



Pilkington North America, Inc.

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Doug Anderson, Energy Star Program Manager – Residential Branch

United States Environmental Protection Agency (“EPA”)

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Re: Comments Supporting the Adoption of EStar’s Criteria V7.0

Dear Doug:

NSG Group/Pilkington North America, Inc. (“PNA”), is pleased to provide its comments in response to the Energy Star’s (“EStar”) Residential Window, Door, and Skylight Draft 1 Specification published on July 7, 2021 (“V7.0 Criteria”). PNA has consistently participated in the development of EStar criteria and appreciates this opportunity to provide the following comments.

Although the V7.0 Criteria takes a significant step forward in stringency compared to V6.0, that step forward is clearly justified by EPA’s extensive analysis of available technologies, product availability and cost effectiveness throughout all U.S. climate zones.

Before EStar recognized the equivalency of energy performance through the adoption of U-factor/SHGC trade-offs in the northern zone, homeowners in the north were largely deprived of the opportunity to select high solar gain EStar labeled windows. This unwittingly compelled them to use larger amounts of fossil fuels to heat their homes, simply, because their low SHGC windows deprived them of the sun’s free energy. This resulted from the fact that earlier versions of EStar matched northern U-factor criteria with “any” corresponding SHGC, even the low SHGCs products used in the south. This, in turn, led to a “one size fits all” national window marketing strategy where the same ultra-low SHGC windows designed for the south were allowed to bear an EStar label, not only in the south, but ***in all other climate zones, including the north***. This unfortunate matching was even carried forward into EStar V6.0, where a 0.27 U-factor was matched with “any” SHGC in the northern zone.

PNA applauds EPA’s decision in EStar V7.0 to finally eliminate the use of “any” SHGC as a match for U-factor criteria in the northern zone. Although it will likely draw opposition from those that will inevitably mourn the loss of the “one size fits all” nationwide window marketing strategy, the inclusion of multiple U-factor/SHGC trade-offs in the northern zone will exponentially expand the technologies and products capable of securing an EStar label in the north through the delivery of equivalent energy performing windows. More importantly, it will expand the opportunity for northern zone homeowners to reduce their costly reliance on fossil fuels in favor of using higher SHGC windows capable of accessing the sun’s free energy.

In short, PNA fully supports the adoption of EStar’s V7.0 Criteria.

Very truly yours,

NSG Group/Pilkington North America, Inc.

cc: Brian Booher, D&R International, Ltd. bbooher@drintl.com