

From: greg upwall
Sent: Tuesday, March 17, 2009 1:41 AM
Subject: comments on draft for Energy Star for windows

Hello,

I am writing in response to the draft of proposed criteria for the Energy Star for windows rating.

My primary comment is in regard to the blanket SHGC that is being proposed for all geographic regions, and the lack of criteria to address air infiltration. My concerns are summarized in the following description that I have copied from a colleague who informed me of this draft proposal.

A blanket SHGC limit is bad policy for two reasons: First, it helps perpetuate the common misconception that there's a "miracle" glass product that can adequately control cooling loads, regardless of orientation, glazing percentage and shading (or lack thereof.) Second, it punishes good design practice by disqualifying windows with a higher SHGC, even if they are oriented and shaded to the point that they are a net positive in the energy balance. Proper orientation, shading and glazing balance benefit all buildings in which they are successfully implemented and are critical to Passive House design, which achieves unmatched levels of efficiency.

Furthermore, there is no mention of an air tightness (infiltration) requirement. Current infiltration testing and reporting (NFRC and AAMA) is OPTIONAL, and inadequate, to ensure that an Energy Star window, door or skylight product is actually energy efficient. Presumably no one would suggest labeling fenestration products with holes through them as energy efficient, yet this is exactly what is being allowed to happen. "Energy Star" has significant impact in society as the "official model" for energy efficiency and the basis for many policies and programs.

I certainly hope that the above concerns will be addressed in the evaluation of ratings for Energy Star windows, and doors.

Thank you,

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