



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 on Proposed ENERGY STAR V7 Final Draft Specification

Date: 8/9/2022

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

As one of the leading energy efficiency researchers and program implementors for home retrofits, especially in cold climates, CEE appreciates the level of analysis conducted by EPA and the thorough stakeholder engagement process that has accompanied the development of this specification. We believe that the increased performance requirements outlined in version 7.0 are needed to drive the window market forward to increase the availability of high-performance windows, and allow states like Minnesota to successfully launch market transformation and efficiency programs that target these products, opening the door to more energy savings for customers

As stated in our comments supporting Draft 1 and 2, CEE believes that an update to the ENERGY STAR window specification is long overdue. ENERGY STAR should represent the highest performing products and as evident by ENERGY STAR's 89% residential window market share in the northern climate zone, the current specification falls short of that standard.

High performance windows present a significant savings opportunity. CEE works with new-home builders on utility rebate programs throughout Minnesota and builders who are striving to go beyond code often reach a limit on the savings they can achieve due to the cost and availability of higher performing window products. CEE believes that an update to the ENERGY STAR specification that is targeted at a U-value of 0.22 will help increase the availability of these products and make it easier for builders to build more energy efficient homes.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Duffrin', with a stylized flourish at the end.

Chris Duffrin, President

A handwritten signature in brown ink, appearing to read 'Isaac V. Smith', with a stylized flourish at the end.

Isaac Smith, Residential Program Development Manager