

May 8, 2018

Doug Anderson  
ENERGY STAR® Program  
US Environmental Protection Agency  
Washington, DC 20460

Dear Mr. Anderson:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to ENERGY STAR® Exterior and Interior Storm Windows Draft 2 Version 1.0, released by the Environmental Protection Agency (EPA) on April 4, 2018.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR® Program. CEE members are responsible for ratepayer funded efficiency programs in 46 US states, the District of Columbia, and seven Canadian provinces. In 2016, CEE members directed nearly \$7 billion of the \$8.8 billion in energy efficiency and demand response program expenditures in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR, so it may continue to serve as the national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the United States and Canada. We appreciate the opportunity to provide these comments.

## **Proposed Specification Offers an Effective Platform to Deliver Energy Savings**

CEE continues to see this new ENERGY STAR storm window product category as a promising option for identifying new promotional opportunities within the residential portfolio. We endorse the proposed use of the ENERGY STAR public website to both message about the distinctions between fenestration products and provide homeowners with tools to help determine the right application for their needs. This educational

approach will serve to mitigate any consumer confusion regarding how low-e storm windows compare to replacement windows and also help to inform customers of how certified low-e storm windows compare to clear glass panels.

Members across diverse climates and regulatory jurisdictions are interested in promoting window attachments for their energy savings potential as well as several non-energy amenities they provide customers. These products are applicable solutions for a diverse range of retrofit circumstances, building conditions, and homeowner needs. Two examples of ideal candidates for low-e storm windows include:

- Historic residences, which are often subject to retrofit parameters that limit the ability to alter physical characteristics of the building; these homes can be constrained as to the number of viable home improvement options, given the aesthetic restrictions of local building codes
- Low income households, where costs can significantly limit the number of retrofit options a homeowner can afford to undertake; attachment products are typically a much more affordable solution than full window replacements, and often deliver significant savings above the existing conditions

In addition to the thoughtful attention given to how this specification addresses each of ENERGY STAR's guiding principles, we note that the development process to date for this new product category exemplifies the *Standard Operating Procedure for Revising and Establishing an ENERGY STAR Product Specification* published in April 2018. The Framework Document, Draft 1, and Draft 2 of the ENERGY STAR Exterior and Interior Storm Windows specification have all kept with the spirit of the procedure through comprehensive analysis of energy savings, thorough feedback to stakeholder comments, and considerate explanations of the decisions put forth. We look forward to seeing this level of diligence and transparency applied to all products within the ENERGY STAR program.

A further example of member program activity and findings, beyond those that CEE shared with EPA in our comments to the Draft 1 specification, is the results from a pilot that Focus on Energy—Wisconsin recently completed. The final report found that “low-E storm windows are a viable and valuable new measure for Focus on Energy.”<sup>1</sup> They were able to claim a deemed savings of 0.54 annual kWh above a single pane baseline window and 0.48 annual kWh above a double pane baseline for single-family homes. As this work transitions from pilot to full-scale program deployment, it seeks to align with the ENERGY STAR specification as well as the AERC ratings. Establishing greater national consistency and definitions for what constitutes an efficient low-e storm window will help enable

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<sup>1</sup> Focus on Energy, Low-E Storm Window Market Expansion Pilot: Final Report, January 10, 2018, pg. 3, [https://focusonenergy.com/sites/default/files/2018-01/Low-E%20Storm%20Window%20Pilot%20Final%20Report\\_1-10-18.pdf](https://focusonenergy.com/sites/default/files/2018-01/Low-E%20Storm%20Window%20Pilot%20Final%20Report_1-10-18.pdf).

greater binational market transformation as CEE members like Focus on Energy work to deploy offerings in their local service territories. Given that much of the supply chain and distribution channels for these products operate through regional or national stakeholders, this federal label can help create consistency across individual local efforts.

## **Added Requirements for Certification and Verification Increase Credibility of Label**

Ratepayer funded programs are subject to regulatory scrutiny that typically requires that promoted measures be subject to third-party testing or other nationally accredited methods that ensure both quality and consistency of manufactured products.

The new language included in Draft 2 with respect to certification and testing further bolsters the ability of the ENERGY STAR label to serve as an eminent differentiator for quality distinction in the market. Adding criteria that require products be tested to national test procedures that have been vetted through an inclusive process and subsequently administered by third-party laboratories establishes increased confidence that there are verified performance outputs across all qualifying models.

## **Future Opportunities for the ENERGY STAR Program**

CEE is enthusiastic about an ENERGY STAR label for exterior and interior storm windows is under development. We believe this specification will serve as an important mechanism to help differentiate efficient options in the market for consumers. As energy efficiency portfolio managers continue to seek measures that will garner savings for their customers, especially as existing offerings trend towards a decrease of delta savings, the broader suite of fenestration options may serve as a particularly promising category for greater promotion. Furthermore, the independent public interest nonprofit Attachments Energy Rating Council (AERC) is actively working to develop procedures to certify various window attachments beyond low-e storm windows. Upon completion of Phase 1 (cellular shades, blinds, roller shades, storm windows, solar screens and pleated shades), and subsequently Phase 2 (awnings, roller shutters and window quilts) and Phase 3 (drapes, louvered shutters, applied window films, roman shades and sheer shades),<sup>2</sup> there will be ratings and certification for a broader suite of attachment products. These may serve as foundational elements for prospective ENERGY STAR labels or other EPA activity for

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<sup>2</sup> Attachments Energy Rating Council: <https://aercnet.org/certification/> Accessed April, 2018.

supporting differentiation of high performing options and bringing attention to energy savings opportunities for residential customers. We look forward to working together to assess these opportunities and their suitability for the ENERGY STAR program in an effort to identify ways to capture savings across all cost-effective fenestration applications.

CEE would once again like to thank the EPA for the opportunity to comment on ENERGY STAR® Exterior and Interior Storm Windows Draft 2 Version 1.0. Please contact CEE Senior Program Manager Alice Rosenberg at 617-337-9287 with any questions about these comments.

Sincerely,



Ed Wisniewski  
Executive Director