



February 6, 2013

To: windows@energystar.gov

Re: Draft 2 Version 6.0 ENERGY STAR®

We at Allied Building Products Corp. represent over 180 building material locations around the United States. As a leading roofing supply company, we like to advocate ENERGY STAR products to our customers. These products are reasonably priced and have a good payback to the end consumer. After reviewing your recent Version 6.0 proposal, I felt it was important to comment on your proposed skylight standards. In the version 6.0 of your proposed ENERGY STAR criteria, we were surprised to discover that the EPA's own analysis reveals our customers will pay over \$20-\$40 more than the cost of skylights that meet the current standards. Furthermore, the skylight changes will have over a 30 year payback period in our markets. Our customers have been willing to pay more for products with a reasonable payback period, but this seems to be an unreasonable proposition.

We believe this added cost will cause some homeowners to change from the already energy efficient product they buy today to a less energy efficient product at a lower cost, defeating the initial purposes of establishing the ENERGY STAR criteria.

In addition, this change will likely reduce or eliminate, in most of our locations, ENERGY STAR qualified products. As I have understood in the past, ENERGY STAR wanted to support energy efficient products that are readily available in the market. This new standard will likely change that position.

We at Allied Building Products Corp. encourage you to reconsider the value proposition on skylights. In discussing with our skylight suppliers, we believe you can improve the energy efficiency of skylight with incremental steps that offer a good payback. The current proposal, though, seems to be too large a step at this time.

Sincerely,

Tim Williams
Director of Marketing
Allied Building Products Corp.