



September 13, 2013

To: Environmental Protection Agency

Re: Comments on ENERGY STAR® Program Requirements Product Specification for Windows, Doors and Skylights, Final Draft Version 6.0

Pages: 2

This letter is in regard to the request for comments on the ENERGY STAR Program Requirements Product Specification for Windows, Doors and Skylights, Final Draft 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 also wanted to thank you for listening to the many voices that have opinions on what the criteria should be and continuing the open dialogue with our industry. You have welcomed some suggested changes while providing reasons for not accepting others.

Milgard would also like to provide you with feedback on the Final Draft of Version 6.0 that was recently published and to outline what we believe would be the best for the EPA as well as the window, door and skylight industry.

Energy Efficiency Requirements

Window Criteria:

We at Milgard appreciate the ambition of the EPA to achieve energy savings through the lowering of the U-factor and SHGC criteria across the United States. However, through several discussions with several members in the fenestration industry we have decided that the following chart aligns with other’s recommendations for the ENERGY STAR Version 6.0 criteria:

DRAFT CRITERIA FOR WINDOWS				
	ENERGY STAR Final Draft U-Factor	ENERGY STAR Final Draft SHGC	Milgard Recommendation U-Factor	Milgard Recommendation SHGC
Northern	≤ 0.27	Any	≤ 0.29	Any
	= 0.28	≥ 0.32		
	= 0.29	≥ 0.37		
	=0.30	≥ 0.42	= 0.30	≥ 0.42
North-Central	≤ 0.30	≤ 0.40	0.30	≤ 0.40
South-Central	≤ 0.30	≤ 0.25	0.32	≤ 0.25
Southern	≤ 0.40	≤ 0.25	0.40	≤ 0.25

The reasoning behind our decision to raise the thermal requirements for the ENERGY STAR Version 6.0 criteria is because our internal analysis shows that the cost for many manufacturers to reach the Final Draft proposed criteria will be higher than what is predicted by the EPA resulting in a longer payback for consumers. This was supported

by discussions within AAMA and has substantiated a similar response from AAMA as well. We believe that this is deceiving to the consumer and could result in damage to the ENERGY STAR brand.

Door Criteria:

We agree with the EPA’s previous decision to adjust the U-Factor maximum to 0.25 for $\leq \frac{1}{2}$ -lite and this will now allow full-lite and $\frac{1}{2}$ lite doors to use the same glass package. However, to ensure that the window trade-off options included within the Final Draft do not impede the ability to match the glazing color options of $> \frac{1}{2}$ -lite doors, we suggest the EPA establish a similar trade-off option for $> \frac{1}{2}$ -lite doors in the Northern Zone, using a U-Factor of 0.32 if the SHGC is ≥ 0.40 . This change should significantly reduce the strong possibility of glazing color mismatch of residential fenestration.

DRAFT CRITERIA FOR DOORS					
Glazing Level	ENERGY STAR Final Draft U-Factor	ENERGY STAR Final Draft SHGC		Milgard Recommendation U-Factor	Milgard Recommendation SHGC
Opaque	≤ 0.17	No Rating		≤ 0.19	No Rating
$\leq \frac{1}{2}$ -lite	≤ 0.25	≤ 0.25		≤ 0.25	0.25
		Climate Zone			
$> \frac{1}{2}$ -lite	≤ 0.30	Northern North-Central	≤ 0.40	≤ 0.30 trade-off = to 0.32 if SHGC is ≥ 0.40	≤ 0.30 trade-off equivalent option is ≥ 0.40
		South-Central Southern	≤ 0.25		

Recycled Material Requirements

Due to the varying fenestration materials and product types recognized by the ENERGY STAR program, Milgard suggests that consumers be directed to the [EPA’s Building Materials Reuse Center](#) website. This website directs consumers to area Recycling Centers and offers additional important evidence on the benefits of recycling and conservation.

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

Best regards,



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