



March 28, 2022

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

Subject: ENERGY STAR Residential Window, Door, and Skylight Version 7.0 Draft 2 Response

Dear Mr. Anderson

JELD-WEN has long been a supporter of the ENERGY STAR® for Windows Doors and Skylights program. As an ENERGY STAR Partner since 1998, we believe that periodic review and update to the specifications are necessary to meet the goal of home energy savings which are real benefit to the occupants.

JELD-WEN also believes that where cost effective and affordable technology is commercially available, the payback to consumers on their fenestration investment must not be more than 10 years.

Points of concern with ENERGY STAR V7 Draft 2

- JELD-WEN supports the EPA's removal of the Northern Zone Climate "islands" in California, North Carolina, and Virginia. It is much easier to manage labeling and distribution where there are consistent boundaries.
- JELD-WEN is concerned that the Equivalent Energy Performance allowances are allowing less stringency in certain cases for the Northern Zone than for the North Central Zone.
 - North Central U-Factor ≤ 0.24 and SHGC ≤ 0.40
 - Northern Equivalent Energy Performance: U-factor = 0.24 and SHGC ≥ 0.35
 - Effectively, a Northern Zone window with a U-Factor = 0.24 and an SHGC between 0.35 and 0.40 is accepted as ENERGY STAR qualified in both Northern and North Central Climate Zones.
 - To rectify this, we propose a modification to the North Central Climate zone to be U-Factor ≤ 0.26 and SHGC ≤ 0.40 .
- JELD-WEN is concerned with moving sliding glass doors from the Window Criteria back into the Door Criteria.
 - As we have previously proposed to you, JELD-WEN recommends that all doors and windows be merged into one table, all meeting the same criteria in their respective Climate Zones.
 - Merging criteria will simplify decision making and increase level of understanding across the construction industry on fenestration criteria to meet EPA's Energy Star V7.
 - NRCAN's Energy Star program in 2020 followed this same approach merging the window and door criteria.
 - That said, this Draft 2 proposal is concerning. Having one U-Factor criteria for all > 1/2 lite doors in all climate zones will require sliding glass doors in the South Central and Southern



- Climate Zones to perform to a more stringent requirement than the windows that are installed into the same walls.
- JELD-WEN proposes that EPA split the > 1/2 lite criteria into two zones, Northern and North Central with a maximum U-Factor of 0.25 and the South Central and Southern Zone with a maximum U-Factor of 0.28.
 - This proposed change will allow for glass packages that more closely match between windows and doors.
 - Lastly, JELD-WEN is concerned with the proposed implementation of the Version 7 ENERGY STAR Certification criteria. With final language planned for release in June or July 2022, that would mean, per the current EPA schedule of implementation one year after the final version is released, the effective date would be mid-summer, 2023, which is in the middle of our industries busiest production time as well as the construction industries busiest season. These are obviously challenging times for all of us with high inflation, COVID restrictions, and workforce factors as well as the unsteady supply chain issues confronting our industry. To better coordinate the changed implementation to the new Version 7 criteria, we ask the EPA to strongly consider the effective date be moved out to 1/1/2024.

JELD-WEN appreciates the opportunity to provide comments on the drafted changes to the ENERGY STAR Version 7 specifications. JELD-WEN is very conscious of our countries growing energy and climate change concerns and is investing heavily in the new technology needed to bring out products that will meet the growing demand for energy saving windows and doors.

Our Partnership with the EPA and the ENERGY STAR for Windows, Doors and Skylights program remains steadfast.

Please let us know if we can provide clarification to any of the points we have raised.

Sincerely

A handwritten signature in black ink that reads 'Steve Strawn'.

Steve Strawn
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