



NRDC Comments on EPA's ENERGY STAR Final Draft Version 6.0 Specification for Windows, Doors, and Skylights

September 13, 2013

On behalf of the Natural Resources Defense Council (NRDC) and its more than 1.3 million members and online activists, we respectfully submit the following comments on the EPA ENERGY STAR's Final Draft Version 6.0 Specification for Windows, Doors, and Skylights.

By limiting the number of products that qualify through regular updates of the criteria, the ENERGY STAR program ensures that its label remains a mark of distinction, designating only those products that meet high levels of energy efficiency as compared to standard products on the market. As such, NRDC is pleased to see EPA updating the specification in response to the extremely high market shares of windows, doors, and skylights that meet the Energy Star criteria of 81 percent, 71 percent, and 99 percent of their markets, respectively, as reported in EPA's Version 6.0 Specification Framework Document. The updates will help to ensure that the specification is meaningful in the marketplace in distinguishing more efficient products that provide cost-effective energy savings to consumers.

While NRDC supports EPA's efforts to update the criteria for windows and urges EPA to implement the updated criteria as soon as possible, NRDC argues that more stringent criteria would have likely been cost-effective and warranted. In particular, we are disappointed to see EPA weaken the U-value criteria in the north-central zone. NRDC also encourages EPA to consider an earlier implementation date than what is proposed in the final draft specification. EPA should continue to track the market transformation in future years and update the specifications accordingly. We offer the following comments on the proposed Version 6.0 criteria.

Comments on Proposed Specifications

NRDC supports the EPA's effort to update criteria for windows, doors, and skylights:

- **Windows.** NRDC supports the tightening of the criteria for windows, given the fact that ENERGY STAR windows have reached an 81 percent market penetration and that windows meeting more stringent criteria are cost-effective. Market data collected by the Alliance to Save Energy (ASE) and American Council for an Energy Efficient Economy (ACEEE) in 2010 and 2011 suggests that this market share is even higher in the replacement market; their research found that on average 90 percent of replacement windows sold

qualified for ENERGY STAR.¹ Given the fact that the market share for ENERGY STAR windows has exceeded 50 percent every year since 2005 (even after a specification update in 2009), the specification desperately needs to be updated. Furthermore, these high market shares (even immediately after a specification update) indicate that the windows market responds to ENERGY STAR rapidly. This quick market uptake will likely mean costs to meet the proposed specification will be lower than estimated and that even stronger criteria would likely be cost-effective.

EPA has proposed to loosen the U-Factor maximum in the North-Central zone to 0.3 from its earlier proposal of 0.29 because stakeholders indicated that a greater number of products were already being sold at that specification level. NRDC prefers the original proposal of 0.29 and postulates that even more stringent criteria would be cost-effective, precisely because the market share at 0.30 is already large. NRDC does support the simplification of the specifications by strengthening the South-Central U-Factor maximum to the same 0.30.

- **Doors.** NRDC supports the revised specification for doors, since ENERGY STAR doors now represent 71 percent of sliding doors in the marketplace.
- **Skylights.** NRDC supports the proposed criteria for glass skylights, which have reached an astonishing market share of 99 percent.

NRDC supports EPA's decision to consider air leakage and require available online installation instructions. Both of these measures will reduce energy losses due to imperfect installation or an unsatisfactory window seal. NRDC supports EPA's designation of an air leakage rating of ≤ 0.3 cfm/ft² in windows and ≤ 0.5 cfm/ft² in swinging doors.

NRDC encourages EPA to revise the Version 6.0 implementation date given the extremely high market share of ENERGY STAR windows and the long specification development period. Given that the Framework Document for these specifications was released in October 2011, which indicated that the specification would take effect in the fall of 2013, industry has had time to make preliminary plans for the production and marketing of the more efficient products. The high market share of ENERGY STAR windows, doors, and skylights, as well as the existing availability of more efficient products, belie the need for an effective date of January 2015. We urge EPA to maintain the effective date proposed in the Draft 2 version of the specification of January 2014. Furthermore, NRDC encourages EPA to watch the market share for ENERGY STAR windows closely as the new specification takes effect and to consider a higher target for windows in the near future.

¹ <http://aceee.org/files/pdf/fact-sheet/Energy%20Star%20Windows%20Survey%20Results.pdf>

Thank you for the opportunity to submit these comments.

Sincerely,



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