



February 12, 2016

Doug Anderson  
ENERGY STAR Residential Branch  
Climate Protection Partnership Division  
Environmental Protection Agency  
U.S. EPA (Mail Code 6202A)  
Washington, DC 20460-0001

**Via Electronic Submission**

**Subject:** Comments in response to the ENERGY STAR® For Exterior and Interior Storm Panels – Specification Framework Document

Dear Mr. Anderson:

The Window and Door Manufacturers Association (WDMA) appreciates this opportunity to comment on the Environmental Protection Agency's (EPA) intent to develop a new ENERGY STAR® product specification for exterior and interior storm panels as outlined in the framework document.

As you know, 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 nearly two decades to ensure that success and credibility, and in turn, ensure the ENERGY STAR® brand does not fail in its promise to consumers. We therefore have a strong interest in the development any new ENERGY STAR® program that will or could directly impact the ENERGY STAR® for Windows, Doors, and Skylights program.

Given the proposed new ENERGY STAR® product qualification program for exterior and interior storm panels will be a new ENERGY STAR® fenestration program, it will be directly associated with the ENERGY STAR® for Windows, Doors, and Skylights program. It is from that perspective and our long vested interest in ENERGY STAR® that we offer the following comments.

**Development of a storm panel specification is premature at this time.**

As EPA indicates in the opening "Background" paragraph of the framework document, no product can be verified as ENERGY STAR® qualified until it can be determined the product meets the applicable product performance requirements through an established third-party certification process. However, as also indicated in the document, no such certification or certification process is established at this time.

While the new Attachments Energy Ratings Council (AERC) is currently developing certification criteria and procedures that will cover storm panels, they are not yet complete and we are not aware of a date certain timeline for that to be accomplished, only that as EPA notes, the AERC expects to begin certifying sometime in early 2017. Even so, we believe additional time should be allowed once that occurs in order for the program/s to become firmly established.

At this point, we are concerned by EPA's indication that it will be able to provide consumers with ENERGY STAR® qualified storm panels with the same robust brand credibility as all other ENERGY STAR® products before it has determined how it will verify that. This is completely counter to the development of the window, door and skylight program for which performance certification criteria, process, and labeling requirements were in place and well established for many, many years at the time the window, door and skylight program was developed. We believe the same course should be followed in the development of an ENERGY STAR® qualified specification for storm panels and that development of a specification is premature if done so prior to the existence of an established third-party certification process.

**EPA should reconsider the current development timeline if it is to proceed.**

As noted above, we believe that development of a specification is premature prior to the existence of an established third-party rating and certification process for the product. Given one is on the horizon for storm panels from the AERC, it is unclear why EPA appears to be determined to develop a specification before the AERC completes its work or before it has identified any other qualified third-party certification process appropriate for an ENERGY STAR® storm panel program. We do not believe the approach outlined in Section IV. Test Methods, is sufficiently adequate to fully evaluate potential qualification and certification criteria.

In addition, EPA notes the framework document was prepared based upon conclusions drawn from a review of the seven research papers cited in the, "Opportunity and Rationale for Labeling Exterior and Interior Storm Panels with ENERGY STAR®" section of the document. Combined, those papers present well over 600 pages of research, data, and commentary. A five week comment period is inadequate time to fully review and assess those documents and in relation to the conclusions that EPA has drawn from them, as well as respond to the some twenty questions asked by EPA in the framework document. This is especially true and concerning given they are serving as the basis for developing an entirely new product program.

For the reasons stated above, we believe EPA should provide a more comprehensive explanation of why it is necessary for EPA to proceed with the development of specification criteria in advance of the completion and publication of the AERC's technical certification documents and under an otherwise accelerated timeline. EPA should also be receptive to the submission of further comments from stakeholders and other interested parties beyond the February 12<sup>th</sup>, deadline.

Furthermore, while the seven research papers do address key aspects that need to be fully considered and understood by the EPA before developing a storm panel specification, the primary participants in the research are for the most part the same. On the whole, based upon a limited review of the research, it is clear that energy efficiency performance of storm panels can vary greatly based upon conditions under which they are used, especially the primary window they are attached to, geographic region, and cardinal direction orientation. EPA should consider whether research from a broader representation of industry and of field experience is needed to better assess and determine what aspects and criteria are necessary for a sound, credible ENERGY STAR® storm panel program.

### **Conclusion**

We appreciate EPA's desire to develop an ENERGY STAR® for Exterior and Interior Storm Panels program but believe EPA should delay development of until a comprehensive rating, certification and labeling process specific to exterior and interior storm panels is completed and well established. In addition, we believe that EPA's effort to develop such a program would benefit from broader research with specific respect to an ENERGY STAR® program for exterior and interior storm panels.

We appreciate this opportunity to provide our comments and look forward to following up on them further with you.

Please let me know if you have any questions on any the matters raised.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey T. Inks". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeffrey T. Inks  
Vice President, Code and Regulatory Affairs

cc: WDMA Exterior Products Code Committee