most Efficient program.

AAMA staff and our manufacturer members are ready to assist EPA in all aspects of making this program as fair and inclusive as it can be. We look forward to helping grow the program and providing continued support.

Sincerely,

Steven Saffell,  
AAMA Technical Director