



September 17, 2013

Mr. Doug Anderson  
ENERGY STAR Programs  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

**Re: ENERGY STAR Version 6.0 Final Draft Report**

Dear Mr. Anderson,

Thank you for the opportunity to comment on the specification for Windows, Doors and Skylights. As a longstanding partner who has earned eleven consecutive ENERGY STAR awards, four consecutive WaterSense awards and four consecutive SmartWay awards, we value our relationship with ENERGY STAR and the importance of the brand to our customers as they look for proof points in their decision making process.

We also take seriously our responsibility as a leading home improvement and look to offer energy efficient products to our customers with the appropriate value proposition (affordability and efficacy). It is with that lens that we offer these comments on the Final Draft of Version 6.0.

As we stated in our February 8, 2013 comments, "One of the hallmarks of the ENERGY STAR value proposition has been the utility savings attached to ENERGY STAR that can be used as a compelling selling point (payback period) to encourage upgrading existing product. The projected increase connected to the new standard is between \$25-40 with a payback of between 7 to 171 years, depending on zone. Customers are generally impatient when it comes to payback, and seven years can exceed their tolerance, and that's recognizing that most of the payback periods were in the 20+ range."

We are also aware of additional research conducted by EPA on skylight availability and cost published on September 3rd of this year where EPA concluded the research "demonstrates that a majority of fixed skylight products being marketed on a national basis already meet or exceed the proposed Final Draft Northern Zone criteria." A link to the research summary follows:

[http://www.energystar.gov/ia/partners/prod\\_development/revisions/downloads/windows\\_doors/IE\\_Test\\_Conditions.pdf?9a0b-fbcf](http://www.energystar.gov/ia/partners/prod_development/revisions/downloads/windows_doors/IE_Test_Conditions.pdf?9a0b-fbcf)

Our research has shown Customers' are willing to select environmentally responsible products but only when the performance meets or exceeds the conventional product and with a reasonable price premium. The resulting increase in price connected to tightened standards may limit consumer' willingness to upgrade to more energy efficient alternatives. It may also decrease the number of ENERGY STAR products offered in our stores. In either case, the ENERGY STAR brand will erode. As a retailer, we understand the value of a trusted brand.

Recognizing that retailers and EPA are divided on the relationship between product value proposition and consumer acceptance, we encourage you to delay the draft version specification so that a more informed and in-depth discussion can take place. Lowe's is certain there are more effective ways of incrementally increasing product efficiency without pricing our customers out of this important market and would like to work with your agency along with other retailers to chart a path to success.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Chenard', written in a cursive style.

Michael Chenard  
Director, corporate sustainability