From: Joe Krznarich

To: Anderson, Doug; windows@energystar.gov

Cc: BBooher@drintl.com

Subject: RE: ENERGY STAR Version 7.0 **Date:** Wednesday, July 7, 2021 5:43:34 PM

Just finished reviewing Energy Star version 7.0 proposed specification.

These new proposed values will dramatically increase the cost of the product for both manufacturers and consumers. It forces the product into triple glaze territory or some other expensive glass technology which make manufacturing the product more expensive and make the product more expensive for the consumer. The proposed values should not be set as low as they are.

Joe Krznarich

Product Development Engineer / Testing & Certification

jjkrznarich@lincolnwindows.com https://lincolnwindows.com

Tel: (800)967-2461 Ext. 166



Additional comments from 7/7/21

Doug,

I submitted the comments to windows@energstar.gov as instructed on the email I received from the EPA. The confidentiality statement is put on our e-mail by our IT department. I have no control over it.

I hope your organization realizes that the proposed U-values are unrealistic/impossible for an aluminum clad window with dual glaze insulated glass. Depending on the product design, the values may not even be attained by using triple glaze. This forces both the manufacture and consumer to pay considerably more for a product that has very little pay back compared to what

is being spent on the product.

Joe Krznarich

Product Development Engineer / Testing & Certification

jjkrznarich@lincolnwindows.com https://lincolnwindows.com

Tel: (800)967-2461 Ext. 166



Additional comments from 8/4/21

The new U-value requirements are unreasonable.

- It forces the manufacturer into having to use triple glaze glass which results in higher costs for both the manufacturer and consumer due to the weight, thickness and added pane of glass.
- Triple pane glass products are less reliable than double pane glass products. Triple pane is more prone to seal failures.
- From a consumer standpoint the energy savings is so small it will take approximately 20 years to recoup the upcharge to go from a double pane window to a triple pane window.
- May require special installation due to the additional weight of the product.

Joe Krznarich

Product Development Engineer / Testing & Certification

jjkrznarich@lincolnwindows.com https://lincolnwindows.com

Tel: (800)967-2461 Ext. 166

