



September 28, 2012

Mr. Doug Anderson
US Environmental Protection Agency (6202J)
ENERGY STAR® Home Improvement Program Manager
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Ms. Emily Zachery
D&R International, Ltd.
1300 Spring Street, Suite 500
Silver Spring, Maryland 20910

Dear Mr. Anderson and Ms. Zachery:

Pella Corporation appreciates the opportunity to review EPA's Draft 1 criteria proposal for Version 6.0 of the ENERGY STAR® Windows Program. We respectfully submit the following comments for your consideration:

- 1) **Increase the U-factor criteria for windows in the North-Central Zone from 0.29 to 0.30.** The proposed criteria of 0.29 will require significant product redesigns with minimal benefit to consumers. Setting the criteria to 0.30 will allow manufacturers to continue providing existing, affordable product to the market.

According to EPA's Criteria Analysis Report, the estimated incremental cost to meet the proposed North-Central Zone criteria vs. Version 5.0 criteria is \$28 per window. According to window sales volume used in LBNL's analysis, there were 9.88 million windows sold in the East North Central (ENC) and West North Central (WNC) regions in 2010. Conservatively assuming that half of those windows are sold into the North-Central Zone replacement market, and 81% of those are ENERGY STAR qualified, the incremental investment at \$28 per window is \$112,039,200.

According to an analysis conducted by LBNL, reducing the criteria from 0.30 to 0.29 increases the estimated energy savings in the North-Central zone by 0.16 trillion BTU (0.31 vs. 0.47 tBTU). Comparing this to the aggregate national estimate of 2.21 tBTU, the increase is approximately 7.2%. Applying this percentage to the \$39.98 million estimated cost savings yields only \$2.88 million in increased cost savings. This results in a 38.9 year payback period to recoup the \$112,039,000 investment.

As a result of ARRA ("The Stimulus Bill") in 2009-2010, many manufacturers already have affordable products that achieve a U-factor of 0.30. We therefore contend that the incremental cost to meet a U-factor of 0.30 vs. current Version 5.0 criteria is negligible.

Setting the criteria to 0.30 enables consumers to still generate over \$37 million in annual energy savings vs. Version 5.0 criteria while absorbing virtually no incremental cost. We therefore recommend increasing this criteria to 0.30 while maintaining the SHGC criteria of 0.40.

- 2) **Increase the SHGC criteria for >1/2-lite doors from 0.25 to 0.30.** The proposed criteria of 0.25 will require many door products to have glazing with a triple silver low-e coating. Since windows in the Northern Zone have no SHGC requirement, qualifying windows and doors in the Northern Zone will often have different glazing with significantly different color/visual characteristics. Such differences are very objectionable to consumers.

The photos at the end of this letter help illustrate. These photos were sent to us from a customer in the Pittsburgh, PA area. The sliding door in the bottom of each photo was provided by Pella. The windows above the door were provided by another supplier and significant efforts were made to have matching low-e glass types in both the door and the windows. Despite these efforts, the customer objected, noting that the glass in the sliding door has a purple hue whereas the glass in the windows has a green hue. This is a clear illustration of customer dissatisfaction to this type of mismatch in reflected color.

This has been a major issue with our customers in the past. In fact, Pella recently changed out our entire stock offering inventory when switching from one low-e glass to another. We made this major investment solely to avoid dissatisfying our customers.

In order to allow windows and doors to have aesthetically compatible glazing in the Northern Zone, we recommend increasing this criteria to 0.30.



- 3) **Rely on existing 3rd party structural certification programs for providing installation instructions.** Pella supports the concept of requiring that basic installation instructions be made available. However as currently written, Section 3D of the draft criteria is concerning:
- The proposed requirements could be interpreted as applying to any and all installation conditions. In particular item 3.D.vii supports such an interpretation. Manufacturers do not and cannot have readily available instructions for every situation or condition that might arise. It's not feasible to list all of the necessary hardware and tools that might be required in all the varying replacement conditions. It's also not feasible to have guidance readily available for removing all types of existing products.
 - The proposed requirement to address proper management of lead paint is unnecessary. Title 40, Part 745 of the Code of Federal Regulations (commonly known as the "*Lead: Renovation, Repair and Painting Rule*" or the "*LRRP Rule*") already addresses this topic. Requiring manufacturers to further address it in their installation instructions is not only redundant, it potentially exposes manufacturers to liability risks in the event of unintended conflicts between their instructions and the LRRP Rule. It also potentially establishes a precedent of requiring installation instructions to address other topics already addressed by federal regulations such as proper management of solvents, VOCs, particulates, other heavy metals, etc.
 - During the stakeholder's meeting on August 27, the question was raised about how EPA plans to enforce this requirement. It was suggested that EPA is considering asking NFRC accredited test labs to review and approve manufacturer's instructions as part of after-market independent verification (IVP). We contend this is not feasible. We have spoken with representatives from three NFRC accredited test labs and they have expressed significant concerns over being asked to take on such responsibility and liability.

We believe the intent of this proposed requirement can be achieved by requiring 3rd party structural certification as a prerequisite for ENERGY STAR qualification. These programs (WDMA Hallmark, AAMA Gold Label, NAMI, Keystone, etc.) already require manufacturers to have installation instructions available for certified products. We recommend EPA simply rely on these existing programs accordingly.

- 4) **Maintain the current process for future program revisions.** The Introduction in the Analysis Report indicates that the process for future revisions may not be as involved or rigorous as it has been historically. Pella Corporation contends that the current process must be maintained. The current level of interaction and dialogue between EPA and the fenestration industry is vital in maintaining a program that is both beneficial to consumers and equitable to manufacturers. Unlike other product categories (electronics, appliances, HVAC equipment) there are no federal regulations that control the threshold of fenestration performance for entry into the market. Also the suitability of fenestration for a given application is far more dependent on climate zone and orientation than is the case for other product categories. Therefore using the same process for fenestration as is used for other product categories is not necessary. We request that EPA commit to maintaining the current process for future program revisions.

Thank you for your time and consideration. We welcome the opportunity to review these points with you in more detail at your convenience.

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