

## Julia Madey

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**From:** Fred Gordon <Fred.Gordon@energytrust.org>  
**Sent:** Thursday, March 24, 2022 4:55 PM  
**To:** windows@energystar.gov  
**Subject:** FW: ENERGY STAR Windows 7.0 comments on PAWS

### Fred Gordon

*Director of Planning and Evaluation*

Energy Trust of Oregon  
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**From:** Fred Gordon  
**Sent:** Thursday, March 24, 2022 1:55 PM  
**To:** 'windows@energystar.gov.' <windows@energystar.gov.>  
**Cc:** Elaine Miller <EMiller@nea.org>; Marshall Johnson <Marshall.Johnson@energytrust.org>  
**Subject:** ENERGY STAR Windows 7.0 comments on PAWS

March 24, 2022

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. We appreciate the time and resources that EPA dedicated to Draft 2 of the specification.

Energy Trust delivers efficiency and renewable energy programs for customers of Oregon's investor-owned utilities, who serve about 75% of electric load and nearly all of gas load in the state. 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 Northern Tier specification at the currently proposed level, Energy Trust would align a program specification at that level and provide enhanced incentives, starting in 2023. 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*

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