



August 8, 2022

Doug Anderson - Program Manager
ENERGY STAR for Windows, Doors, and Skylights
U.S. Environmental Protection Agency

Sent via email: windows@energystar.gov

Dear Doug,

Marvin appreciates the opportunity to review and submit comments on *ENERGY STAR Version 7.0 Residential Window, Door and Skylight Final Draft Specification* issued on July 19, 2022.

We appreciate that EPA has adjusted the Final Draft Specification based upon industry feedback. However, we feel that there are additional adjustments that will improve the Program for manufacturers and consumers which we have outlined below in our comments.

Marvin offers these comments on key topics that we feel continue to be important to our ENERGY STAR partnership. We also support many of the comments that have been and continue to be raised by both WDMA and FGIA on behalf of industry members.

Here is a summary of our concerns:

1. The start of ENERGY STAR Version 7.0 should be effective on January 1, 2024, not during the middle of a calendar year. One of the reasons is that this will cause confusion for consumers who have purchased ENERGY STAR products and apply for tax credits (25c).
2. The NC Zone requirements for windows **should not** have more stringent requirements (0.25 U-factor) than the least stringent Equivalent Energy Performance in the Northern Zone (0.26 U-factor). A consumer in Fairbanks, AK would be allowed to have a less stringent U-factor than a consumer in Topeka, KS.
 - 2.a) Likewise, the > ½-Lite Door requirement – should match the least stringent Equivalent Energy Performance requirement for windows at 0.26 U-factor and our industry's request that the NC zone for windows to be changed from 0.25 U-factor to 0.26 U-factor.

3. The Equivalent Energy Performance Table should match how the table has looked in current and previous versions when using the same performance requirements:

Current Final Draft			Revise as follows		
= 0.23	≥ 0.35	Equivalent Energy Performance	= 0.23	≥ 0.35	Equivalent Energy Performance
= 0.24	≥ 0.35		= 0.24	≥ 0.35	
= 0.25	≥ 0.40		= 0.25	≥ 0.40	
= 0.26	≥ 0.40		= 0.26	≥ 0.40	

Again, Marvin appreciates the opportunity to review and comment on the Final Draft Specification. We look forward to our continued partnership with ENERGY STAR.

Respectfully submitted,

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