Hello Emily, hello Richard
I just became aware of the pending policy change for SHGC of window glass.
I want to express my concern with this US wide restrictions to SHGC for Energy Star qualification.
I find it very limiting to do this as a required window type very strongly depends on the type of installation and architecture it is meant for as well as the area of the country it is installed. If installed in the correct combination with shading devices a very high solar heat gain coefficent window will be very beneficial for the winter months passive heat gain, therefore saving heating energy in the winter. I disagree to an introduction of tying U-vaules to SHGC for Energy Star certification in the way you propose.
As we as a country need to move away from our sole dependence of fossil fuels and mechanical conditioning of buildings this would be a move in the opposite direction.

I operate in central California, SF Bay Area and am therefore most concerned about this area.

	Prescriptive Criteria	
Revised Climate Zone	U-Factor	SHGC
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North-Central	< 0.32	< 0.40
South-Central	< 0.35	< 0.30

I will be limited to choose a low SHGC window in the west facing walls even if I have very well designed shading devices to prevent unwanted heat gain in the summer. Therefore I will not be able to utilize nearly as much of the winter solar heat gain as I could, just because of this restriction.
While I see what you are trying to do, I do not see the implementation to be sound yet. What is the value of tying U value and SHGC together. They are two independend variables that we use to effectively design the heating and conditioning of a home. I do not understand why tying them together in one table and restricting the sensible use of windows outside the range shall be beneficial in all cases.

Thanks for your consideration.

Stefan Carpentier
Design Like You Give A Damn

http://www-stefancarpentier.blogspot.com/

Good design does not begin with what we can do, but rather with questions about what we really want to do.
-- Wann