

July 30, 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 Final Draft Version 1.0, released by the Environmental Protection Agency (EPA) on July 16, 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 40 US states, the District of Columbia, and four 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.

## **CEE Supports Proposed Exterior and Interior Storm Windows Specification**

CEE remains highly in favor of an ENERGY STAR category for storm windows within the suite of labeled products. As EPA has already identified through in-depth research and demonstration during the specification development thus far, exterior and interior storm windows are a promising opportunity for achieving energy savings in residential applications. The educational features included in the proposal will further help reduce

consumer confusion regarding how these attachment products compare to replacement windows.

As articulated further in previous CEE comments on previous iterations of the ENERGY STAR recognition criteria ([October 17, 2017 letter](#) in response to Draft 1 and [May 8, 2018 letter](#) in response to Draft 2), fenestration is a critical variable of a home's energy consumption, and CEE therefore considers it important to support all cost-effective options that provide efficiency gains without compromising customer satisfaction. Exterior and interior storm windows are one such application, and we are pleased to see EPA identify this category within the ENERGY STAR portfolio. Given the complexity and diversity of the broader fenestration market, development of federal binary labeling for this area will help denote to end users that storm windows can deliver credible energy savings and that there are distinctions among the performances of different products available in the market.

## Thorough EPA Analysis Provides Credible Basis for Claiming Energy Savings

The detailed and comprehensive analysis that EPA conducted for the Framework Document, Draft 1, Draft 2, and this Final Draft provides a strong foundation for many efficiency programs to consider promotion of qualified storm window products in their portfolios. As ratepayer funded programs are subject to regulatory scrutiny, this level of diligence is greatly appreciated by those seeking to adopt storm window products in program offerings. With this most recent draft proposal, both the orientation analysis and payback period analysis supply an even greater basis for individual programs to potentially have confidence in quantified savings.

## Consistent Definitions Minimize Market Discrepancies

Since EPA refers to the Attachments Energy Rating Council (AERC) test method requirement, the decision to align revised ENERGY STAR definitions for air leakage, emissivity, and solar transmittance align with AERC wording enables more effective coordination. As AERC is the third-party organization that develops procedures to certify and rate attachment products, it is beneficial for EPA to align the relevant metrics used to measure storm window energy performance.

## Potential Future Roles for ENERGY STAR in the Broader Attachments Category

As noted in previous comment letters during the development of this storm windows specification, CEE believes that other opportunities within the larger suite of fenestration options may merit consideration for promotion through the ENERGY STAR platform. With AERC actively working to develop procedures for certifying window attachments beyond low-e storm windows, there may be opportunities to explore an ENERGY STAR role in differentiating these measures through a label or other strategies designed to deliver credible savings. The scope of products anticipated to receive ratings and certifications through this AERC work includes cellular shades, blinds, roller shades, storm windows, solar screens, pleated shades (Phase 1), awnings, roller shutters, window quilts (Phase 2), drapes, louvered shutters, applied window films, roman shades, and sheer shades (Phase 3).<sup>1</sup> In addition to these discrete labeling and testing efforts, there are potential opportunities for attachment products to deliver interactive or dynamic savings through the Integrated Home. As with other residential products that incorporate communicating or controllable features, these capabilities may have the potential to deliver increased efficiency, load management benefits, or enhanced customer experience. We look forward to working together to assess future opportunities for the ENERGY STAR program to capture savings across all cost-effective fenestration and whole house applications, serving as a useful resource to help consumers make decisions.

CEE would once again like to thank EPA for the opportunity to comment on ENERGY STAR® Exterior and Interior Storm Windows Final Draft 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

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<sup>1</sup> Attachments Energy Rating Council, "Certification Program," accessed April 2018, <https://aercnet.org/certification/>.