

From: Ray Garries <raygarries@gmail.com>
Sent: Friday, August 20, 2021 4:32 PM
To: Anderson, Doug <Anderson.Doug@epa.gov>
Subject: Energy star

Doug Andersen
EPA Director

Doug,

This note is to address concerns with the proposal to require Energy Star program changes to windows, doors, and skylights. We would like to thank you for the extensive work and analysis your team and DOE put into this proposal. The reports are the most extensive we have seen.

As you know I have been heavily involved with Energy star development since the start of the program in 1998 and have been part of NFRC since 1991. Given this experience and concern for the consumers of our products I write these concerns;

- Consumer acceptance by willingness to pay a premium is key to the program's success. We must be most concerned about the clear point of this proposal's key component basis of a \$3.59 energy savings per month over existing energy star products. This low savings number along with the \$1265-\$2760 projected increase in window price (whole house of 23 windows) reveals a poor deal for the consumer. They must be willing to buy Energy Star products!
- The proposal requires a triple pane for most every window in the North. This drives carbon content of windows up by %50 and is in strong conflict with EPA's carbon reduction program. Triple panes also drive the weight of a standard window up by nearly 45 pounds each. This will cause more carbon embodiment and safety concerns for installers
- EPA is proposing a 23% increase in performance, which is dramatically higher than other Energy star categories under revision. This disadvantages the window door and skylight industry.
- The proposal's triple pane quest also puts strain on the durability of IG products. The current low volume of triples has not given the industry enough experience with high volume sealant application, pressing and curing. The manufacturing of triples is three times more difficult with standard processes

The recommended remedy is to modify the proposal to keep double panes in all regions and to limit U values to .24 and not the .22 proposed. This reconsideration is critical to keeping the consumer engaged with the program and thus keeping large retailers and distributors engaged.

Thank you for the consideration and feel free to contact me for more info.

Ray Garries

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