

January 19, 2023

Doug Anderson
U.S. Environmental Protection Agency
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ENERGY STAR® Labeled Products
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Dear Doug:

On behalf of the 350-member companies of the Fenestration and Glazing Industry Alliance (FGIA) representing manufacturers of residential and commercial skylights, tubular daylighting devices, windows, doors, and the components that go into them, including glazing, the following comments are provided on EPA's proposed specification for the new ENERGY STAR® Most Efficient program for residential skylights and tubular daylighting devices (TDDs).

FGIA's membership includes 13 of the 23 skylight and TDD manufacturers listed in the National Fenestration Rating Council (NFRC) Certified Products Directory (CPD), who manufacture and distribute these products domestically, and throughout North America and the world. Their viewpoints are included in these comments, along with those of FGIA members who manufacture glazing, windows, and doors to present an integrated perspective.

FGIA members appreciate that EPA has proposed this new Most Efficient program to allow American consumers to choose energy efficient skylights, and to quickly qualify for tax credits starting in 2023, as part of the amendments to Section 25C of the Internal Revenue Code, as authorized under the Inflation Reduction Act.

FGIA also appreciates the fact that EPA took industry input, including that from FGIA members who manufacture skylights and TDDs, into account in developing this new program specification.

FGIA recommends the following:

Climate Zones	U-factor (BTU/hr•sqft•°F)	SHGC
Northern	≤0.41	Any
North-Central	≤0.45	≤0.23
South-Central		
Southern		

FGIA appreciates the two-tiered approach to U-factors proposed by EPA for the residential skylight and TDD program. It is a positive move to gear U-factors to the different climate zones.

FGIA's proposal is 10 percent more stringent than ENERGY STAR Version 7, and 18 percent more stringent than Version 6. When comparing ENERGY STAR Version 6 products to Version 7 products, it is important to note that Version 6 criteria will be in place for 10 months of this year, until October 23, 2023.

FGIA continues to connect with the National Fenestration Rating Council (NFRC) staff to help ensure that skylight and TDD data on which this new proposed specification is based represents skylights tested at 20 degrees, rather than vertically. That is especially important as a new Most Efficient program is established, and for future iterations.

As supply chains continue to be strained for components used in manufacturing skylights and TDDs, it will be important to establish an initial specification that will allow consumers to choose and use double-pane fenestration products where possible, rather than requiring triple pane, which may require some manufacturers to hastily redesign their products and source different materials and may position more energy-efficient products outside of the budgets of residential consumers. If products must be redesigned, sufficient lead time to redesign, test, manufacture, distribute and market new designs is necessary. It will be essential to launch the initial ENERGY STAR Most Efficient program for skylights and TDDs at a realistic starting point that provides significant energy savings over the base ENERGY STAR program yet does not place products out of the reach of residential consumers from a cost versus benefit standpoint in terms of projected energy savings.

FGIA understands that EPA reviews criteria for ENERGY STAR Most Efficient programs for fenestration annually. That will allow for future review and adjustment of criteria as EPA works together with industry input in establishing future criteria. As longtime leaders in providing the finished products, components and expertise that has helped stimulate demand for the ENERGY STAR brand for fenestration, FGIA members look forward to our continued partnership with EPA and ENERGY STAR to help advance interest in the new ENERGY STAR Most Efficient skylights and TDD program and its adoption by Americans.

If you have questions about the information provided by FGIA or would like to discuss it further with our stakeholders, please email me at kkrafka@fgiaonline.org. Thank you.

Sincerely,



Kathy Krafka Harkema
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