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U.S. EPA (Mail Code 6202A)  
Washington, DC 20460-0001

**Via Electronic Submission**

**Subject:** Final Draft, Version 1.0 ENERGY STAR for Exterior and Interior Storm Windows Specification and the Environmental Protection Agency's (EPA) response to stakeholder comments on Draft 2 and Consumer Checklist.

The Window and Door Manufacturers Association (WDMA) appreciates this opportunity to comment on the Final Draft, Version 1.0 ENERGY STAR for Exterior and Interior Storm Windows Specification and EPA's response to comments submitted on the Draft2 specification, Criteria Analysis Report, and Consumer Checklist.

While we appreciate EPA's acceptance of WDMA comments to improve the consumer checklist as the checklist is critical to ensuring consumers make informed choices with respect to energy efficient improvements to their homes, we remain greatly concerned EPA is establishing a program to simply distinguish between low-e and non-low-e storm windows. We also remain concerned the program lacks provisions for requiring plant inspections for storm window manufacturers wishing to have their low-e storm window products ENERGY STAR qualified.

Regarding our concern over low-e storm windows as the basis for ENERGY STAR qualification, as we have previously stated and repeat here, WDMA's window, door, and skylight manufacturer members are charter partners in the long standing, highly successful, and highly credible ENERGY STAR for Windows, Doors, and Skylights program. WDMA and our manufacturer members have worked hard with both EPA and the Department of Energy for two decades to ensure the success and credibility of that program, and likewise, ensure the ENERGY STAR brand does not fail in its promise to consumers.

In that regard, we maintain that if EPA is to have a meaningful ENERGY STAR program for low-e storm windows, the criteria should be set more broadly to differentiate between low-e storm window products and not just essentially differentiate storm windows with low-e glass from storm windows with clear glass. While there is the additional criteria for solar transmission (which for example is subjective in the Northern Zone by assuming a high solar gain is always better or preferred) and air leakage, EPA has made clear throughout the development process that it believes the most appropriate specification level is one that differentiates storm windows with low-e glass from storm windows with clear glass. We do not believe an ENERGY STAR program is needed to accomplish an understanding of those differences by consumers in the marketplace, and as we have previously stated, may lead to confusion over the difference between ENERGY STAR storm windows and ENERGY STAR primary windows. If there is to be an ENERGY STAR program, it should help consumers choose a more energy-efficient low-e option by providing better differentiation between low-e storm window products available to them. At the very least, the performance information that the qualification is based on should appear on the ENERGY STAR label. It is a disservice to consumers to force them to go the ENERGY STAR storm window web page to search for this information when making a purchasing decision.

Regarding EPA's response to our Draft 2 comment urging EPA to reconsider its position on plant inspections, we understand the ENERGY STAR program on the whole does not require plant inspections. However, in the case of the ENERGY STAR Window, Door and Skylight Program, EPA requires National Fenestration Rating Council (NFRC) certification as part of the criteria that must be met in order for window, door and skylight products to be ENERGY STAR qualified. Given the NFRC certification does require plant inspections, EPA is in fact, by default, requiring plant inspections for window, door and skylight manufacturers seeking ENERGY STAR qualification for their products. There is no such safeguard in the storm window program for ensuring products meet the performance levels claimed by the manufacturer and we once again assert that the program should include provisions requiring plant inspections, either directly or by default. We believe EPA's response to our comment and position on this matter skirts the issue and leaves the integrity of the storm window program vulnerable.

In summary, we believe the Exterior and Interior Storm Window Specification EPA is currently proposing still lacks attributes, as discussed above, that are critical to making the program as robust as that for the Windows, Doors and Skylights Program or ENERGY STAR product programs in general. We therefore continue to urge EPA to address these shortcomings if it is to have a truly meaningful program and one that is in the best interest of consumers.

Thank you again for this opportunity to comment further on EPA's proposed low-e storm window program and we will continue to follow further development and implementation of it.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey T. Inks", written in a cursive style.

Jeffrey T. Inks  
Senior Vice President, Advocacy