



August 9, 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 Final Draft Version 7.0 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 offer real benefit to the occupants and to our environment

JELD-WEN supports the criteria changes provided in this latest version and would ask for your consideration of these few additional modifications to the criteria

Points of concern with the Final Draft Version 7:

- JELD-WEN recommends changes to the North Central Window U-factor from 0.25 to 0.26. We do appreciate the adjustment from Draft 1 criteria of 0.24, however there is still an imbalance where the criteria for windows in the North Central Zone are more stringent than in the Northern Climate zone when the Equivalent Energy Performance option is used. We believe this minor modification will lead to a better balance and avoid the inevitable questions of why the North Central zone is requiring a more stringent performance than the Northern zone.
- JELD-WEN recommends the U-factor requirements for doors > ½ lite in the Northern and North Central zone should be adjusted to better align with the window criteria, set at a maximum U-factor of 0.26. This will also align with the equivalent energy performance Northern criteria for windows that often use the same glass package.
- JELD-WEN appreciates the EPA taking a more active roll in collecting ENERGY STAR Partner shipment data. We are currently looking at various ways to aggregate the information and how it will be collected. JELD-WEN uses multiple certification programs for our products and would suggest that any of these recognized 3rd party entities could become a qualified collector of the data, or we may prefer to optionally submit it directly to the EPA. Please leave that option for compliance open to the partners.
- Recognizing that this is only a draft, and the final version will be “cleaned up” we ask you to consider in formatting the Criteria page, you include the footnotes for air leakage U-factor and SHGC for all the products in one note, rather than under each Table for a much cleaner looking page.
- Lastly, JELD-WEN remains concerned with the proposed implementation of the Version 7 ENERGY STAR Certification criteria. With final language anticipated for release in the Fall of



2022 and based on the current EPA implementation schedule of one year after the final version is released, the effective date would be mid-Fall, 2023. While we recognize that the implementation date has yet to be announced, please consider that the Fall is still during our busiest production season. To better coordinate the change over to the new Version 7 criteria, and to be the least disruptive to our business, we ask the EPA to strongly consider the effective date be moved out to 1/1/2024. This should have minimal impact on the program and will make transitioning products and the associated marketing collateral much easier during the “off season”.

Again, JELD-WEN appreciates the opportunity to provide comments on the final drafted changes to the ENERGY STAR Version 7 specifications.

These are obviously challenging times for all of us but as we approach the future with the optimism of new technology providing better performing windows and with the ENERGY STAR brand leading the way, JELD-WEN’S 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

Program Manager | Codes and Regulatory Compliance
JELD-WEN Inc,