



PPG Industries, Inc.

Glass Business and Development Center, 400 Guys Run Road, Cheswick, Pennsylvania 15024 USA
Telephone: (412) 820-4926 Fax: (412) 826-2299 E-mail: pwbush@ppg.com

Paul W. Bush
Manager, Technical Services
PPG Flat Glass Products

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United States Environmental Protection Agency
ENERGY STAR for Windows, Doors and Skylights Program
1200 Pennsylvania Ave NW
Washington, DC 20460

Subject: Additional Stakeholder Comments from PPG Industries on the Proposed Criteria for ENERGY STAR® for Windows, Version 6.0.

Dear EPA Agency,

PPG Industries wishes to thank you for the opportunity to provide additional comments subsequent to our November, 2011 comments on the proposed improvements to the ENERGY STAR for Windows, Doors, and Skylights Program. First, let me express that PPG supports that the proposed recognition criteria for the new and distinct ENERGY STAR® Most Efficient Residential Windows Program incorporates a Northern climate zone U-factor of ≤ 0.20 . While others may wish to debate the semantics and impact on taxpayers of two programs vs. one program, PPG is disappointed that we are missing this opportunity to better align the EPA Energy Star climate zones with the major U.S. code, IECC, IRC & ASHRAE climate zones; That being said we do want to provide additional comments on the U-factor requirements for the EPA Energy Star for Windows Northern climate zone and request that the U-factor criteria for this climate zone be ≤ 0.25 . The comments below are offered to support this improvement to the criteria.

In place for several years now, the current Energy Star for Windows U-factor requirement for the Northern climate zone is ≤ 0.30 . The Energy Star for Windows Version 6.0 Specification Framework document offered that the proposed U-factor would be in the range of ≤ 0.25 to 0.27 for the Northern climate zone. The proposed Energy Star for Windows Version 6.0 draft 1 criterion has gone to the lower performing end of the range proposing a U-factor requirement of ≤ 0.27 for the Northern climate zone. PPG supports an Energy Star for Windows Northern climate zone U-factor requirement of ≤ 0.25 because it is achievable and will save consumers and the country significant energy. In addition:

- Ducker Research completed in August, 2012 shows that the overall ENERGY STAR market share for Windows in 2011 was 79%, well beyond the guiding principals of the Energy Star Program.

- The Ducker Research also shows that the ENERGY STAR market share is the highest in the Northern climate zone with nearly 1 out of every 2 windows sold being an Energy Star Window. This is nearly double the next highest Energy Star penetration level in any other climate zone. Tightening the U-factor requirement in the Northern climate zone will single handedly bring the entire program closer to the guiding principal on market share.
- Quote from the EPA Energy Star Specification Framework document: “EPA’s research has demonstrated that, based on currently available product, a significant reduction in U-Value is feasible”; Why then are we choosing a lower performing level?
- There are already over 80,000 double-hung products in the NFRC Certified Product Directory with U-factor’s less than or equal to 0.25. This is considerable when noting that current programs and codes do not require products to be better than 0.30 U-factor.
- A U-factor of 0.25 or below can be, AND IS being achieved with several non-proprietary technologies.
- Quote from the EPA Energy Star Specification Framework document: “EPA is looking to establish criteria that recognize the highest-performing doubles and bring a greater number of triple pane windows into the mainstream”. A U-factor requirement of ≤ 0.25 aligns better with this statement than the ≤ 0.27 level.
- The LBNL cost effectiveness study of the U-factor requirement for the Northern climate zone for the Energy Star for Windows Program shows that a lower U-factor will reduce overall energy consumption. With no intent to offend, frankly the ≤ 0.27 requirement appears sheepish and out of line with current technology and the EPA’s own, usually bullish approach in other areas concerning the environment. Improvements in the U-factor of windows for the Northern most portions of the country are a positive action for all of the ENERGY STAR guiding principles including reduced energy consumption, reduced consumer energy bills and helping to protect the environment.
- We hope that the proposed lower performing level of Energy Star is not setting the stage for the EPA to capitulate to a lower performing level on the Most Efficient Residential Windows Program.

In support of the continued improvement of a program which enhances energy efficiency, is good for the environment, offers consumers savings and improved comfort while enhancing product performance, we request that the U-factor criteria for the ENERGY STAR Northern climate zone be ≤ 0.25 .

We trust that these comments will be helpful and thank you in advance for due consideration of our input in the development of the final Energy Star Version 6.0 Criterion. As always we look forward to continued involvement in these efforts.

Sincere regards,



Paul W. Bush
 Manager, Technical Services
 PPG Flat Glass Products