

September 3, 2021

ENERGY STAR Labeled Products Program
U.S. Environmental Protection Agency

Sent via email to: windows@energystar.gov

RE: ENERGY STAR Version 7.0 for Residential Windows, Doors, and Skylights, Draft 1 Specification

Dear EPA ENERGY STAR Windows Team,

The American Council for an Energy-Efficient Economy (ACEEE), a nonprofit research organization, develops transformative policies to reduce energy waste and combat climate change. With our independent analysis, we aim to build a vibrant and equitable economy – one that uses energy more productively, reduces costs, protects the environment, and promotes the health, safety, and well-being of everyone.

ACEEE submits the following comments on the ENERGY STAR Version 7.0 for Residential Windows, Doors, and Skylights, Draft 1 Specification released by EPA in July 2021. EPA's proposed specification represents an important step forward in the recognition and promotion of high-performance windows, doors, and skylights (WDS) that will support the broad transition to more energy-efficient and resilient homes. We appreciate the opportunity to provide our comments.

ACEEE supports the proposed specification levels.

We applaud EPA for the rigorous data analysis conducted in support of the draft specification development. The thermal performance requirements proposed represent a significant improvement over the outdated v6.0 levels currently in place and a meaningful efficiency gain across climate zones, most notably in the Northern climate. EPA's analysis shows that products meeting the proposed specification are offered by a variety of large and small manufacturers through a robust range of product lines, ensuring availability to consumers, contractors, and builders.

ACEEE encourages EPA to establish a schedule for revisiting and revising the specification within three years of the proposed v7.0 effective date.

Revision of the WDS specification is long overdue as evidenced by the high market share for ENERGY STAR WDS products (86% in 2019) and the long lag time since the v6.0 specification effective dates (January 2015 and 2016). We encourage EPA to finalize the v7.0 spec with an effective date no later than the proposed date of January 2023 and commit to a timeline for development and adoption of a stronger v8.0 specification on a much shorter interval (i.e., within three years of the v7.0 effective date).

Several developments suggest that a stronger specification will be warranted in this timeframe.

- Canada has adopted a U-value of 0.21 for its ENERGY STAR window specification providing incentives for manufacturers to increase production of products meeting or exceeding this level of thermal performance.

- DOE and the national labs are supporting manufacturers, builders, and other key supply chain partners in the development and deployment of innovative thin-triple pane windows using currently available components. These products are designed to fit into existing window frame designs making them significantly less expensive than conventional triple-pane window products and an easier upgrade for both retrofits and new construction.
- The Partnership for Advanced Windows Solution (PAWS), a public-private collaborative of federal and state agencies, national labs, industry, utilities, and efficiency organizations is developing a market transformation initiative to accelerate adoption of advanced windows across the country. ENERGY STAR will be an important component of these efforts if the specification aligns with the PAWS performance goals.

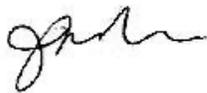
The proposed specification will deliver critical near-term carbon savings, peak demand reductions, and resilience benefits.

Windows account for close to half of thermal losses from the building envelope. Products meeting the new ENERGY STAR specification will deliver immediate energy and carbon savings and demand reductions upon installation making them an attractive opportunity for utilities and other efficiency programs seeking the most effective program investments. These products deliver noticeable comfort improvements to residents with a reasonable payback, even in the absence of incentives. The enhanced thermal performance provided by windows meeting the ENERGY STAR v7.0 specification can also help homes maintain safe temperatures for a longer period during power outages, increasing residents' ability to shelter in place.

Together these benefits will help consumers, utilities, and communities address the impacts of extreme weather events, meet climate policy objectives, and improve housing.

We appreciate the opportunity to comment on this issue and on the development of ENERGY STAR specifications for this product and the wide range of product categories covered under the ENERGY STAR brand.

Sincerely,



Jennifer Amann
Senior Fellow, Buildings Program