



August 21, 2023

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

Re: ENERGY STAR Most Efficient 2024 Proposed Criteria for Residential Windows and Sliding Glass Doors

Pella Corporation appreciates this opportunity to review and comment on the proposed Most Efficient 2024 criteria. We offer the following for consideration.

U-factor and SHGC requirements for the South-Central and Southern Zones

Pella understands that EPA's rationale for revising the criteria in the two southern zones is to expand the number of products that will qualify. Pella's position is that the proposed revision will not significantly affect the number of qualifying products, and that triple-pane glazing will still largely be required to meet the new criteria. While there are some dual-pane products in the NFRC CPD that can qualify, these products typically utilize foam filled frames, super-spacers, and room-side low-e coatings. They represent a small percentage of dual-pane products and are the most costly of such products. If EPA truly desires to allow more dual-pane to qualify, a U-factor of no less than 0.25 is recommended for both the South-Central and Southern Zones.

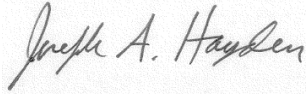
Similarly, an SHGC of 0.21 or less will likely require tinted glass in a dual-pane construction. Our experience is that tinted glass is typically not well received in residential applications and many consumers are likely to object. We recommend an SHGC of no less than 0.23 for both the South-Central and Southern Zones.

Removal of NAFS PG Requirement

Pella opposes removal of the PG minimum requirement. Meeting the PG-15 performance requirements is not overly burdensome and will provide assurance to consumers that the product has at least a minimum level of safety, durability and integrity. We understand that PG requirements are specified in building codes, However, in our experience, building code adoption and enforcement is inconsistent throughout the US, and is very limited in replacement applications. Pella recommends retaining this requirement.

Once again, Pella Corporation thanks EPA for the opportunity to comment on the proposed criteria. 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,

A handwritten signature in black ink that reads "Joseph A. Hayden". The signature is written in a cursive style and is positioned above a light gray rectangular background.

Joseph A. Hayden
Principal Engineer
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