



August 21, 2020

Doug Anderson
United States Environmental Protection Agency
1310 L Street, NW
Washington DC 20005
Sent via email: windows@energystar.gov

Re: Comments on Proposed Eligibility Criteria for Energy Star for Windows, Doors and Skylights Version 7.0

Dear Doug,

Thank you for this opportunity to provide this response for the proposed change in Eligibility Criteria for Energy Star for Windows, Doors and Skylights Version 7.0. I am writing on behalf of Alpen High Performance Products, Inc. and pleased to provide this letter of support for the proposed revisions because it makes good sense to building owners, to the nation and to firms like us in the window industry.

According to the EPA, the stated goal of the Energy Star program is to help consumers, businesses, and industry save money and protect the environment through the adoption of energy-efficient products and practices. Further, according to the EPA, the Energy Star label identifies top-performing, cost-effective products for homes and buildings.

For almost a decade, between 80% and 90% of the fenestration products on the market carry the Energy Star label. Clearly, this program--relative to window products--no longer identifies top performing, cost effective window products. Based on sustained market share, it appears to embrace more the minimum levels of performance the market should expect. We believe the new proposed guidelines offer an opportunity to better identify a tier of top performing, cost effective fenestration products to consumers.

In further support of the new proposed eligibility requirements on Version 7.0, Alpen offers the following additional perspectives:

1. Energy Star requirements have not been updated in some time. In some states new energy codes and reach codes are pushing window performance to U-values of .24 and below. With the EPA's stated goal identifying top performing and differentiated products, it is confusing to us and we believe the marketplace if Energy Star is not better than code.



2. Northern tier states are aware of products sold in Canada. The fact that Energy Star performance standards are at U-values of .21 all across Canada, but much lesser performance levels in the U.S., is confusing since many of the climates are similar. Even the proposed change in eligibility requirements for North tier states is still substantially less than these targeted Energy Star U-values in Canada.

3. Although the objectives of the Energy Star program are not necessary to promote window and door manufacturers in the United States over window and door manufacturers based outside the United States, the reality is that far less stringent Energy Star standards indirectly benefit the development of better performing window products in both Canada and, in different ways, in other regions like Europe at the expense of the United States window manufacturers. There is no significant current incentive under the Energy Star program to spur the development of significantly better products. Consequently, US consumers have flocked to the purchase of a proliferation of choices of higher performance, low cost imported (particularly from Canada and Europe) fenestration products with higher performance levels than are often broadly advertised by US manufacturers— particularly from Canada and Europe. Again, Alpen urges the EPA to simply examine the massive growth in the net trade deficit between the US and these two regions over the last decade for empirical evidence of this unintended consequence of not encouraging the development of higher performing window products through more aggressive Energy Star goals to date.

4. We are seeing explosive growth in Passive House-inspired design and performance levels and in projects with zero energy or near zero energy design objectives. These often require windows that meet the performance required by triple glazed products or meeting U-value performance ranges of .20 or below. As a result, product consumers are increasingly importing these products meeting these performance levels from Europe and Canada when they could be sold by US manufacturers if they were simply more widely available. We have actively encouraged repeatedly that the many excellent window manufacturers in the United States join our company in offering a much broader array of higher performing products to serve this explosively growing market demand as we see far too many sales opportunities where excellent US-based window manufacturer window options are not even being considered in the sales opportunity. We think this doesn't benefit the US consumer ultimately. We believe higher performance levels being encouraged by the new Eligibility Criteria in Version 7.0 of the Energy Star program is an excellent start to encourage the goal of encouraging the development by US manufacturers of even more better performing, lower cost fenestration products for the US consumer in alignment with the objectives of the Energy Star program.

5. We've already re-engineered our product and sales lines for triples (and beyond). We have made/want to make additional investments in the manufacture of higher performing products than current Energy Star. The new lower U-value requirements should create more market interest and volume sales for these products and help justify our past investment and further investments for new product lines.

6. As a smaller but innovative window company, we see no obstacles to providing the designs and solutions needed to achieve the new targeted U values. There are a range of glass options, coating options, spacer options and frame insulation options that we use now to meet the specification.

7. Many of our customers have commented on the need for more comfort. These changes to lower the U factor will enhance comfort as well. Although Energy Star criteria are evaluated mostly on energy savings, these products will make a home more resilient and comfortable, and Alpen can use that in our marketing as well.

8. In new homes triple glazing will cost more than double glazing as noted in your analysis but aside but from the energy payback you calculate it might reduce HVAC system size in new homes or renovations. Alpen would prefer homeowners invest in our window products while saving money by reducing HVAC systems for their homes.

In summary, Alpen is highly supportive of the incremental increase in the Energy Star standards proposed in the proposed Version 7.0 Eligibility Criteria. The consumer already has many choices for very high-quality, cost-effective windows produced by many excellent US-based manufacturers that will meet these new standards. We are hopeful increased demand for these better thermally performing products will continue to encourage further investment by the US industry that will allow the entire industry to meet the rapidly growing demand for these higher performing products that will ultimately benefit the consumer. We think even more availability of better thermally performing products from US-based manufacturer ultimately will further spurn growth of higher performance building in the United States and make the entire US window industry stronger and more competitive.

Sincerely,



Brad Begin, CEO