January 18, 2023
Mr. Doug Anderson
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Subject: Residential Skylights and Tubular Daylighting Devices (TDDs) for ENERGY STAR Most Efficient 2023

Dear Mr. Anderson:

The Window and Door Manufacturers Association (WDMA) appreciates the opportunity to comment on EPA's proposed criteria for ENERGY STAR® Most Efficient for Skylights and Tubular Daylighting Devices (TDDs) recognition issued on December 15th, 2022. As EPA knows, WDMA members are leading producers of residential skylights for domestic and export markets and have been committed supporters of the ENERGY STAR window, door and skylight program since its inception. Our members have contributed greatly to growing the ENERGY STAR brand in the window, door and skylight sector because of the great benefit it has been to consumers and energy savings.

WDMA and our skylight manufacturing members (Velux and Marvin) carefully reviewed the proposed recognition criteria for Residential Skylights and Tubular Daylighting Devices (TDDs) for ENERGY STAR Most Efficient 2023. We appreciate the effort EPA has made in developing the Most Efficient criteria for 2023, however, we would like EPA to reconsider the WDMA recommendations for the Most Efficient criteria in 2023 that we provided you last September:

Climate Zones	U-factor	SHGC
Northern	≤0.42	Any
North-Central	≤0.45	≤0.23
South-Central		
Southern		

As stated previously, WDMA proposed aggressive values that fell into a "most efficient" commercially available skylight category for the following reasons:

- The performance values fit in as a nice progression from the 2021 and 2024 IECC (Draft 1), and to ENERGY STAR 6.0 and 7.0 to the first ever 2023 ENERGY STAR Most Efficient for skylights/TDDs. It is important to acknowledge that Version 6.0 criteria will be in place for over 80% of the calendar year 2023.
    - The table shows an efficiency improvement that is a weighted average of housing starts of 18.4% for the ENERGY STAR 6.0 criteria in place through October 23, 2023.
    - The table also shows an efficiency improvement that is a weighted average of housing starts of 9.7% for ENERGY STAR 7.0 levels.

Efficiency Improvement for Proposed Most Efficient Criteria Compared to ENERGY STAR

Climate Zone	Percent Housing Starts	WDMA Proposed Most Efficient	ENERGY STAR Version 6.0	ENERGY STAR Version 7.0
Northern	24%	0.41	0.50	0.45
North-Central	20%	0.45	0.53	0.50
South-Central	29%	0.45	0.53	0.50
Southern	27%	0.45	0.60	0.50
Weighted Improvement			18.4%	9.7%

- The more stringent U-factors proposed by EPA, especially the Northern Climate Zone, will require redesigns that will severely limit product availability for 2023 and significantly increase the price to the consumer.
- There has been a very short turnaround time for the creation of the first-ever ENERGY STAR Most Efficient Skylight/TDD criteria. The creation of this category is because the Inflation Reduction Act (IRA) includes a 25C tax credit for skylights that did not previously exist.

In summary, WDMA's concern remains that the first-ever ENERGY STAR Most Efficient criteria should be established at a level that will allow proper market penetration for consumers using the IRA 25C Tax Credit. At EPA's proposed levels, this will force manufacturers to redesign skylight products in 2023 to incorporate triple-pane glass to meet U-factor requirements during the program's first year. The first-ever program should allow consumers to purchase more efficient skylights/TDDs.

Since the EPA's Most Efficient criteria are reviewed annually, EPA will have an opportunity to adjust the 2024 criteria, if deemed necessary. Please let me know if you have any questions or concerns regarding our proposed ENERGY STAR Most Efficient criteria for Skylights.

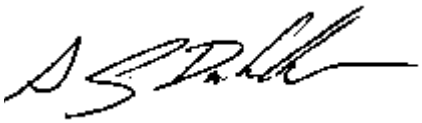
WDMA would like to make a small but significant revision to the first proposal we provided in September 2022. This change will ensure that there is adequate product availability in 2023 for consumers interested in taking advantage of the new 25C federal income tax credits for skylights while maintaining significant energy savings above the current ENERGY STAR requirements.

Revised WDMA Most Efficient Suggested Proposal

Climate Zones	U-factor	SHGC
Northern	~~≤0.42~~ ≤0.41	Any
North-Central	≤0.45	≤0.23
South-Central		
Southern		

Please let me know if you would like clarification on our comments or if there is additional information we may be able to provide as EPA moves forward with finalizing the 2023 Most Efficient criteria for Residential Skylights and Tubular Daylighting Devices.

Sincerely,



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