

April 11, 2022

Mr. Douglas Anderson
ENERGY STAR® Program
US Environmental Protection Agency
Washington, DC 20460

Dear Mr. Anderson:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the ENERGY STAR® Version 7.0 Window, Door, and Skylight (WDS) Draft 2, released by the Environmental Protection Agency (EPA) on February 14, 2022.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR® Program. CEE members are responsible for ratepayer-funded efficiency programs in 38 US states, the District of Columbia, and four Canadian provinces. In 2019, CEE members directed approximately 70% of the \$9.3 billion in energy efficiency and demand response program expenditures in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR, so it may continue to serve as the national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

Proposed Specification Provides Meaningful Label to Differentiate High Performance Fenestration

CEE reinforces our overall support for and appreciation of this EPA label to distinguish window, door, and skylight products that can deliver meaningful energy savings for efficiency programs across North America. While CEE recognizes that setting

performance levels for this ENERGY STAR product category remains challenging due to cost effectiveness, members assert that windows are a critical end measure for reaching decarbonization objectives. The overall tightness of a building's envelope is the central backbone for ensuring overall performance, and fenestration is critical to achieving a well-insulated home. As of 2021 there were 29 CEE members promoting efficient windows as a standalone offering, with additional promotion through new construction programs and performance-based whole home offerings.

Many state and local performance baselines for fenestration products are rising, which reduces the delta of savings for Version 6.0 ENERGY STAR qualified windows, doors, and skylights in these regions. Some examples of those increased levels include the 2018 and 2021 International Energy Conservation Code® (IECC), Title 24 in California, standards in some Northern climate states or jurisdictions, and the Pan-Canadian Framework on Clean Growth and Climate Change. Having a meaningful differentiation of products in the market will therefore continue to be an important tool towards achieving insulated and high performing building shells.

We support the technology neutral pathway that EPA continues to espouse in this proposed specification, as it enables market innovation and advancement without prescribing component requirements such as frame options, glazing configurations, coating options, spacers, and gas fills. This approach helps facilitate innovation in a space where there remains technological potential beyond the current proposed levels, as supported by the supplementary data included in EPA's analysis for the revision. We appreciate EPA's commitment to push performance in this revision and believe the identified levels to be appropriately stringent for providing meaningful differentiation.

CEE would once again like to thank the EPA for the opportunity to comment on the ENERGY STAR Version 7.0 Window, Door, and Skylight Draft 2 Specification. Please contact CEE Principal Program Manager Alice Rosenberg at 617-337-9287 with any questions about these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "John Taylor". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Taylor".

John Taylor
Executive Director