



August 10, 2022

Mr. Doug Anderson
Program Manager, ENERGY STAR® for Windows, Doors, and Skylights
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW Washington, DC 20460-0001

Subject: ENERGY STAR® Version 7.0 Residential Window, Door, and Skylight Final Draft Specification.

Dear Mr. Anderson,

ProVia has been a very active and long supporter of the Energy Star® program for Windows, Doors and Skylights and we appreciate the opportunity to review and comment on the Final Draft of Version 7.0 for Energy Star Residential Windows, Doors, and Skylights specification. ProVia will remain actively involved and is very interested in the continued success of the Energy Star® program.

ProVia has reviewed the Final Draft Specifications as well as the Draft 2 comment responses the EPA has provided. Even though there have been some unresolved comments from Draft 2, ProVia would like to make some additional changes to the unresolved comments that we believe could enhance Version 7 prior to making the specifications final.

The concerns that ProVia would like to be considered prior to the release of the finalized version:

- Changes to the Equivalent Energy Performance in windows still has a lower performing ENERGY STAR® requirement in the Northern Zone than the North-Central Zone.
- The U-Factor limit for > ½-lite doors remains too low in the Northern and North Central climate zones which is problematic and not cost justified.
- The Version 7.0 implementation date would be more appropriate if it would be moved to the beginning of a calendar year, (January 1, 2024).
- The proposed window changes were not significant enough and will still force most windows to use Triple Pane glass, Krypton filled IG and other costly technologies that will have a very long and undesirable payback period for the end consumer.
 - Along those same lines, we feel that the addition of these materials has not been properly accounted for from a supply chain perspective. Suppliers to our industry are constrained in production outputs (flat glass to name one) and the supplier's ability to ship these materials in a timely manner is in a less than desirable position.
- The subtle changes in the Final Draft Criteria places an unfair burden on manufacturers that supply the Northern Zone.

ProVia stands behind the changes that were made in the Final Draft, but these changes weren't significant enough to make a difference and we feel that some requirements are still too stringent and need to change further.

Window Equivalency criteria for windows in the North, North-Central Zones:

ProVia appreciates that EPA has revised the criteria for the Equivalent Energy Performance Paths in the Northern Zone. However, ProVia is still concerned that EPA has not fully considered all aspects of this proposal. In the final Draft, it is still possible to have a window in the Northern Climate Zone to have a worse U-factor (0.26) and the same SHGC (0.40) than the North-Central Zone with a better performing U-Factor (0.25) with the same SHGC (0.40) and meet the proposed ENERGY STAR requirements in the colder climate zone. With the EPA set on maintaining the alternate equivalency values in the Northern Zone, it seems logical to modify the North-Central requirements from the proposed 0.25 to a 0.26 U-factor. This would at least match the last Equivalency Energy Performance path in the Northern Zone. This will still be an improvement from previous draft proposals without the inconsistency of having poorer performing windows in the Northern Zone as compared to the North Central Zone. This would also eliminate any confusion and explanations to consumers.

Adjusting the U-factor requirement for > ½ lite doors:

ProVia appreciates the consideration that the EPA has set forth by adding the regional requirements for the South, South-Central Zones of a U factor of ≤ 0.28 for all > ½- lite doors. ProVia would like the EPA to consider setting the U Factor requirements for the North, North-Central Zones to a ≤ 0.26 rather than the ≤ 0.25 the final draft currently specifies. This will allow many highly energy efficient sliding patio doors to maintain compliancy with the Version 7 specifications.

Implementation Date:

ProVia recommends that EPA set an effective date of January 1, 2024, for the Version 7.0 for several reasons:

- It was stated in the Draft 1 specification that "EPA recognizes stakeholder interest in a specification transition at the end or beginning of a calendar year and will aim to accommodate this". ProVia encourages EPA to honor this intent and set an effective date of January 1, 2024.
- Implementing a requirement revision in the busy period of our industry will be disruptive for the industry as well as the consumer for Energy Tax Credits.
- This is also important to the manufacturers, allowing them time to make necessary changes in product design, testing, certification, manufacturing, as well as time for necessary marketing promotions and other operational changes that need to be made with a new version.
- ProVia also feels that the addition of any potential materials to meet the new requirements has not been properly accounted for from a supply chain perspective. The suppliers to our industry are constrained in production outputs so their ability to ship these materials in a timely manner will be a challenge as manufacturers recover from supply shortages currently.

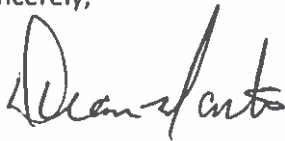
Summary and Recommendations

In your review of our comments, we recommend EPA consider and implement the following changes prior to finalizing ENERGY STAR Version 7.0 Specifications:

- Adjust the U-Factor in the North, North Central Zones for > 1/2-Lite doors from ≤ 0.25 to ≤ 0.26
- Adjust the window U-Factor in the North-Central Climate Zone from 0.25 to 0.26
- Set the implementation date for ENERGY STAR Version 7.0 to January 1, 2024

ProVia is grateful and privileged to have this opportunity to provide added comments on EPA's Energy Star® Version 7.0 Final Draft Specifications. Please don't hesitate to contact me if you have any questions or would like to discuss anything in more detail.

Sincerely,



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