

U.S. EPA  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

RE: Version 7.0 of the ENERGY STAR® Residential Window, Door, and Skylight Draft 2 Specification

Thank you for allowing Nicor Gas the opportunity to comment on Version 7.0 of the ENERGY STAR Residential Window, Door, and Skylight Draft 2 Specification released on February 14, 2022.

For six decades, Nicor Gas has been serving Illinois customers with clean, safe, reliable and affordable natural gas. As Illinois' largest natural gas distributor, and owner and operator of one of the largest natural gas reservoir storage systems in North America, we deliver the comfort and convenience of natural gas to 2.2 million residential, public sector and business customers in more than 650 communities throughout northern Illinois. The Nicor Gas Energy Efficiency Program has offerings designed to improve efficiency of gas-consuming equipment and change customer usage behaviors, keeping bills low and decreasing overall energy use. Nicor Gas also participates in regional and national market transformation initiatives to advance emerging energy-efficient technologies, including one focused on advanced high-efficiency windows.

### **Overview**

Nicor Gas is very interested in ways to improve customer comfort and bolster the efficiency of homes in our Northern climate zone, which experiences both very cold winters and very hot summers. Although windows represent only 7% of a home's envelope area, windows make up about 50% of the envelope load for heating in a new IECC code-compliant home. A tight thermal shell is fundamental to improving the energy efficiency of a residential home in our Northern climate zone, benefiting our customers by both lowering energy bills and improving customer comfort.

Nicor Gas is working on a market transformation program focused on accelerating adoption of advanced high-efficiency windows in Illinois and establishing high-performance specifications for windows. The establishment of these high-performance revised specifications for windows will help drive demand and address some of the barriers to high-R (low-U) window adoption. Barriers include limited availability, lack of awareness, cost premium, lack of competition, and low motivation to sell higher performance window products. Illinois is focused on exploring advanced windows, as well as other envelope measures, to drive deeper and longer lasting energy savings for our customers, improve resiliency, lower customer energy bills, and provide a more comfortable living environment. Improving the thermal performance of windows

will also support greater resiliency during power outages or extreme weather events, which can help make ENERGY STAR a relevant factor in resiliency and equity discussions.

Beyond market transformation, Nicor Gas is exploring a focused new construction effort targeting high-efficiency windows, as well as dedicated window offerings in the market rate rebate programs. The development of the highest performing windows, thin triple pane windows and quad-pane windows, offer a viable energy-saving measure for inclusion into our future residential programs for our climate region, and an ENERGY STAR specification will provide clarity and direction to supply chain actors to bring this product to the mass market.

### Summary

Thank you again for the opportunity to submit comments on this draft specification. To recap, Nicor Gas submits the following comment for the Draft 1 specification:

- EPA should proceed with the revised levels proposed now as this sets the stage for further technical improvements that allow ENERGY STAR to be a relevant brand for windows well into the future, offering customers options to improve their home's envelope in a Northern climate zone.
- Nicor Gas is eager for the new specification and counting on it going into effect in 2023, as this new specification will support the development and implementation of energy efficiency and market transformation programs in our service territory targeting high performance windows for single-family, multifamily, and small commercial customers both for retrofit and new construction programs. Improving the ENERGY STAR specification should drive demand and lower cost allowing us to provide incentives for these products and achieve more energy savings in our territory.

Please contact Randy Opdyke ([rwopdyke@southernco.com](mailto:rwopdyke@southernco.com)) with questions about our comments and suggestions.

Sincerely,



Jim Jerozal  
Director of Energy Efficiency Strategy  
Nicor Gas

