



August 19, 2021

TO: US Environmental Protection Agency / NFRC
Douglas W. Anderson, Product Manager for Windows, Doors, and Skylights
ENERGY STAR Labeled Products

FROM: SoftLite Windows & Doors

RE: Proposed Changes for ENERGY STAR Version 7.0 Draft #1

Thank you for the opportunity to comment on the proposed changes for ENERGY STAR 7.0. As an ENERGY STAR Partner and manufacturer of premium vinyl windows and doors, we have the following concerns regarding the proposed changes.

- 1.) The proposed .22 U-value for the Northern Energy Zone is too significant of a change and will negatively impact sales on ENERGY STAR qualified products.
- 2.) The proposed changes will force most all windows and doors to have triple pane glass options. While these are viable options today, the payback period of 11 years is too long.
- 3.) The fenestration industry is already facing severe production outages on flat glass. The added demand for triple pane glass options will further stress the supply chain and will also negatively impact sales of ENERGY STAR-rated products.
- 4.) Many products currently meeting the .22 U-value are no longer using Krypton gas. Krypton gas is extremely limited and is currently priced out of the market. The fenestration industry cannot (and should not) consider products with Krypton as viable options for future ENERGY STAR product ratings. It is our understanding that EPA used the current CPD listing to do their analysis. We strongly recommend removing product with Krypton for any analysis done that got us to this point.
- 5.) The proposed 7.0 Qualification Criteria places an unfair burden on manufacturers that supply the Northern Zone.
- 6.) Sliding Patio doors should remain as part of the door requirements and not be included in the residential windows program. These products do not get the same U-values as typical residential windows with the same glass options and will not meet the .22 requirements.
- 7.) The adoption timetable for manufacturers is too short. More time is needed to allow for reconfiguration of products and testing.

Please consider the following comments and recommendations:

1. Scale back the proposed Northern Zone qualification criteria to be no less than a U-Factor of 0.25.

2. Provide a longer adoption timetable so that manufacturers and suppliers can make the appropriate design changes and capital investments that will still be required to achieve U=0.25.
3. Use a more realistic method to determine product and market availability of ENERGY STAR-rated product as opposed to using the NFRC CPD.
4. Limit criteria changes to allow the use of technologies that can be adopted at a reasonable cost increase that will encourage the use of ENERGY STAR-rated windows and doors.

Thank you for the opportunity to respond regarding the proposed ENERGY STAR version 7.0 Draft #1 changes. We are passionate about promoting our ENERGY STAR-rated windows and doors and hope that you find this feedback helpful in determining the ENERGY STAR criteria that meets the objectives of the EP, the fenestration industry, and consumers that will benefit from these products.

Sincerely,

Mark Hobbs
General Manager
SoftLite Windows & Doors