



To: windows@energystar.gov

From: Chris Duffrin, President, Center for Energy and Environment

Isaac Smith, Residential Program Development Manager, Center For Energy And Environment

RE: Comments related to ENERGY STAR Residential Window, Door and Skylight Version 7.0, Draft 2

Date: 3/23/2022

Center for Energy and Environment (CEE) respectfully submits the following comments related to ENERGY STAR Residential Window, Door and Skylight Version 7.0, Draft 2.

This update is well supported and overdue

As evident by ENERGY STAR's 89% residential window market share in the northern climate zone, CEE believes that an update to the ENERGY STAR window specification is long overdue. ENERGY STAR should represent the highest performing products, but the current specification falls short of that standard. Numerous manufacturers have certified products that meet the proposed specification either using a third pane or other innovative window technology pathways (low-e coatings, foam filled frames etc.). We believe that these products should represent the required level to attain the ENERGY STAR label.

The level of analysis conducted by EPA during this process has been thorough. CEE appreciates EPA's investment of time and resources that supported a modeling update and the resources developed for Draft 2. In the future, we recommend a more aggressive process to advance the specification sooner, ensuring that ENERGY STAR products continue to represent the top tier of performance.

Advancing window technology will be critical to the future of energy efficiency

CEE is one of the leading energy efficiency researchers and program implementers for home retrofits, especially in cold climates. Efficiency progress in our state has been led by lighting savings, an opportunity now on the decline. As we work to design and implement the next iteration of energy efficiency programs, we will focus on energy savings through previously untapped product groups. This new specification will allow states like Minnesota to successfully launch and implement market transformation and efficiency programs that target high efficiency windows, opening the door to more energy savings for customers.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Duffrin', written over a light blue circular stamp.

Chris Duffrin, President

A handwritten signature in black ink, appearing to read 'Isaac Smith', written over a light blue circular stamp.

Isaac Smith, Residential Program Development Manager
212 3rd Avenue North, Suite 560 • Minneapolis, MN 55401
www.mncee.org • main 612.335.5858 • fax 612.335.5888