

August 20, 2021

To Whom It May Concern:

Thank you for allowing ComEd the opportunity to comment on the Version 7.0 of the ENERGY STAR Residential Window, Door, and Skylight Draft 1 Specification released on July 7, 2021.

ComEd is a unit of Chicago-based Exelon Corporation, a Fortune 100 energy company with approximately 10 million electricity and natural gas customers. We are an energy delivery company, managing more than 90,000 miles of power lines in an 11,400-square-mile territory across northern Illinois, and providing electricity to more than 4 million customers. ComEd offers an extensive portfolio of energy efficiency programs designed to help our customers save money and enjoy improved living and working conditions, and participates in regional and national market transformation initiatives to advance energy-efficient emerging technologies.

Comments

ComEd is very interested in ways to improve customer comfort and bolster the efficiency of homes in our North climate zone, which experiences both very cold winters and very hot summers. Although windows represent only 7% of a home's envelope area, windows make up about 50% of the envelope load for heating in a new IECC code compliant home. Improvements in window technology therefore afford important opportunities for increasing the thermal integrity of homes and enabling homes to exceed IECC code. An ENERGY STAR® specification will provide clarity and direction to the various actors in the market, helping to drive adoption.

ComEd is working with the natural gas utilities in our territory to develop a market transformation program focused on advanced windows in Illinois and is currently in the process of local market research to better understand window purchasing decisions across the whole supply chain, from customer to manufacturer. Establishment of high-performance revised specifications for windows will help drive demand and address some of the barriers to high-R (low-U) window adoption. These barriers include lack of awareness, limited availability, cost premium, lack of competition, and motivation to sell higher performance window products.

Advanced windows, as well as other envelope measures, will help ComEd drive deeper and longer lasting energy savings for our customers, to improve resiliency, lower customer energy bills, and provide a more comfortable living environment. Thermally improved windows will be fare more resilient during power outages or extreme weather events, which can help make ENERGY STAR® a relevant factor in resiliency and equity discussions.

Summary

Thank you again for the opportunity to submit comments on this draft specification. To recap, ComEd submits the following comment for the Draft 1 specification:

- EPA should proceed with the levels proposed now as this sets the stage for further technical improvements that allow ENERGY STAR to be a relevant brand for windows well into the future.

Please contact Rick Tonielli at 630-891-7420 or via email at Richard.Tonielli@ComEd.com with questions about our comments and suggestions.

Sincerely,

A handwritten signature in black ink that reads "Denise A. Munoz". The signature is written in a cursive, flowing style.

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