

From: Fred Gordon
To: windows@energystar.gov
Cc: Tara F. Crookshank; Thad Roth; Marshall Johnson; Phil Degens; Elaine Miller
Subject: RE: Proposed new prescriptive specification for EnergySTAR (c) residential windows
Date: Wednesday, August 11, 2021 11:40:44 AM

Hello, EPA!

I'm Fred Gordon, Director of Planning and Evaluation at the Energy Trust of Oregon. I'm writing to comment on the proposed revised EnergySTAR © windows specification. Thank you for requesting these comments.

Energy Trust delivers efficiency and renewable energy programs for customers of Oregon's investor owned utilities, who serve about 75% of electric load and all of gas load in the state. Over the years we have found the EnergySTAR © designation useful for distinguishing efficient equipment in many different markets.

Based on an element of their grant agreement with the Oregon PUC, Energy Trust **does not** advocate policy positions. However, we can say that If EPA sets the proposed Northern Tier specification at the currently proposed level, Energy Trust would use that level as the specification for a window efficiency incentive. It appears to be practical and could be highly cost-effective in the long-run, given that the imbedded manufacturing costs to produce the better window (compared to double pane) seem modest.

We are currently developing partnerships and initiatives to reach limited income customers who are particularly vulnerable during extreme weather. We are considering the potential for including advanced windows, such as those specified, in these program initiatives. Homes with thermally improved windows can be more resilient during power outages or extreme weather events such as those that Oregon has experienced this summer.

Thanks for maintaining EnergySTAR as a quality brand for energy efficiency all these years; and for considering this comment.

Regards;

Fred Gordon
Director of Planning and Evaluation
Energy Trust of Oregon