

August 18, 2021

Mr. Douglas Anderson
U.S. ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460
windows@energystar.gov

RE: ENERGY STAR® Windows, Doors, and Skylights Draft 1 Version 7.0 Specification

Dear Mr. Anderson:

On behalf of an organization committed to equity, affordability, energy efficiency, and energy justice, I write to voice full support of ENERGY STAR® Draft 1 Version 7.0 specification.

Windows make up nearly 50% of the envelope load for heating in a new IECC code compliant home but represent under 10% of the envelope area. They are a vastly overlooked way to reduce energy waste and increase comfort for residents, yet the ENERGY STAR label does not currently differentiate true higher performing products.

A high-performance requirement for the ENERGY STAR specification will drive demand and address some of the barriers to high-R (low-U) window adoption (limited availability, cost premium, lack of competition or motivation to sell higher performing products, etc.). We anticipate this will result in opening access to this technology for a broader range of the American public, not just the wealthy that can currently afford triple-pane windows. EPA should proceed with the levels proposed. Not only does this set the stage for further technical improvements, it ensures that the ENERGY STAR brand will become / remain relevant for windows.

Energy notwithstanding, homes with thermally improved windows will be more comfortable. They will require smaller and less expensive HVAC equipment. And they will be far more resilient during power outages or extreme weather events such as Texas experienced this winter.

We look forward to the ENERGY STAR specification update inspiring American manufacturers to create products that are mostly only available from overseas, despite the fact that the well-researched Criteria Analysis Report shows that more than half of product lines can meet even the most stringent climate zone criteria in the draft specification -- and at reasonable incremental cost.

Every American deserves access to affordable, high performance windows. In 2021, this is not the case. This is an energy and social justice issue. The Draft 1 Version 7.0 specification update is a critical piece that will help change this narrative.

Sincerely,



Jenna Antonino DiMare
Executive Director
Vermont Green Building Network
<https://www.vtgreenbuildingnetwork.org/>