



**WMA Comments**  
**ENERGY STAR for Windows, Doors, and Skylights**  
**Version 7.0 Final Draft Specification**

**August 10, 2022**

WMA welcomes the opportunity to comment on ENERGY STAR Version 7.0 Residential Window, Door, and Skylight Final Draft Specification released July 19, 2022 by the U.S. Environmental Protection Agency (EPA).

WMA's comments specifically address EPA's proposed change in the final draft to adjust the U-factor criteria for all > ½-lite doors back to  $\leq 0.28$  in the South-Central and Southern zones, while keeping the U-factor requirement for > ½-lite doors in the North/North Central zones at  $\leq 0.25$  as reflected in Draft 2 of the specification. EPA's reasoning for this change is that it will allow "greater selection with only a minimal change to savings."

**Comment:**

This final adjustment for doors appears once again to be an arbitrary compromise based on EPA's rationale of allowing for "greater selection with only a minimal change to savings."

In reality, for the door industry, splitting the U-factor requirement into two separate zones in order to achieve only marginal energy savings in the North/North Central zones will create undue cost increases and production challenges for producers to maintain ENERGY STAR qualification, given current supply chain constraints. This is an unnecessary splitting of hairs. As WMA stated in its Draft 2 comment submission, the additional costs involved in producing > ½-lite doors that would meet the proposed  $\leq 0.25$  U-factor would inevitably be passed on to the consumer and would outweigh the "minimal change to savings" gained, especially during this time of supply shortages and inflationary pressures.

EPA stated in its Discussion Guide from 2019 that consumers should recover their investment in increased energy efficiency through utility bill savings within a reasonable timeframe, and that one of the ways to do that is by focusing on lowest-cost options for improving performance. The incremental energy savings gained going to a  $\leq 0.25$  from a  $\leq 0.28$  U-factor will not recover the high costs involved in adding specialty glazing options to meet the proposed  $\leq 0.25$  U-factor rating.

Furthermore, as WMA pointed out in its comments to Draft 2, U-factor requirements for > ½-lite doors is already more stringent than the proposed U-Factor criteria of  $\leq 0.32$  for windows in the Southern climate zone. If doors represent a much smaller amount of surface area of a house than

windows, and thereby have a lesser impact on household energy use than windows, as stated in EPA's Criteria Analysis report, then it's unreasonable to specify more stringency.

**Recommendation:** WMA stands by its previous recommendation that EPA go back to the  $\leq 0.28$  U-factor criterion for  $> \frac{1}{2}$ -lite doors in all climate zones as proposed in the Draft 1 Specification given the low market share of door options at the  $\leq 0.25$  U-factor rating as was demonstrated in WMA's Draft 2 comments; the negligible energy savings that the  $\leq 0.25$  U-factor would offer a consumer in comparison to the high cost of purchasing such products; and the fact that doors should not be subjected to a more stringent requirement if doors represent a much smaller amount of surface area in a house than windows and therefore have a lesser impact on household energy use than windows.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Jessica Ferris".

Jessica Ferris, Director of Codes and Standards  
World Millwork Alliance (WMA)