

[Comments extracted from email and formatted for publication]

From: Alice Rosenberg

To: windows@energystar.gov

Sent: March 11, 2015

Subject: RE: Stakeholder Feedback Reminder for ENERGY STAR Windows, Doors, and Skylights

Hi Doug and Brian,

Yes, I expect CEE will develop formal comments for future stages, and look forward to working with you!

I actually received some member input shortly after e-mailing you yesterday. These are only from one program administrator, but may be useful for EPA to have on record. The observations raised are summarized below:

- In terms of market differentiation, this member encourages **lowering the U-factor criteria** in order to encourage higher-performing windows. Their utility window program does not use ENERGY STAR, but instead requires U-factors of 0.25 or lower. And there is significant customer interest in their triple-pane window program (U=0.22 or less). ENERGY STAR is not a very high-performance window in their market these days.
- If storm windows can be reliably tested for performance, ENERGY STAR might consider **qualifying storm windows** within the program.
- An inherent weakness of the ENERGY STAR program is that the **installation quality is not really considered**. This can result in nice windows being installed with air leaks, or with non-energy performance issues such as not stopping bulk moisture, or installing with weep holes upside down.
- This member feels that cost **effectiveness should not be a strong metric** for setting ENERGY STAR qualification levels. Many costs are ignored (such as the environmental cost-savings from energy savings, and the environmental costs due to manufacturing). And the statement “purchasers will recover their investment in increased energy efficiency within a reasonable amount of time” seems to ignore the fact that windows are very often installed for aesthetic reasons.
- The **tax credit situation for 2014 was really a problem**. Retroactively approving ENERGY STAR products *after* purchasers made their decision was not great with respect to policy (not sure what role EPA had in that decision.)
- In this member’s experience, ENERGY STAR-rated **doors are not terribly well labeled for purchasers** and could be improved with respect to .

CEE has not vetted these comments with our membership; I know some are more regionally specific (U-factor criteria) while others are ones that the Committee highlighted in past letters to EPA (installation considerations).

I know you are looking for comments by this Friday. Hopefully the above notes are helpful for EPA's process. If you would like additional information or have follow up about any of the items, please be in touch.

Thanks again!
Alice

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