

Vitro Architectural Glass
400 Guys Run Road
Cheswick, PA 15024, USA
www.VitroGlassHub.com

Michael J Hammond
Manager, Technical Support
T: 412-820-8160
F: 412-826-2299



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Mr. Douglas W. Anderson
United States Environmental Protection Agency
ENERGY STAR for Windows, Doors and Skylights Program Manager
Office of Air and Radiation
1200 Pennsylvania Ave NW
Washington, DC 20460
Submitted via: windows@energystar.gov

Subject: Stakeholder comments from Vitro Architectural Glass on ENERGY STAR® Windows, Doors, Skylights Version 7.0 Specification Discussion Guide.

Dear Doug,

Vitro Architectural Glass wishes to thank you for the opportunity to provide input to the proposed improvements to the ENERGY STAR for Windows, Doors, and Skylights Program. As you may know, Vitro has long supported the development of energy conservation programs promoting the use of energy efficient glass and window products. Vitro recognizes and appreciates the EPA's efforts to shape the requirements for this important ENERGY STAR product category. We appreciate that the EPA will continue to monitor the proceedings and updates to the 2021 IECC and will take these code proposals into consideration in evaluating a potential specification revision.

The following comments on the ENERGY STAR for Windows, Doors and Skylights Version 7.0 Product Specification Framework Document are intended to assist in the continued development of a program which enhances energy efficiency, is good for the environment, offers consumers savings and improved comfort while enhancing product performance.

- We appreciate that the EPA has continued to follow the development of ENERGY STAR specification in Canada and agree that the EPA must evaluate a potential specification revision in the United States on its own merits separately and independently of the Canadian program.
- We support that cost-effectiveness is a key consideration for the EPA when analyzing the potential revised specification and that customers should be able to recover their investment within a reasonable period of time, that does not exceed the life expectancy of the product.
- We feel the Energy Star specification is pretty simple as it exists today; however, we agree that the EPA should look for opportunities to further simplify the specification. In this regard, we believe that the EPA should wait for the proposed 2021 IECC code updates before making any final decision to combine the ENERGY STAR Southern and South-Central climate zones, establishing a minimum Solar Heat Gain Coefficient

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(SHGC) for the Northern Climate Zone, or consider moving IECC Zone 5 out of the ENERGY STAR Northern climate zone and into the North-Central climate zone.

- Vitro would support improving specification criteria in an effort to save energy such as reducing U-factor in Northern climate zone.
- As the specification is normally in place for many years without revision, we appreciate that the EPA is open to extending the implementation schedule to help ensure that there are products available for sale that meet any potential revised specification.

We agree with and support the proposed requirements in the Version 7.0 Specification Framework Document as they represent an opportunity to raise the bar while at the same time maintaining product features and helping to facilitate reduced energy consumption and consumer savings.

We trust that these comments will be helpful and thank you in advance for due consideration of our input in the development of the final Version 7.0 Product Specification Framework Document. As always, we look forward to continued involvement in your efforts.

Please let me know if I can be of further assistance, particularly if there are any questions on our comments concerning Version 7.0 Specification Discussion.

Sincere regards,

Michael J. Hammond

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Manager, Technical Support
Vitro Architectural Glass

