

March 17, 2022

Doug Anderson  
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U.S. Environmental Protection Agency  
Email: windows@energystar.gov

RE: ENERGY STAR Residential Windows, Doors, and Skylights Version 7.0 Draft 2 Specification

Thank you for the opportunity to provide comments during the ENERGY STAR 7.0 development process.

After publication of the ENERGY STAR Version 7.0 Residential Windows, Doors, and Skylights Draft 1 Specification, Masonite did not find it necessary to submit public comment because we were in full agreement with the EPA's logic and conclusions for swinging doors outlined in the associated Criteria Analysis Report. However, we were surprised when Draft 2 was published and the EPA did not follow their own analysis and departed from the logic and conclusions drawn in Draft 1. Specifically, the U-factor for >1/2-lite swinging doors has been dramatically lowered from Draft 1 with no further analysis or logic provided. It appears that in response to public commenters, EPA grouped sliding doors with swinging doors and elected not follow their own analysis and logic for swinging doors. We strongly disagree with this approach.

As noted by the EPA, the proposed Draft 1 criteria for doors would reduce energy costs for consumers in all climate zones. While the household energy savings are small, these savings would add up to 1.16 trillion Btu on a national level. Swinging doors, as the product category that the EPA has analyzed the least and the EPA believes has the least impact on household energy use, will have the more stringent U-factor criteria in the ENERGY STAR program under Draft 2.

Therefore, as an industry leader in side-hinged exterior doors (swinging), Masonite respectfully requests that the ENERGY STAR 7.0 Residential Windows, Doors and Skylights Specification reflect the conclusions previously drawn by the EPA and set the swinging door criteria for >1/2-lite doors at the nationwide U-factor of 0.28 from Draft 1, even if that requires sliding doors and swinging doors to have separate criteria.

If you have any questions or would like to discuss this further, please contact me at the e-mail address below. Thank you for your consideration in this matter.

Regards,



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