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The Attachments Energy Rating Council's Response to the ENERGY STAR® Specification of Exterior and Interior Storm Windows Draft 2 Version 1.0

The Attachments Energy Rating Council (AERC) appreciates the opportunity to comment on the ENERGY STAR Specification for Exterior and Interior Storm Windows Draft 2 Version 1.0. AERC has been tasked by the U.S. Department of Energy to rate, certify, and label the energy performance of window attachments, including storm windows.

AERC strongly supports the development of an ENERGY STAR program for Exterior and Interior Storm Windows and endorses the direction of Draft 2. AERC serves as a truth-in-labeling program for window attachment products, but ENERGY STAR provides a clear and well-recognized brand that will allow consumers to easily identify the most energy efficient storm window options.

Using the ENERGY STAR Name and Marks

AERC strongly supports the inclusion of a climate map on the ENERGY STAR storm windows label. The label clearly identifies certification under the storm window category and the map will help consumers to select the product best suited for their climate. AERC also agrees with ENERGY STAR's decision to not require product performance information to be displayed on the product. AERC anticipates that many ENERGY STAR certified storm windows will also be certified through AERC and will carry the AERC label which contains Energy Performance information.

Definitions

AERC encourages ENERGY STAR to align its definitions with AERC's which have been vetted through a committee process in consultation with manufacturers. Specifically, AERC encourages EPA to revise its definitions and adopt the following definitions:

Air Leakage: A measure of the rate of air passing through a material or assembly in the presence of an applied pressure difference, expressed in units of cfm/ft² (L/s/m²).

Emissivity (ε): The relative ability of a surface to reflect or emit heat by radiation. Emissivity ranges from 0.00 to 1.00.

Solar transmittance (Tsol): The ratio of transmitted radiant flux in the solar spectrum (300nm to 2500nm) to incident radiant flux in the solar spectrum.



Excluded Products

AERC appreciates the clarification that storm doors are excluded from the current spec and encourages ENERGY STAR to evaluate including them the next time the specification undergoes a full revision. AERC supports and encourages EPA to examine adding additional window attachment categories in the near future. In addition to storm windows, AERC currently offers ratings for cellular shades, roller shades, solar screens, pleated shades, and blinds.

Certification Criteria: Energy Efficiency Requirements

AERC continues to encourage EPA to move forward with the certification criteria proposed in the V1.0 specification, but requests that EPA evaluates adopting AERC's Annual Energy Performance (AEP) metric for the next major specification revision. AERC believes that an AEP rating is the easiest way for consumers to understand and make comparisons between products.

Product Listing Guidance

Since ENERGY STAR intends to have a consumer-accessible Qualified Products List for storm windows, AERC also suggests that ENERGY STAR advise certification bodies about how product models (or defining characteristics) should be listed on the Qualified Product List. AERC believes providing this guidance will create greater consistency among CBs about how products are represented on the QPL and will help consumers to more easily identify ENERGY STAR certified storm window models that meet their needs through the online QPL. For the purposes of utility programs, having unique product models and model numbers clearly defined on the QPL will help to streamline rebate verification.

In conclusion, AERC strongly supports the development of an ENERGY STAR Storm Window program, appreciates the opportunity to comment on the ENERGY STAR Specification of Exterior and Interior Storm Windows Draft 2 V1.0 document, and looks forward to the release of the final draft.

Sincerely,

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