

From: Bronwyn Barry
Sent: Monday, March 23, 2009 5:10 PM
Subject: Criteria Revision-Public

Dear Mr. Karney and Ms. Zachery,

I am writing on behalf of the Passive House California group (www.passivehouseca.org) to urge you to modify the proposed new requirements for *ENERGY STAR* for Windows, Doors and Skylights.

Specifically, we oppose two issues:

1. The limiting of the allowable Solar Heat Gain Coefficient.

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. As the draft report itself states: "DOE has retained limited tradeoffs in this new Northern Zone, in recognition of the benefits of higher solar gain where orientation and conditions are optimal."

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. The revised draft of the DOE Report recognizes the benefits of solar heat gain in Northern climates, but not in other zones, including the entire state of California.

2. The exclusion of any criteria for air-leakage testing requirements.

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.

We hope that these modifications will be included in your revised Energy Star requirements. The "Energy Star" label has significant impact as the official model for energy efficiency and the basis for many policies and programs. Please don't miss this critical opportunity to make changes that could significantly advance the progress of a true standard for energy efficiency across the US.

Sincerely,

Bronwyn Barry
on behalf of
Passive House California

Bronwyn Barry

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