



March 13, 2015

Doug Anderson
Program Manager, ENERGY STAR for Windows, Doors, and Skylights
U.S. Environmental Protection Agency
Via email: Anderson.Doug@epa.gov

Re: Future specification revisions

Dear Doug,

Thanks again for conducting the December public meeting to discuss the future of ENERGY STAR for Windows, Doors, and Skylights. Your consultative approach and the thorough coverage of important issues for discussion was excellent, and I trust it will form a sound basis for any future revisions.

Among the many issues that you're considering and that we discussed at the meeting, the one that strikes me as perhaps the key challenge is developing adequate information on the cost of higher efficiency window technologies. Much of the policy analysis, e.g., whether it is time to sunset certain products, or introduce new ones, is downstream of this information, and hence depends heavily on it.

Getting the trust and buy-in of leading manufacturers and emerging technology developers to supply useful cost and performance data is of course important, and your consultative approach seems well-suited for encouraging such information sharing. I hope you find this to be the case.

Two other information sources seem worth considering. First is performing component analysis in a rigorous and transparent fashion, an approach you touched on in the public meeting. I believe there is great merit in this approach. The experience with U.S. Department of Energy rulemaking process for appliance and equipment energy standards has been typically strong and positive, and often relies heavily on component analysis. Drawing more heavily on that approach and experience seems worth considering. The results of such component analysis aren't the final word by any means, but form a strong foundation for informed discussion with stakeholders and enhancement of the analysis.

Second, given the relatively large direct and indirect purchasing role of some federal agencies, it may be worth exploring opportunities to access some of their price and performance experience. This could include seeking information not only from the agencies that procure windows for their own facilities, but also from agency programs such as the DOE Weatherization Assistance Program, and for HUD-supported purchasing of windows used in public and assisted housing.

Finally, I note that you queried whether EPA should consider sunsetting the ENERGY STAR specifications for any window, door or skylight categories. This is a healthy question and worth asking; particularly if market saturation is high and stagnant, and no new higher performance products are on the horizon. However, a range of new technologies is emerging, and there remains a sizeable fraction of consumer purchasing that doesn't take advantage of existing higher efficiency products. I hope and trust that your current effort helps draw much of that forward to the benefit of consumers and environment, and that sunsetting won't prove worthwhile for some time to come.

I look forward to the participating as EPA formulates its view and approach for the future of ENERGY STAR for Windows, Doors, and Skylights, and thank you again for your sensible approach.

Respectfully submitted,

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