



**To:** [windows@energystar.gov](mailto:windows@energystar.gov)

**From:** Greater Minnesota Gas, Inc. (GMG), PO Box 798, Faribault, MN 55021

**RE:** Comments related to ENERGY STAR Residential Window, Door and Skylight Version 7.0

**Date:** 8/20/21

Greater Minnesota Gas (GMG) respectfully submits the following comments related to ENERGY STAR Residential Window, Door and Skylight Version 7.0.

Greater Minnesota Gas is a natural gas utility that serves rural Minnesota. We strongly support the proposed specification update outlined in version 7.0. We believe that more efficient windows are needed to increase energy efficiency savings in our service territory. Currently, high performance windows (U-value of 0.22) are not readily available or affordable, but they are needed as windows typically represent 10% of a home's building envelope, but account for 30%-40% of the home's heat loss in the winter.

We believe that this update is needed to encourage manufactures to produce and supply more high-performance windows. It will also increase demand for this product from consumers, as ENERGY STAR is a well-established brand and has become the market norm for window purchases. An increased supply from manufacturers accompanied by demand from consumers will help drive down the cost of high-performance windows, making this a great energy savings opportunity for our customers.

Sincerely,

A handwritten signature in black ink, appearing to read "Nikki Kupser", written over a horizontal line.

Nikki Kupser

Business Development and CIP Manager