



*Développeur de succès  
Reach further*

August 19, 2021

Mr. Doug Anderson  
US EPA ENERGY STAR Program Manager  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW Washington, DC 20460-0001

Subject: ENERGY STAR® Windows, Doors, and Skylights Version 7.0 Specification Discussion Guide

Dear Mr. Anderson:

PH Tech appreciates the opportunity to comment on EPA's ENERGY STAR Version 7.0 Residential Window, Door, and Skylight Draft 1 Specification.

We are a designer and extruder of vinyl profiles for patio doors and windows, serving Canada and the USA.

Our comments of version 7 are related to patio doors.

We do not support aligning the sliding door criteria to the window criteria for the following reasons.

- 1) Separating sliding doors from swinging doors may lead the consumer to choose a less performing swing door product that is Energy star compliant vs a better performing sliding door product that is not ES compliant. The swing doors and sliding doors go into the same openings in a house and we believe separating the criteria will mislead the consumer and lead to confusion about performance.

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- 2) Doors are much bigger than typical windows and need steel reinforcements to meet wind load criteria. This makes it harder to meet the same numbers that are asked of windows. They simply are not the same.
  
- 3) As discussed in the proposal, in order to meet the Northern zone criteria, most if not all of the sliding door products will have to be triple glazed. Given the size of door panels, triple glazing, because of the weight, makes the doors harder to operate. A patio door gets used a lot more in its life than a typical window, so the ease of operation is very important. Moving to triples may lead to reduced customer satisfaction. The doors are also used by younger children and elderly who really don't need the extra weight of triple glass. In order to improve the ease of operation, significantly more expensive hardware is required which the average consumer will not be able to pay for. The other alternative is to somewhat reduce weatherstripping in order to minimize friction but that would result in higher air infiltration, which is definitely something that is detrimental to energy efficiency and comfort.
  
- 4) Triples in door panels will also create more health and safety issues both in the plants and in the field because of the weight of the products. A typical triple glazed door panel will weigh about 200lbs. This should be considered as these items are not easy to handle to begin with.
  
- 5) There is also a supply concern in moving to more triple glazed products as the capacity to supply triple glass in high quantities is not really available. The industry is currently struggling to supply dual glazed units in sufficient quantities. This must be taken into serious consideration.
  
- 6) In a typical house, there is one door for every 9 to 12 windows. Leaving the sliding doors with the swing door proposed criteria would still lead to improved energy savings but would allow the ease of operation and affordability of the door to remain optimal. The enhanced window performance, which is more stringent, would contribute to the overall average house performance.

Therefore, in view of all of these reasons, we strongly believe that sliding doors should remain in the door category. We believe that the proposed criteria for the door category is attainable and cost effective.

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We thank you for the opportunity to participate in the development of the criteria and remain available if you have any questions.

Best regards,

Caroline Dallaire  
President  
PH Tech inc.