

February 11, 2016

US Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20004

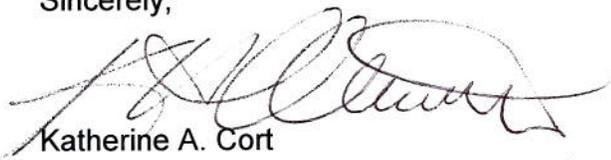
Re: Creation of ENERGY STAR Label for Exterior and Interior Storm Panels

Greetings:

In work sponsored by the U.S. Department of Energy (DOE) and the Northwest Energy Efficiency Alliance, Pacific Northwest National Laboratory (PNNL) performed a series of testing, verification, and market deployment activities related to fenestration attachments – in particular, low-e storm panels. Recent DOE-sponsored case studies, climate-based building simulation modeling, and findings from PNNL's Lab Homes experiments show that installing either interior or exterior low-e storm panels can result in significant heating and cooling savings, even when installed over double-pane windows. In addition, as part of a recent market assessment of low-e storm windows performed for DOE's Building America Program, the lack of a window attachment rating system or ENERGY STAR label was identified as a key barrier to market uptake of this technology.

For these reasons, we support the development and completion of an ENERGY STAR rating for storm panels and believe that this is a very important program that will provide beneficial information to building owners, operators, and consumers.

Sincerely,



Katherine A. Cort
Building America Window Attachment Program Lead
Pacific Northwest National Laboratory

cc: Michael Baechler, PNNL, Building America Program Manager
Dennis Stiles, PNNL, Building Efficiency Program Manager