

From: [Darren Macri](#)
To: windows@energystar.gov
Subject: Energy Star Comments
Date: Monday, August 23, 2021 2:02:14 PM

To Whom It May Concern,

We support the proposed revisions to the Energy Star windows program because it makes good sense to building owners, to the nation and to firms like us in the window industry. My company, Wythe Windows, manufactures high performance triple pane and dual pane tilt turn windows at our automated facility in Ramsey, NJ. We have 3 production lines and we can cut and mill 1000 Passive House quality window frames in 8 hours.

Energy Star requirements have not been updated in some time. In some states new energy codes and reach codes are pushing window U to .24 and below; it's confusing if Energy Star is not better than code. The fact that ENERGY STAR is .21 all across Canada but much higher in the U.S. is confusing since many of the climates are similar.

We are seeing more activity in the Passive House design space- these often require windows in the .16-.20 range; builders are now importing some of these products from Europe when they could be sold by US manufacturers if they were more widely available. New lower U value requirements should create more market interest and volume sales for these products and help justify our past investment and further investments for new production lines.

As a small but innovative window company, we see no obstacles to providing the designs and solutions needed to achieve the new targeted U values. There are a range of glass options, coating options, spacer options and frame insulation options that we use now to meet the spec.

Although ENERGY STAR criteria are evaluated mostly on energy savings, these products will make a home more resilient and comfortable, and we can use that in our marketing as well.

In new homes, triple-glazing will cost more than dual-glazing as noted in your analysis but aside from the energy payback you calculate it might reduce HVAC system size in new homes or renovations which could offset that expense while being better for the environment.

Thank you.

Best,
Darren

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Wythe Windows



Darren Macri

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<https://youtu.be/lwNY04NF1VM>