

August 10, 2022

Douglas W. Anderson

Product Manager for Windows, Doors, and Skylights ENERGY STAR® Labeled Products

Re: Comments on Proposed ENERGY STAR V7 Final Draft Specification

Dear Mr. Anderson:

The Partnership for Advance Windows (PAWS) Ratings, Codes & Certifications Working Group submits the following comments on behalf of PAWS in response to the ENERGY STAR Version 7.0 Window, Door, and Skylight (WDS) Final Draft specification.

Most windows in existing buildings and in new construction, including ENERGY STAR v6 qualified products, are poor energy performers and are typically the weakest link in the building envelope. As the U.S. prioritizes net zero energy buildings, addresses carbon emissions, and confronts the challenges of decarbonizing the grid, there is a pressing need to dramatically increase the availability, reduce cost, and increase use of highly efficient window products, in both existing and new buildings. With the release of ENERGY STAR v7, the EPA has an opportunity to not only enhance cost effective energy savings for building owners but also to position itself to more effectively transform the window market to meet the nation's critical 2030 energy and carbon goals.

We appreciate EPA taking the time and resources to respond to v7 Draft 1 and Draft 2 comments. As we stated in our comments to Draft 2, the performance levels proposed in the specification represent significant progress in window energy efficiency in all climate zones, while providing sensible energy cost paybacks to consumers. The changes in the South, South Central and North Central are all using technology that is widely available in other v6 zones now. The revision in U-factor to ≤ 0.25 for the North Central zone in the final draft will allow for an even greater percentage of product lines that are already NFRC certified to meet the specification now. The requirements in the North zone will require more changes but you have amply demonstrated that these levels are achievable based on current NFRC Certified Product Database (CPD) data. Furthermore, PAWS intends to assist both supply and demand side partners who need help in making this transition to a new product mix in the North. It has been a long wait for this important step in colder climates and we are very excited for both the window and the door proposed specifications.

The NFRC CPD data suggests that the performance ranges proposed in all zones are feasible, practical, and widely certified in the most common window operator types. PAWS plans to work with utilities who we expect will offer short term incentives to help the market transition perhaps even in advance of the formal EPA program start date and PAWS commits to working with other supply and demand side partners to help promote a timely and successful launch in 2023. We also look forward to the ongoing assessment of the ENERGY STAR Windows, Doors, and Skylights program, highlighting new cost-effective performance levels for window, door, and skylights as the market adjusts to the v7 specification.

Sincerely,

The Partnership for Advanced Window Solutions (PAWS):

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