



March 13, 2015

Mr. Doug Anderson
Program Manager, ENERGY STAR® for Windows, Doors, and Skylights
US Environmental Protection Agency (6202J)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Mr. Brian Booher
D&R International, Ltd.
1300 Spring Street, Suite 500
Silver Spring, Maryland 20910

Dear Mr. Anderson and Mr. Booher:

Pella Corporation greatly appreciates your sponsoring the ENERGY STAR® Windows, Doors, and Skylights Stakeholders Meeting on December 12, 2014. Maintaining an open and robust dialogue is vital to the continued success of the program, and this meeting was an excellent beginning to the development of the next specification revision. As follow-up to that meeting, we respectfully submit the following comments for your consideration:

- 1) As was discussed during the Stakeholders Meeting, Pella appreciates that EPA is soliciting industry for more meaningful product sales data. Striking a balance between providing usable data and maintaining confidentiality is challenging. We are willing to continue pursuing solutions that satisfy both EPA and industry. It may be worthwhile to note that for Pella, low-e glazing makes up 96% of our overall sales, triple glazing represents less than 1% of overall sales, and we have removed clear glazing from the vast majority of our product offering. Based on that, EPA may wish to consider only dual-glazed low-e products as representing substantial sales volumes.
- 2) One of the stated Guiding Principles of the program is "Significant energy savings can be realized on a national basis". Pella strongly supports this guiding principle, and contends that it should be the fundamental, over-arching goal of the program. Pella further contends that for fenestration, the best way to achieve this goal is to promote the replacement of poor performing (e.g. single-pane and clear dual-pane) glazing in existing buildings.

It is estimated that there are approximately 1 billion single-pane windows/doors in today's existing building stock. Replacement of these products with existing and affordable technologies will yield substantial energy savings on a national level, and will also help create jobs to bolster an economy that continues to struggle.

- 3) While appropriate specification revisions are necessary for success of the program, such revisions present burdens to industry. In addition to driving product design enhancements, each revision also drives a need for inventory rotation, communication and education, documentation/literature updates, product display updates, product labeling updates, etc. In many cases, these administrative burdens are greater than the technical/design burdens.

A specific example is the two-stage implementation of the V6.0 criteria for windows in the Northern Zone. Pella understands there were several influences that drove EPA to employ this two-stage approach. However we are finding it to be cumbersome to implement, and confusing to our customers.

For this reason Pella encourages EPA to reduce the frequency of specification revisions and allow industry more time recoup the associated costs. Pella suggests that EPA establish a set 5-year revision cycle, with 3 years for criteria development and 2 years for implementation.

- 4) Pella encourages EPA to coordinate with NRCAN to further harmonize the US and Canadian programs, with respect to both revision cycles and climate zones.

As you know, V6.0 was implemented on January 1, 2015. Just one month later, NRCAN implemented the 2015 version of the Canadian program. Future alignment of revision and implementation schedules between the two programs would be beneficial to everyone involved.

We also believe there may be an opportunity to consolidate climate zones between our two countries. For example, Canada's Zone 1 is relatively small compared to all other climate zones. Perhaps Zone 1 in Canada and the Northern Zone in the US could be combined into a single zone.

- 5) Similar to item #4, and in the interest of further simplification, Pella encourages EPA to consider reducing the overall number of zones. For example, perhaps the current Southern and South-Central zones could be combined into a single zone.
- 6) As revised criteria is developed, Pella encourages EPA to consider separate U-factor criteria for two product categories:
 - Impact-resistant products
 - High-altitude products

The design and nature of these products represent unique challenges in meeting the U-factor criteria, particularly in the Northern Zone. Pella contends that these challenges are substantial enough to warrant separate criteria.

- 7) Pella understands that EPA supports recognition of dynamic products in the ENERGY STAR® Program, but only if the products are automated so as not to be dependent on occupant intervention. Pella supports this and encourages EPA to maintain this position. Only through automated control can such products provide optimal energy efficiency.

Thank you for your time and consideration. We welcome the opportunity to review these points with you in more detail at your convenience.

Pella Corporation Contacts:

Kevin Gaul
Manager - External Affairs and Design Assurance
641-621-3933
GaulKJ@Pella.com

Joe Hayden
Senior Engineer - Technical Leader
641-621-6096
JAHayden@Pella.com