

September 1, 2021

Mr. Doug Anderson
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Subject: ENERGY STAR Version 7.0 Residential Window, Door, and Skylight Draft 1
Specification and Draft 1 Criteria and Analysis Report.

Dear Mr. Anderson:

Cornerstone Building Brands (Ply Gem[®], Atrium[®], Simonton[®], Great Lakes[®] Window, Prime Window Systems, Silver Line[®] and American Craftsman[™]) would like to thank you for giving us the opportunity to provide feedback on your ENERGY STAR Version 7.0 Residential Window, Door, and Skylight Draft 1 Specification and Draft 1 Criteria and Analysis Report. Cornerstone Building Brands continues to be committed to providing cost-effective, energy efficient solutions to our customers through our long-standing participation in the ENERGY STAR and ENERGY STAR Most Efficient programs. We have reviewed the documents provided and would like to direct the EPA's attention to areas we believe need to be discussed further.

The first issue we would like to discuss is regarding the 0.35 U-value being used as a baseline for calculating payback. We assume this was a value from the NFRC CPD data. However, our actual sales volume shows the majority of our U-Values sold fall in the 0.29-0.31 range. According to the July 27th stakeholder meeting, the EPA asserted there was a 90% market share of ENERGY STAR windows in the Northern Zone. With that much market share we would have expected the EPA to use current ENERGY STAR Version 6.0 values as the baseline in this model. We believe that this needs to be taken into consideration and the payback model should be revisited.

Secondly, the proposed values in the North and North-Central WILL require substantially more materials, most notably triple glazed Insulating Glass Units (IGUs) . The current labor and supply chain landscape makes it difficult to virtually impossible to add labor, additional glass, and materials to our products. Glass manufacturers have indicated that there is not a sufficient supply of glass to support the increased requirement of triple glazing. Our industry is already experiencing supply chain shortages and delays in glass and IGU spacer materials.

Additionally, the EPA's current payback model does not take into account increased manufacturing costs or the additional strains on an already limited material supply. These costs will also necessarily adversely affect availability and increase the prices of windows to consumers. We feel that the payback model should reflect an increased price for triple glazing due to supply and demand.

The windows industry needs additional time for the economy and supply chain deficiencies in glass, materials, and labor to recover prior to implementing this substantial change. If the proposed values

remain in such a way that triple pane IGUs are the primary solution for the North and North-Central zones, Cornerstone Building Brands proposes that the implementation of Version 7.0 be delayed until at least January 1, 2024.

Sincerely,



Travis Arthur
Manager – Test and Compliance