September 28, 2012

To: Environmental Protection Agency

Re: Comments on ENERGY STAR® Program Requirements Product Specification for Windows, Doors and Skylights, Draft 1 Version 6.0
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This letter is in regard to the request for comments on the ENERGY STAR Program Requirements Product Specification for Windows, Doors and Skylights, Draft 1 Version 6.0. Milgard appreciates and fully supports the goal of the EPA to raise the bar for ENERGY STAR to preserve the brand and to encourage energy efficiency through technology and innovation. We would like to provide you with feedback on the Draft 1 of Version 6.0 that was sent to us and to outline what we believe would be the best for the EPA as well as the window, door and skylight industry.

2.3 Program Elements Remaining Unchanged:

2.3.1 ENERGY STAR Climate Zones: There was extensive discussion during the Version 5.0 revision process but it was not clear to us why the Pacific Northwest region (specifically Seattle and Portland areas) would be classified as the same region as North Dakota and Minnesota. While the latitude of these areas may be the same, the climate is very different and do not require the same energy efficiency as other areas in the Northern Climate Zone. An original proposal by the DOE suggested that the western parts of Washington and Oregon be different from the Northern Climate Zone but was later scrapped without much explanation. The building codes in the PNW region may have supported the changes to Version 5.0 but the Version 6.0 revisions would require a U-factor far below building codes and is not necessary for the climate for energy savings.

2.4 New Additions to Program Requirements:

2.4.1 Air Leakage: Milgard supports the requirement of air leakage for ENERGY STAR qualification. In addition, we support using the NAFS (AAMA) method and test results for this program. Currently, most Milgard products are NAFS (AAMA) tested but not all are certified as mentioned in Section 2.4.1. The reason for our fiberglass products not being certified is not due to the window performance, but rather the fiberglass material certification process. The AAMA 112-11 document which covers certification for fiberglass pultrusions is new and we are working on getting our fiberglass profiles to meet the criteria. These windows are still independently tested and have Air Leakage numbers as tested to the ASTM E283 test standard but they do not have a recognized "certification" from AAMA. Milgard is recommending that the Air Leakage requirements be specified as "independently tested per NAFS-08 (ASTM E283)" but not for specific association certification. Milgard also believes that air leakage values are only valid with the prerequisite of operating force to assure that manufacturers do not sacrifice operation in favor of reducing air leakage.

2.4.2 Installation Instructions: Milgard understands the importance of proper installation of windows, skylights and doors, we recognize that installation methods can vary greatly by type of building construction and product manufacturer. The resources, costs and complexities to comply with current Draft 1 language will result in a heavy burden for manufacturers as well as confusion with window and door installers and consumers. Therefore, we request that the ENERGY STAR language be changed and limited to only the following statement*: "To qualify for ENERGY STAR, products shall have instructions for TYPICAL window, door and skylight installations readily available."*

3.0 Version 6.0 Draft 1 Criteria for Windows:

Milgard supports the U-factor and SHGC criteria listed in Table 2. However, Milgard does not agree with the financial analysis reported by the EPA due to the small number of manufacturers that participated in reporting costs. The cost for many manufacturers for reaching the Energy Star 6.0 criteria will be higher than what is predicted resulting in a longer payback for consumers based on our own internal analysis as well as discussions within AAMA. We believe that this is deceiving to the consumer and could result in damage to the Energy Star brand.

4.0 Version 6.0 Draft 1 Criteria for Doors:

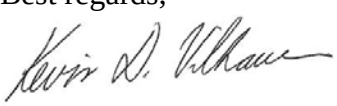
The U-factor requirements range for doors seem appropriate. However, we are concerned about the SHGC requirement being the same for all zones (especially the >1/2 lite). We have two issues with the SHGC. First, in the Northern Climate Zone a higher SHGC in many cases results in a more energy efficient house due to passive heating. Second, with such a low SHGC, there may be cases where a low SHGC Low-e is required for the door to achieve the Energy Star 6.0 criteria where the windows would only need a moderate SHGC Low-e product resulting in non-matching glazing color. In order to match the glazing, the windows would need to use the low SHGC Low-e resulting in even less energy efficiency in the Northern Climate Zone and cost the consumer more due to the higher cost of the glass.

5.0 Version 6.0 Draft 1 Criteria for Skylights:

Milgard agrees with the U-factor requirements for the skylights. The argument against the SHGC being the same for all zones does not hold true for skylights. Doors and windows are often on the same side of a house and the glass would need to match. However, the skylights are not usually near windows and are at an angle to the windows so it is less obvious if the glass does not match.

Please let us know if you have any additional questions or would like clarity in any of our responses. Thank you for the opportunity to weigh-in on the Version 6.0 Draft 1 and we look forward to participating in future communication opportunities.

Best regards,



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