



To: windows@energystar.gov

From: Isaac Smith, President, MBPA

RE: Comments related to ENERGY STAR Residential Window, Door and Skylight Version 7.0

Date: 8/20/21

Minnesota Building Performance Association (MBPA) respectfully submits the following comments related to ENERGY STAR Residential Window, Door and Skylight Version 7.0.

MBPA is a member organization that consists of energy auditors, insulation and HVAC contractors, architects, home energy raters, and Minnesota utilities. MBPA strongly supports the proposed specification update outlined in version 7.0. We believe that this update is needed, and will help to -

- **Lower the price** for energy efficient windows
- **Increase the availability** of efficient windows, especially from American manufacturers
- **Give builders more flexibility** to achieve efficient building standards like Zero Energy Ready and ENERGY STAR homes
- **Increase available rebate opportunities** for builders and utilities
- **Improve home comfort and resilience** while limiting cold weather condensation

ENERGY STAR windows currently account for 89% of the residential window market share in the northern zone. ENERGY STAR has become the market norm and the label no longer represents the highest performing windows. An update is needed so high-performance window products can achieve market differentiation through the ENERGY STAR label. We believe that this specification update will drive market demand for high-performance windows (U-value: 0.22), which will lead to an increased supply and lower price for these products. We believe that better performing windows at more affordable prices are needed to improve the performance of our buildings.

Sincerely,

A handwritten signature in cursive script that reads "Isaac V. Smith".

Isaac Smith, President

MBPA