

Submitted Electronically

August 9, 2022

Doug Anderson
United States Environmental Protection Agency
1310 L Street, NW
Washington, DC 20005

Re: Comments and Recommendations on *ENERGY STAR*[®] Version 7.0 Window, Door and Skylight Final Draft Specification and EPA Response to Comments on Draft 2

Dear Doug,

Thank you again for the opportunity to participate in the EPA's process to consider potential changes to the ENERGY STAR Windows program and your consideration of our views. Per EPA's request, the purpose of this letter is to provide supplemental feedback, comments, and recommendations on behalf of Andersen focusing on the ENERGY STAR Version 7.0 Residential Window, Door and Skylight Final Draft Specification ("Final Draft") and EPA's Response to Comments on Draft 2 ("EPA's Draft 2 Response").

Introduction and Summary of Andersen Comments and Recommendations on Final Draft

Let me state at the outset that we appreciate that EPA listened to our comments (and those by other industry members) and partially adopted some of our recommendations to improve the Draft 2 Specification. Most notably, we appreciate the small (0.01) increase in the maximum U-factor for Windows in the North-Central Zone and the improvement to the > ½ lite door category to better match the climate zones by setting two different sets of criteria for the Northern/North-Central Zones and the Southern/South-Central Zones.

While we support these modifications to the criteria included in the Final Draft, we believe that these modifications do not go quite far enough. As a result, we think that two modest, but important further modifications can and should be made to the criteria before the Version 7.0 specification is finalized. These key improvements will serve to fine-tune the specifications for windows and glazed doors in the northern climate zones and have a positive impact on the future success of the program and continued industry participation.

Specifically, in light of the changes made in the Final Draft, we recommend that the EPA adopt the following recommendations:

- (1) Set the North-Central Zone window maximum U-factor criteria no lower than ≤ 0.26 (instead of 0.25)
- (2) Set the > ½ lite door (which would include both hinged and sliding glass doors) maximum U-factor criteria for the Northern/North-Central Zones no lower than ≤ 0.26 (instead of 0.25)

We also continue to recommend that EPA set the effective date of Version 7.0 no earlier than January 1, 2024.

Finally, we support EPA's willingness to rethink the current market study process and we encourage EPA to take advantage of opportunities for improvement based on industry feedback.

Our rationale for our final recommended modifications is as follows, as well as some brief additional comments.

Andersen Supplemental Recommended Modifications to the Final Draft

(1) Set the North-Central Zone maximum window U-factor no lower than ≤ 0.26 .

While we appreciate the change made to the North-Central Zone Window U-factor criteria in the Final Draft to ≤ 0.25 (from ≤ 0.24 in Draft 2), we strongly recommend that EPA go one step farther and raise the North-Central Zone maximum U-factor criteria for windows to at least ≤ 0.26 . (Please note that we would strongly prefer 0.27, but we support 0.26 as a reasonable compromise under the circumstances.)

First, a slight increase from a 0.25 to a 0.26 U-factor requirement is very important because it would make the manufacture and sale of ENERGY STAR products in the North-Central Zone much more feasible for a larger group of manufacturers (for those that offer similar product options that may not quite reach 0.25) by allowing these manufacturers more flexibility to offer reasonable product choices for each climate zone to consumers. Setting the value slightly higher will allow more cost-effective and lower cost options for consumers in the North-Central Zone with minimal impact on energy efficiency performance. Based on our experience, we believe that this small change could make an important impact in this zone.

Second, at 0.26, the new U-factor criteria would still be a significant advance in efficiency. This would amount to more than a 13% reduction in the current 0.30 ENERGY STAR requirement.

Third, the U-factor requirements for the North-Central Zone should be, at a minimum, no more stringent than for the Northern Zone. This would be consistent with previous ENERGY STAR Windows specifications and energy codes. With the "Equivalent Energy Performance" criteria in the Northern Zone, EPA has granted some flexibility for the Northern Zone by allowing certain windows with a U-factor up to 0.26 to qualify in the Northern Zone, yet the proposed Final Draft criteria for the U-factor in the North-Central remains slightly more stringent at ≤ 0.25 . It is hard to understand and to explain to specifiers, consumers, manufacturers and sellers of ENERGY STAR windows why a North-Central Zone city, such as Washington, DC, would require a more stringent U-factor than for a Northern Zone city such as Fairbanks, AK.

More detailed comments that support this recommendation are outlined in our previous sets of Comments, and we refer you to those comments as well, rather than repeating them here.

(2) Set the $> \frac{1}{2}$ lite door (which would include both hinged and sliding glass doors) Northern/North-Central Zones maximum U-factor criteria no lower than ≤ 0.26 .

Andersen appreciates that EPA accepted our alternative recommendation to separate the Northern/North-Central Zones from the Southern/South-Central Zones for $> \frac{1}{2}$ lite doors (which includes both sliding and hinged patio doors). However, for many of the same reasons discussed above, we remain concerned that the ≤ 0.25 U-factor is too low for the Northern/North-Central Zones.

A 0.25 U-factor is a very aggressive criteria change for glazed doors, even in the northern climate zones. We recommend that the value be set no lower than 0.26 for the Northern and North-Central ENERGY STAR Climate Zones. (Again, we would strongly prefer 0.27.) Doing so would ensure that the U-factor criteria for doors is no more stringent than for windows in the Northern Zone, would match our recommendation for the windows in the North-Central Zone, would provide more flexibility and lower-cost, cost-effective options for consumers and would create reasonable consistency. In other words, like our recommendation on North-Central windows, any incremental loss in energy efficiency from a 0.01 increase in the U-factor criteria would be more than offset by the positive impact on consumers and more robust industry participation in the program.

(3) Set the effective date of Version 7.0 no earlier than January 1, 2024.

Should EPA decide to move forward with a Version 7.0 as proposed, we respectfully request that the effective date be set no earlier than January 1, 2024. At most, this would only amount to a few additional months of delay beyond the 12-month timeline proposed by EPA.

Setting the effective date for January 1, 2024:

- Allows manufacturers more time for necessary product design changes, and just as significantly, more time to procure the equipment necessary to produce new product designs, particularly given the reality of current long lead times for delivery and installation of new production equipment
- Aligns with clean unit shipment data by calendar year versus partial year to one criteria and the other portion of the year to new criteria
- Aligns with a natural and historic beginning of year refresh for manufacturers' POP materials, website updates and product literature updates
- Would lessen confusion related to any energy efficiency tax credits or other regulatory programs that specify ENERGY STAR windows and doors

Other Issues

Andersen views EPA's ENERGY STAR Windows program as having had a substantial positive impact on efficiency and the marketplace for efficient windows and glazed doors over the past few decades and, as a result, we have fully participated in the current EPA process with the goal of promoting improvements to the EPA specification that will lead to continued success. We have offered a number of comments and suggestions that the EPA has not adopted. We respectfully disagree with EPA on many of these points and believe that many of these suggestions continue to have merit and hope that EPA will reconsider them. We will not reiterate all of them here, but simply refer EPA to our previous sets of comments. As an illustration and important example, we continue to support

moving IECC Climate Zone 5 to the North-Central Zone (with the U-factor set at least as high as 0.26 as recommended above), which in our judgment is more reasonable and provides a better fit.

Conclusion

We thank you for reviewing and carefully considering our comments and concerns regarding the Final Draft and urge you to at least adopt our limited recommended modifications. We reserve our right to update and change our views on these and any other issues as this matter progresses. Please let me know if you have any questions or comments or would like to discuss any of our analysis or recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark T. Mikkelson". The signature is fluid and cursive, with a large, stylized initial "M" and "T".

Mark T. Mikkelson
Director, Corporate Regulatory Affairs