



**Northeast Window & Door Association**  
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Wednesday, March 25, 2009

**Richard H. Karney, P.E.**  
*ENERGY STAR*® Program Manager  
Department of Energy  
Washington, DC 20585

**RE: March 11, 2009, Proposed Revisions to *ENERGY STAR*® Criteria Requirements**

Dear Mr. Karney:

The Northeast Window and Door Association (NWDA) and its membership appreciate the opportunity to provide feedback, comments and suggestions for the proposed revisions to the ENERGY STAR program for fenestration products.

**NWDA Government Relations Committee - Executive Summary**

The Government Relations Committee response to the Windows, Doors, and Skylights Draft Criteria and Analysis report revised March 11, 2009

**NWDA Membership Involvement**

The membership of NWDA has been pro-actively involved supporting the Government relations Committee's efforts to provide the ENERGY STAR program with feedback to the proposed criteria revisions. After receiving the first proposed revision letter and then the second dated January 18, 2008, we circulated the documents to our membership and requested their feedback. The feedback from the membership resulted in a survey prepared by the committee to address the then proposed ENERGY STAR revisions for fenestration products. The survey was sent to our membership; survey results were tabulated and forwarded to the Department of Energy for consideration. We have referenced the survey results of our membership to support our comments in the letter. NWDA also had two representatives attend the stakeholder's meeting. The questions, observations, and recommendations from the meeting were shared with NWDA's Government Relations Committee.

1. Four Zones: NWDA Response: The purpose of the five zone region proposal was to bring the Energy Star regions in close alignment with the IECC regions there by simplifying the code enforcement process. This idea still makes sense even if it resulted in two zones have exactly or nearly the same criteria. This is unfortunate and it shows an unwillingness of the window industry to understand that we are a component of the building codes, energy codes and the country's overall energy policy.
2. The NWDA wants to see the science behind the SHGC numbers in the Northern Zone. Passive solar heat gain in northern regions is good science in the lab. A Delaware energy auditor using a computer modeling program showed that windows with high solar heat gain would not be part of good energy policy with respect to existing housing stock. The existing housing stock in the northern region is generally tract housing and therefore not appropriately sited or designed to take advantage of passive solar heat. Having said that new housing that is built to "green standards" can take advantage of the passive solar heat gain and therefore windows with high solar heat gain would be appropriate in these situations only. So our thought here is to allow windows of high solar heat gain only when



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accompanied by verifiable green building practices supported by an energy audit. The NWDA would also like to see the science behind high U-Factors in the two southern zones. U-Factors deal only with heat flow and thermal dynamic properties which are the same in Portland, Maine as they are in Dallas, Texas. We understand that with current glass technology lowering SHGC any further is not a valid option due to the loss of VT, objectionable increased color of the glass and loss of exterior light harvesting.

3. NWDA has no comment on 1/2 lite doors proposed criteria.
4. NWDA has no comment on skylight proposed criteria.
5. NWDA believes suspending tubular day lighting device criteria until more data can be collected seems to be prudent.

### **Phase 1 Implementation**

NWDA supports the proposed time line for rolling out Phase 1 of the ENERGY STAR program requirements; the committee was unanimous in agreement that manufacturers have sufficient time to revise product lines and marketing materials for a suggested phase in date beginning January 1, 2010.

#### Supplementary Comments:

- NWDA has the technology to make the difference in the overall energy policy today and any further delays waste valuable resources, introduce unnecessary levels of CO<sub>2</sub> into our atmosphere and would consume valuable energy that could go back to the manufacturing sector particularly with respect to load placed on the grid system in the summer.
- NWDA believes in using the best window technology available and does not hang our hat on trying to prolong the lifecycle of outdated technology. Windows that do not incorporate optimal glazing dimensions or those that do not employ the best glass coatings should not drive the decision making process. Energy Star qualified windows by definition should be representative of the best available technologies and failure to use these technologies would be a travesty.
- NWDA believes that debate should be science based. Energy audits should be conducted on existing home stock in each region to determine the best U and SHGC.
- NWDA wants to work with the DOE to reach their stated goals. We ask that the DOE clearly articulate their goals and we will work with them to help solve the energy problem.

NWDA Sub-Committee.

end