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August 29, 2013

Mr. Douglas W. Anderson
United States Environmental Protection Agency
ENERGY STAR for Windows, Doors and Skylights Program Manager
Office of Air and Radiation
1200 Pennsylvania Ave NW
Washington, DC 20460
Submitted via: windows@energystar.gov

Subject: PPG Industries Comments on the Proposed Final Draft Criteria for ENERGY STAR® for Windows, Version 6.0 initially introduced in 2011.

Dear Doug,

Once again, PPG Industries wishes to thank you for the opportunity to provide additional comments subsequent to our November, 2011 comments and our September, 2012 comments on the proposed improvements to the ENERGY STAR® for Windows, Doors, and Skylights Program. PPG recognizes and appreciates the EPA's efforts to shape the requirements for this important ENERGY STAR product category and is pleased to share the comments below which are intended to facilitate modifications to these requirements.

In an effort to promote energy efficient products and in alignment with the Energy Star Programs own goals, PPG continues to pursue a more efficient U-factor requirement for Windows in the Northern climate zone. A real opportunity exists with a significant decrease in the high winter heating loads in the North as this would drive tremendous energy savings for the country and provide substantial cost savings for consumers. The current proposed 10% improvement is not a significant enough change given the current requirement will have been in place for over six years when the new requirement is to take effect. The comments offered below are in support of a 17% improvement over the current criteria where we request that the U-factor criteria for the Northern climate zone be $\leq$ 0.25.

- A significant improvement in U-factor is feasible. There are already a substantial number of window products available with U-factor's less than or equal to 0.25.
- A U-factor of 0.25 or below can be, AND IS being achieved with several non-proprietary technologies.
- The 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 and is cost effective for consumers.

- A U-factor requirement for windows in the Northern climate zone of ≤ 0.30 has been in the marketplace since 2009 via the 30 / 30 tax credit and the current Energy Star for Windows version 5 criteria. Implementation of a 10% reduction in 2015, six years later, is too small of an improvement and too slow. A U-factor requirement of <0.25 will result in getting better performing windows into the market to benefit U.S. consumers.
- The Energy Star for Windows Version 6.0 Specification Framework document originally proposed the U-factor would be in the range of ≤ 0.25 to 0.27 for the Northern climate zone. An Energy Star for Windows Northern climate zone U-factor requirement of ≤ 0.25 is achievable and will save consumers money and the country significant energy over and above a lower-performing 0.27 requirement.
- The overall ENERGY STAR market share for Windows will be in better agreement with the guiding principals of the Energy Star Program with a Windows Northern climate zone U-factor requirement of ≤ 0.25.
- A U-factor requirement of ≤ 0.25 recognizes the highest-performing double paned products and will bring a greater number of triple pane windows into the mainstream.

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

Regarding the implementation timing, ENERGY STAR criteria for windows, doors, and skylights were last updated in April, 2009. Four and one half years later in the fall of 2013, we are still debating the next update of the criteria and the implementation is being proposed for 2015. While the process is taking substantially longer than anyone originally anticipated, the EPA does reserve and maintain the right to alter this timeline at any time. An energy efficiency improvement is long overdue. We simply request that the EPA finalize the criteria and exercise its right to set the implementation date 270 days later.

The Energy Star for Windows, Doors & Skylights, V6 specification is an opportunity to improve energy efficiency for the United States. As such, we should take steps to move implementation along as quickly as possible. In comparison to delaying another 270 days or even longer until 2015, strong consideration should be given to establishing additional marketing incentives for those product manufactures that want to say they meet the V6 specification of ENERGY STAR today. The EPA should implement ideas such as but not limited to:

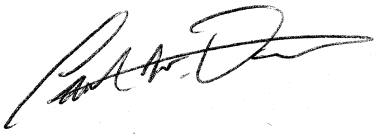
1. EPA Web-site promotion of products that meet the next version today;
    a. Permit manufacturers to link / promote
    b. Permit component suppliers to link / promote
2. Special Energy Star Labeling for products that meet Version 6.0 today;
3. Point of Sale materials for home centers and sales personnel for products that meet V6 today:
    a. Tri-fold or other literature on Energy Star comparing today vs. tomorrow
    b. “2015 Energy Star Compliant” signage, display pieces, etc.
4. Additional incentives to support manufacturer marketing programs for those that meet V6 or the Most Efficient Program requirements today.

This route also affords the EPA to utilize a good, better, best energy efficiency approach where products that meet the current V5 specification could be listed on the web-site as in the "Good" category; products that meet the V6 specification could be listed in the "Better" category and products that meet the most efficient program requirements could be listed in the "Best" category.

Lastly, regardless of people's position on the requirements of the 2009 ARRA "30 / 30" fiscal program for windows, most would say that overall the program was good for sales of windows. Given this the EPA should be supporting a similar program based on the performance requirements of the version 6 specification and / or the Most Efficient program.

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,



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