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From: mfuller@nltubular.com  
Sent: Wednesday, March 25, 2009 4:03 PM  
Subject: Tubular Daylighting Devices Criteria

March 25, 2009

TO: Department of Energy  
Attn: Richard H. Karney  
Washington DC 20585  
FROM: Natural Light Energy Systems  
10821 23rd Avenue  
Phoenix AZ 85029  
SUBJECT: Response to March 11, 2009 Revised Criteria

Dear Mr. Karney,

As a current ENERGY STAR approved manufacturer of tubular daylighting devices (TDDs), this response will be limited to the revisions of the criteria as related only to TDDs.

We at Natural Light gained our energy-star approval based on NFRC certification through NFRC-approved physical testing of our product for SHGC and using NFRC-approved simulation methods for our U-Factor rating. However in 2008, NFRC began to require all new/renewal NFRC certification to require physical testing for U-factor. Please note that there are very few TDD manufacturers yet an NFRC-certified physical testing chamber has been established for this purpose. In order for all manufacturers to meet the identical criteria for energy star rated TDDs, we propose the following:

1. Amend Executive Summary item 5. from "Suspended Tubular Daylighting Devices (TDDs) from the program until industry collects a sufficient body of test results" to "Require Tubular Daylighting Devices (TDDs) to perform to the Revised Skylight Criteria Proposal-Phase 1 while the industry collects sufficient body of test results to warrant separate U-Factor/SHGC for TDDs.
2. Further amend section 2.5 Criteria for Tubular Daylighting Devices to clarify this position by stating that DOE is continuing energy-star criteria for TDDs to the revised skylight criteria as proposed in Table 5 while the TDD industry can gather physical test results to determine if separate criteria are required to more accurately reflect the true energy performance of TDDs.

Natural Light, as a manufacturer of ENERGY STAR products, will invest in physical testing of its products in 2009 even though it is not currently required to do so to meet its NFRC certification renewal because we at Natural Light strongly believe collective physical data gathering by the industry will lead to further energy-efficient TDD designs and thus greater energy savings for the nation as a whole will result.

Please contact me at 602-614-2491 or mfuller@nltubular.com if I can be of further assistance.

Respectfully submitted,

Martin D. Fuller  
President  
Natural Light Energy Systems  
10821 23rd Avenue  
Phoenix AZ 85029

cc: Emily Zachery, D&R Intl