



May 4, 2018

Doug Anderson
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Doug:

Larson Manufacturing Company appreciates the ongoing efforts of the Environmental Protection Agency in the development of an Energy Star program for storm windows. Thank you for the opportunity to respond to the Energy Star Program Requirements for Exterior and Interior Storm Windows Draft 2 Version 1.0 and accompanying support materials.

Since the Specification Framework Document was initially released in January of 2016, the EPA has demonstrated a willingness to keep the process transparent and has encouraged and addressed input from stakeholders both supporting and questioning the need for an Energy Star program for storm windows. The thorough research and analysis that has been conducted will ensure the proposed program is sound, will support the Energy Star guiding principles, and will assist consumers in identifying and selecting energy efficient products that save energy and are good for the environment. An Energy Star program for storm windows will provide affordable, reasonably priced Energy Star window options to consumers that may be unable to afford other alternatives.

Specific to the Draft 2 specification, Larson believes the change to the proposed labels will help alleviate any potential confusion between a storm window program and the existing program for windows, doors, and skylights. Larson also appreciates the consideration and additional analysis given to interior storm windows, particularly in the Southern and South-Central zones, which will provide consumers in these regions more energy-saving product options than previously available in Draft 1. In addition, while product safety and quality are of utmost importance to Larson, Larson supports the decision to not layer on eligibility requirements unrelated to energy performance that would increase product costs unnecessarily. Finally, Larson appreciates EPA's willingness to consider alternative performance metrics such as AERC EP ratings, since multiple eligibility paths would offer manufacturers the flexibility to choose the one that aligns best with their business.

Larson offers two editorial suggestions for the Draft 2 requirements and Consumer Checklist:

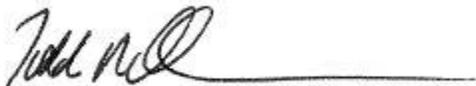
- In Section 3A (Energy Efficiency Requirements) of the program requirements, it may be helpful to specify that product *glazings* shall have emissivity and solar transmittance ratings that meet or exceed the criteria described in Table 1, since confirmation of *glass* properties is later described in Section 5.
- In the consumer checklist, in response to the question "Are your current windows difficult to clean?" Larson suggests changing the second sentence to "Consider storm windows with features designed to make cleaning easy." since even non-operable storm windows can be easy to clean if designed with this in mind.

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Larson Manufacturing Company continues to support the EPA's efforts to develop an Energy Star program for storm windows. Such a program will assist consumers in selecting the most efficient products by creating an independent, credible, and highly recognizable program for this product category. Please do not hesitate to contact me should you have any questions or wish for clarification on anything. Thank you.

Regards,

A handwritten signature in black ink, appearing to read "Todd Stratmoen", followed by a horizontal line extending to the right.

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