

February 8, 2013

To: windows@energystar.gov

Draft 2 of the ENERGY STAR for Windows, Doors, and Skylights Version 6.0 Specification

Thank you for the opportunity to comment on the draft specification for Windows, Doors and Skylights. As a longstanding partner and multi-year award recipient, we value our relationship with ENERGY STAR and the value your brand brings 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 became concerned with the proposed version 6.0 standards for skylights.

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.

Our research has shown Customers' are willing to select the environmentally responsible product but only when the performance meets or exceeds the conventional product and with a minimal price premium. Raising the standards with the resulting increase in price will limit the number of customers who upgrade from plastic to energy efficient glass skylights. It may also decrease the number of ENERGY STAR skylights offered in our stores. In either case, the ENERGY STAR brand will erode. As a retailer, we understand the value of a trusted brand.

We encourage you to reconsider the draft version specification, specifically for skylights. Lowe's is certain there are more effective ways of incrementally increasing the efficiency of skylights without pricing our customers out of this important market.

Thank you for your consideration.

Your ENERGY STAR Partner,

Michael Chenard
Director, corporate sustainability
Lowe's