



August 27, 2021

Via Email

Doug Anderson  
U.S. EPA ENERGY STAR™ Program  
[www.energystar.gov](http://www.energystar.gov)

Dear Doug Anderson:

The State of California has a long history of partnering with agencies, programs, and policies of the Federal government to achieve state, regional, and national goals with respect to energy efficiency and carbon emissions. The California Energy Commission (CEC) has the lead responsibility for formulating plans to define these goals and then supporting and implementing the programs needed to achieve them with private and public partners. One of our focus areas has been energy use in newly constructed and existing buildings, with the goal of doubling energy efficiency by 2030 and achieving economy-wide carbon neutrality by 2045. Within buildings, there has been a historical focus on lighting and HVAC. Improvements are being seen in the building envelope, specifically windows, as an opportunity and a challenge to ensure that the state can cost effectively meet its long-term goals, with dramatic emphasis on building decarbonization. An efficient building envelope, including high efficiency windows, is critical to ensure that our buildings are resilient and responding well in both heating and cooling climate zones, even as the climate is changing.

We were pleased to see EPA release its Version 7 proposal for ENERGY STAR™ windows, and we are fully supportive of your plan to adopt new thermally improved window products as outlined in your presentation. The underlying technical work that was completed in support of the proposed requirements is extensive and convincing, not only in terms of savings potentials but also in terms of the cost data and technology readiness assessment that you presented. Your conclusions support our experience in California and the new research program we launched last year with LBNL to field test high performance, thin-triple windows in existing single and multifamily homes in several climate zones. These replacement windows have thermal properties like the new Northern zone EPA specifications. The field testing found energy and comfort benefits in most of the diverse climates in California. For newly constructed housing in California, some of our builders are finding that they can meet overall building performance requirements less expensively using triple glazed windows rather than using other mechanical and envelope measures. The

builders can also combine these windows with other measures to create “buildable packages” that suit their needs while complying with the code. The recently adopted *2022 California Building Energy Efficiency Standards* will also increase demand for these windows in the state. Some of these cost-efficient windows are made and sold in California and we are confident that the window industry can expand their availability across the country.

CEC also works with utilities and other public/private partners in a wide range of education and training programs, as well as rebate and incentive programs, to stimulate market transitions. Having a new set of more stringent window energy performance specifications under the ENERGY STAR label, will make it easier for specifiers and the full supply chain to ensure that product is available as needed and that compliance and certification is simple.

We look forward to seeing EPA move the new V7 window proposal into practice. We stand ready to further support the approval process and to work with EPA on the ultimate implementation challenges. Please contact my staff if you need additional information on these topics.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Andrew McAllister", with a long horizontal flourish extending to the right.

J. Andrew McAllister, PhD  
Commissioner  
California Energy Commission  
715 P Street  
Sacramento, California 95814