

September 13, 2013

Mr. Doug Anderson
ENERGY STAR for Windows, Doors, and Skylights Program
U.S. Environmental Protection Agency
Washington, D.C. 20460

Subject: Comments regarding ENERGY STAR Final Draft Version 6.0 of the Windows, Doors, and Skylights Product Specification

Dear Mr. Anderson,

We offer the following comments on behalf of the American Council for an Energy Efficient Economy (ACEEE) on the *ENERGY STAR Final Draft Version 6.0 of the Windows, Doors, and Skylights Product Specification* from July 31, 2013. We appreciate the opportunity to comment on the draft specification, and value the work you have done to ensure careful analysis of proposed changes throughout the revision of this specification. We also appreciate the time you have taken to inform and educate stakeholders of the proposed changes to the specification in the *Final Draft Version 6.0*.

ACEEE is a nonprofit, non-partisan, organization dedicated to advancing energy efficiency as a means of promoting both economic prosperity and environmental protection. ACEEE fulfills its mission by conducting in-depth technical and policy assessments; advising policymakers and program managers; working collaboratively with businesses, public interest groups, and other organizations; publishing books, conference proceedings, and reports; organizing conferences and workshops; and educating consumers and businesses.

Support for timely revision of the specification. ACEEE strongly supports EPA's work to revise the specification at this time. The high market share that ENERGY STAR windows, doors, and skylights hold, as of 2011 (79%, 80%, and 70% respectively) is indicative of the progress in these product categories since the last product specification. This revision supports EPA's goal for the ENERGY STAR label to reflect roughly the top 25% of models in the marketplace. While the significant adoption of these ENERGY STAR products by consumers is indicative of a successful program, we advise against setting too low a threshold for product efficiency, because of the potential to degrade the ENERGY STAR label's significance to customers who expect the label to indicate a highly efficient product. The ENERGY STAR program has grown into a successful and well recognized program. For continued success of the program, ACEEE advocates for timely alterations to the specifications to ensure the label continues to denote the top quarter of the market. We believe that EPA has a commitment to the public to make sure the ENERGY STAR label remains a sign of high efficiency products in a continually developing market, so that the value of the label and program is not degraded to customers. It increases confusion with the ENERGY STAR label when an ENERGY STAR label on one product means a unit is one of the most efficient on the market, while for another product, the unit is only of average efficiency for what is currently on the market.

Support for manufacturer installation instruction requirement. ACEEE would like to commend the EPA on the decision to include requirements for manufacturer installation instructions in the new

specification. We support a whole home approach to energy efficiency, and believe it is important to recognize the severe limitations of even the most energy efficient windows if they are not installed correctly. We appreciate EPA bringing attention to the importance of quality installations for these products. ACEEE supports continued attention to the matter of proper installation and suggests revisiting the issue in the next specification revision to assess how the requirement to include manufacturer installation instructions is furthering the goal of quality window installation. We believe this is a step in the right direction, but that consumers may benefit further from incorporation of training and/or certification requirements for window installers into a future iteration of the specification.

ENERGY STAR specifications should be more stringent than code requirements. ACEEE would also like to recognize the importance of the ENERGY STAR specification keeping up with and exceeding the model International Energy Conservation Code (IECC) requirements for windows. A number of states are moving forward with adoption of the 2012 IECC, and some individual cities are also strengthening code requirements through the adoption of “stretch codes”. With the current ENERGY STAR specification in effect, there are some locations where the current ENERGY STAR specification is the same or less stringent than the 2012 IECC code. For comparison, the 2012 IECC requirements and the current ENERGY STAR window u-value specifications (from 2010) are detailed below:

ENERGY STAR climate zone	ENERGY STAR current (version 5.0) window u-value requirement	2012 IECC window u-value for corresponding ENERGY STAR climate zone*
Northern	0.30 or less OR =0.31 (if SHGC is 0.35 or greater) =0.32 (if SHGC is 0.40 or greater)	0.32 (zone 5, 6, 7, 8)
North-Central	0.32 or less	0.35 (zone 4)
South-Central	0.35 or less	0.40 (zone 2) to 0.35 (zone 3)
Southern	0.60 or less	0.65 (zone 1) to 0.40 (zone 2)

*Note that IECC and ENERGY STAR Climate Zones do not exactly align. There are more IECC zones than ENERGY STAR zones, thus, some zones have multiple u-values that apply.

While the energy code is meant to establish a baseline for efficiency in new buildings, the ENERGY STAR program has traditionally highlighted high efficiency products, and specifications should offer products that offer a considerable increase in efficiency as compared to baseline requirements. ACEEE believes that ENERGY STAR specifications should always be more stringent than current IECC requirements. Currently there are a number of cities in counties in the Southern ENERGY STAR Climate zone that have already adopted the 2012 IECC (including counties and local governments in Arizona and Texas located in the Southern ENERGY STAR climate zone).¹ Local and state governments continue to move forward with adoption of the 2012 IECC currently, thus we do not support pushing the effective date for version 6.0 to January 1, 2015. EPA’s research indicates that there are a number of products already available from a variety of manufacturers at a range of price points that meet the proposed specifications, and we feel that pushing the effective date to January 1, 2015 (1) furthers the confusion associated with ENERGY STAR specifications being lower than the energy code and (2) degrades the value of the label to customers who are looking for a higher efficiency product. Instead we suggest an effective date of July 1, 2014, to give

¹ <http://www.iccsafe.org/gr/Documents/2012Adoptions.pdf>

manufacturers sufficient time to prepare, while not delaying the effective date of important changes to the specification any longer than necessary.

Thank you for your consideration of these comments. ACEEE continues to support the ENERGY STAR program and we greatly appreciate the opportunity to offer the comments provided above. If there are any questions regarding our comments, please contact Rachel Cluett at rcluett@aceee.org.

Sincerely,



Jennifer Amann
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American Council for an Energy-Efficient Economy



Rachel Cluett
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