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August 31, 2017

Doug Anderson  
Program Manager, ENERGY STAR for Exterior and Interior Storm Windows  
U.S. Environmental Protection Agency  
windows@energystar.gov

**RE: Comments on ENERGY STAR specification for exterior and interior storm windows**

Dear Doug:

Thank you for the opportunity to comment on the proposed ENERGY STAR® specification for Exterior and Interior Storm Windows. Since 2009, QUANTA Technologies Inc. has had a mission and passion to address the energy efficiency of existing homes and buildings, helping lead the industry in bringing the low-e storm window technology to market. This includes significant product development, leadership of a 3-year DOE research project, participation in AERC, and involvement in utility programs for consumer education and market development. Low-e storm windows and panels offer significant promise for cost effectively upgrading the energy efficiency of existing buildings, in particular providing the means to improve window performance where building or home owners will not or cannot (due to historical restrictions) utilize replacement windows.

We have reviewed the proposed specification and other documents, and are in full support of the program. We believe the proposed requirements are appropriate and will enable consumers to identify and distinguish the benefits of modern, low-e storm windows compared to less efficient storm windows that dominated the market many years ago. As a result, we believe the program will have significant impact in terms of market adoption and national energy savings.

We do not have any suggested changes to the specification or documents, and suggest the program proceed as soon as possible. We do want to offer one comment in relation to interior low-e panels. We note that EPA is not including interior low-e panels for the Southern / South-Central zone at this time, because "research suggests that interior storm windows are not an appropriate application in those Climate Zones". We would like to point out that interior low-e panels do provide energy benefits from reduced air leakage and lower U-factor in all zones, as well as other benefits such as improved comfort and reduced noise. As such, interior panels can be a very good product application in the south as well as the north, especially for windows with low solar exposure (shaded by overhangs, trees, or on the north side of the home). Nonetheless, we understand the point about low solar transmittance having the largest benefit on the exterior for southern zones, and agree with and support the EPA decision for this initial program specification.

Again, we applaud the significant efforts and research that have led to this point, and are in full support of the proposed program. We look forward to participating with the program as soon as it is launched!

Sincerely,

A handwritten signature in black ink, appearing to read 'JR', is written over a horizontal line. The signature is stylized and somewhat abstract.

Jay R. Reyher  
Chief Executive Officer