

From: Ray Garries <raygarries@gmail.com>
Sent: Wednesday, August 10, 2022 11:12 PM
To: Anderson, Doug <Anderson.Doug@epa.gov>
Subject: Energy Star V7 response and request for modification

August 9 2022

To; Mr. Doug Andersen, EPA manager for Energy Star Windows and Doors,

We write to request changes to the latest version of the proposed Energy Star program. This program is one of the most important and most used government/industry partnerships in existence. Our concerns come from our desire to have continued success with this program. In other efficiency programs the rules and criteria are simply mandated and must be followed by law. Energy Star allows the needs of the industry to have strong input into the final standard. This is why we must diligently compromise and consider each other's concerns.

First, let me thank you for your multiple replies to our questions. We are pleased that some of our minor program suggestions were accepted and continue to be concerned that many larger modifications were not.

We realize that at this time it is unlikely that you will accept large changes to the program but we must continue to work together to improve the program. There is still time to change! Our core requested changes are

1. A realistic start date
2. Adjustments to Solar Gain criteria
3. Commitment to voluntary status
4. Realign U values between zones
5. Realization that Safety is required
6. Use of Sustainable carbon principals
7. Criteria that reflects climate change
8. Recalculation with recent new data
9. Fairness principles in testing

The details of each of the 9 points follows:

1. The window and door industry is going through one of the more difficult times in our history. Supply chains have broken, Inflation is raging, and demand is unstable. Even with the massive 100% increase in some energy sources cited in your report, the paybacks are extended and not decreased with these headwinds of manufacturing. With these payback concerns and the huge investment that must be made to products and machinery, the program adjustments must not start until December 2024. Anything sooner will cause decision makers to reconsider the importance of Energy Star programs.
2. Your reply to our last request to have minor tweaks to the SHGC levels in the trade off categories notes that any decrease in savings is not acceptable. This is

true if the analysis is complete and site cost based. The new analysis provided shows only a \$5.00 per year decrease in savings per home but is based on source energy. This distorts this minor decrease and leads to the decision to not change the SHGC. We advocate for a re-analysis and advocate for the tradeoff changes of;

- .23U and greater/equal to .27 SHGC
 - .24U and greater/equal to .27 SHGC
 - .25U and greater/equal to .30 SHGC
 - .26U and greater/equal to .30 SHGC
3. The Energy Star program must remain above code and not be just a stepstone to the next energy code. We request EPA work with the code groups to discourage the escalation game that drives up cost without commensurate energy savings.
 4. . The North central zone U value should change to a .26 u to align with the Northern tradeoff zones. This change will lessen confusion for consumers who simply look at U values
 5. Consumer safety must be a core requirement of any agency program. Only a NAFS certification requirement in Energy star will offer glazing and durability safety consumers deserve. NAFS must be part of not only Energy Star Most Efficient , but also the V7 program!
 6. EPA continues to deny that the embodied energy content be considered in the program. This continues to be in conflict with many agency and administrative programs now in place. Epa must reconsider this exclusion and add this factor to all programs
 7. Even though there may be disagreement on the level of cause, climate change is real. The EPA should adjust for this reality by moving the IECC zone 5 into the North central zone. Most agree this is more suited for the existing conditions in this area.
 8. EPA must recognize that one of the major spacers used to make insulating glass has been downgraded. This high volume product is used in millions of windows annually and surely is reflected in the analysis EPA used for penetration and for ease of compliance. Given this situation, EPA must recalculate the effects of this spacer use in all its analysis asap. V7 should not proceed until this evaluation is complete and presented to our industry partners
 9. In our last letter, we asked that EPA eliminate the punitive "one Strike" rule and allow additional testing in case of a single test failure. We restate the importance of this revision and ask that EPA reconsider. One physical test abnormality must not cause a potential delisting and revocation of Energy Star certification. We stand willing to work with the EPA to revise the system.

Lastly, we reiterate that this program must be the model for other industry/agency relationships. We respect and appreciate the goals of Energy Star and strive to make the program as good as it can be. Please accept our recommendations and we look forward to any questions or concerns you may have with these points

Thank you!

Ray Garries