

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

September 5, 2018

Dear ENERGY STAR® for Exterior and Interior Storm Windows Stakeholder:

The U.S. Environmental Protection Agency (EPA) is pleased to share the final ENERGY STAR Version 1.0 Exterior and Interior Storm Windows Specification. EPA would like to acknowledge the ENERGY STAR stakeholders who have participated in this collaborative process. EPA has considered all stakeholder feedback carefully in developing this final specification and has summarized its final decisions on outstanding issues in this letter. In addition, EPA has provided a schedule for certifying products for this new specification.

This specification represents the first ENERGY STAR product category for storm windows. With the specification development process now complete, EPA believes that labeling storm windows as ENERGY STAR certified will help consumers to identify more energy efficient storm window products and reduce their home energy costs. An ENERGY STAR label will also help to identify an affordable option for homes where full window replacement may be difficult, such as lower-income households, low-rise multi-family households, households working with HUD or weatherization programs, and households in historic preservation districts. EPA estimates that on a national average, ENERGY STAR certified storm windows can save homeowners \$50 on their annual heating and cooling bills (about 2%), which will pay back the incremental cost of the ENERGY STAR certified storm windows (compared to clear glass storm windows) in about six years. These estimates are conservative and do not include savings from reducing air leaks from older windows, which provides additional savings but can vary substantially from house to house. Actual homeowner savings will depend on local climate, individual home characteristics, and local utility rates.

Final Stakeholder Comments

The final Version 1.0 Specification and the comments received on the final draft specification are posted at: https://www.energystar.gov/products/spec/exterior_and_interior_storm_panels_version_1_0_pd.

EPA received several comments from stakeholders on the final draft of the specification. Most of the comments submitted expressed support for the final draft specification and the additional analysis EPA conducted. EPA appreciates the support and thanks all stakeholders that provided input throughout the process.

One commenter resubmitted comments made during earlier steps of the specification development process. EPA has previously responded to these comments and its positions on these issues have not changed. In addition, EPA received comments on a few outstanding concerns which are addressed directly in this letter:

Differentiation among Low-E Storm Windows

One commenter expressed concern that the proposed criteria only differentiates between low-e storm windows and clear glass storm windows and does not differentiate better performing low-e storm windows. EPA thanks the commenter for their concern, however, as the commenter also noted, the proposed specification does include solar transmittance and air leakage as additional differentiators. There are also requirements for moisture management features and better installation instructions. Therefore, EPA believes that the specification will differentiate ENERGY STAR certified storm windows from other storm windows in a variety of ways. EPA will continue to evaluate the market

and will revisit the criteria in the future, at which time additional product differentiation factors may be included.

ENERGY STAR Label

One commenter requested that product performance information appear on the ENERGY STAR label. EPA appreciates the commenter's suggestion, but reiterates that the ENERGY STAR program, across all product categories, does not require the actual certified performance values to be included on the label. Building codes may require performance information on other fenestration products, but this is not a requirement of the ENERGY STAR program.

Plant Inspections

One commenter suggested that EPA reconsider its position not to require plant inspections for manufacturers. Again, EPA appreciates the commenter's concerns, but reiterates that ENERGY STAR does not require plant inspections for any of its programs. Instead, ENERGY STAR requires certification and verification based on product testing. Certification bodies may independently choose to require plant inspections or other requirements as part of their own certification and verification procedures, independent from ENERGY STAR program requirements.

Effective Date

The ENERGY STAR Exterior and Interior Storm Windows Version 1.0 specification will take effect immediately (September 5, 2018).

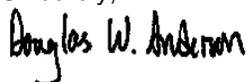
Schedule

The anticipated schedule for the ENERGY STAR Exterior and Interior Storm Window certification is as follows:

Tentative Timeline	
Final Version Effective Date	Immediately
Webinar for Certification Bodies (CBs only)	Mid-September
Product Certification Begins	Once CBs are approved by EPA

For any storm window related questions or concerns, please contact windows@energystar.gov. Thank you for your continued support of the ENERGY STAR program.

Sincerely,



Douglas W. Anderson
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U.S. Environmental Protection Agency

Enclosures:

[ENERGY STAR Exterior and Interior Storm Windows Version 1.0 Specification](#)