



August 10, 2022

Mr. Doug Anderson
Program Manager, ENERGY STAR® for Windows, Doors, and Skylights
U.S. Environmental Protection Agency (EPA)

Re: ENERGY STAR Residential Windows, Doors and Skylights Version 7.0 Final Draft Specification

Pella Corporation appreciates this opportunity to review and comment on the Version 7.0 Final Draft Specification. We offer the following for consideration.

Version 7.0 Effective Date

Pella understands that EPA plans for an effective date of 1 year after criteria finalization. Based on the latest schedule, the criteria will likely be finalized in September 2022, and would therefore become effective in September 2023. We reassert our request that EPA set an effective date of January 1, 2024. In addition to our previous comments, we believe transitioning in the middle of a calendar year may be confusing to tax payers applying for federal tax credits. EPA should consider how a mid-year transition will align with IRS tax codes. We maintain that it is simply rational, intuitive and cleaner to make the transition at the beginning of a calendar year.

U-factor requirement for Windows in the North-Central Zone

Pella appreciates EPA's decision to change the U-factor requirement from 0.24 to 0.25 for windows in the North-Central Zone. However, we encourage EPA to consider further increasing this to 0.26. We note that a requirement of 0.25 in the North-Central Zone is slightly more stringent than the U=0.26 equivalency option in the Northern Zone. It may be confusing for homeowners to understand that a window with a U=0.26 can qualify in the Northern Zone but cannot qualify in the North-Central Zone. Increasing the requirement to 0.26 in the North-Central Zone would avoid this potential source of confusion.

U-factor requirement for > ½-Lite Doors in the South-Central and Southern Zones

Pella appreciates EPA's decision to change the U-factor requirement from 0.25 to 0.28 for > ½-Lite doors in the two southern zones. However, if EPA changes the U-factor requirement for windows in the North-Central Zone to 0.26 as suggested above, we recommend EPA also consider increasing the U-factor requirement for > ½-Lite doors in the two northern zones from 0.25 to 0.26 for consistency.

Increased Marketing and Promotion of ENERGY STAR

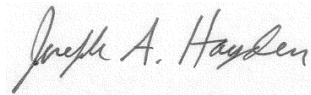
Pella reiterates our request that, as part of increased marketing and promotion efforts, EPA reassert the message that ENERGY STAR is a voluntary program that is intended to be aspirational and “above-code”, and is not intended to be adopted into energy codes. While we understand that EPA has no **direct** authority over energy code decisions, EPA must acknowledge their substantial **indirect** influence over such decisions. EPA’s reassertion of this fundamental message is appropriate.

Proposed Equivalent Energy Performance Paths for Windows in the Northern Zone

Pella remains concerned that EPA has not fully considered all aspects of this proposal. To reiterate, our experience is that the use of high solar gain products in cold climates often results in issues with occupant discomfort, condensation, and higher than expected energy bills. Typical homeowners do not understand that the fenestration is only one of many aspects to consider for an effective passive solar design. We maintain our recommendation for further limitations, or elimination of the equivalency options all together.

Once again, Pella Corporation thanks EPA for the opportunity to comment on the final draft. We continue to be an advocate for the ENERGY STAR Program and support EPA’s objective of reducing energy consumption. Please don’t hesitate to contact me if you have questions or would like to discuss anything further.

Sincerely,



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