

November 23, 2011

Doug Anderson  
ENERGY STAR® Program  
U.S. Environmental Protection Agency  
Washington, DC 20460

Dear Doug,

Consortium for Energy Efficiency (CEE) appreciates the opportunity to provide comments on the *ENERGY STAR® for Windows, Doors, and Skylights Version 6.0 Product Specification Framework Document* dated October 2011. CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR Program. CEE members are responsible for ratepayer-funded efficiency programs in 45 US states and eight Canadian provinces. This year, CEE members are directing over \$7.5 billion of energy efficiency program budgets in the two countries. In short, CEE represents the groups that are actively working to make ENERGY STAR the relevant platform for energy efficiency across North America.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We would like to thank EPA for the opportunity to provide comments on this *Specification Framework Document*. The comments CEE submits today are informed by CEE Whole House Committee discussion. Please note that we have not been able to give full consideration to all of the matters addressed in the *Specification Framework Document*, but did want to provide comments on those which we were able to consider.

## Product Differentiation

CEE agrees with the direction of EPA's work to increase the stringency of the ENERGY STAR criteria given the high market penetration of ENERGY STAR windows, doors, and skylights (81 percent for windows, 71 percent for swinging doors, and 99 percent for skylights, according to the Ducker research in the *Specification Framework Document*). CEE generally supports product criteria that provide differentiation in the marketplace while at the same time ensuring adequate product availability, since this increases the likelihood that ENERGY STAR will be an effective tool for voluntary energy efficiency program promotion. CEE understands that EPA typically aims for approximately 25 percent market penetration at the time a specification goes into effect to

achieve these objectives. If EPA intends to use other considerations for determining product criteria levels that depart from the 25 percent program target, CEE would like to further understand the rationale and data behind that decision.

CEE appreciates that EPA is currently in the process of analyzing market information to determine specific product criteria and looks forward to reviewing the quantitative and qualitative reasoning for the product criteria levels proposed in Version 6.0 Draft 1. Energy efficiency programs must understand the rationale and analysis behind performance levels in order to assess the viability of promoting ENERGY STAR products. In particular, any information regarding expected market penetration, incremental retail price, estimated payback periods, and energy savings will help the energy efficiency program community assess their ability to include ENERGY STAR windows, doors and skylights in residential ratepayer-funded programs.

## Air Leakage

CEE sees potential value in EPA adding air leakage requirements to the ENERGY STAR Version 6.0 criteria and harmonizing them with the International Energy Conservation Code to reduce the compliance burden on manufacturers and provide consistency in the market. In order to more fully assess this proposed requirement and potential inclusion of ENERGY STAR windows, doors, and skylights into efficiency programs, CEE would appreciate relevant information regarding the proposed requirement and its relationship to energy performance, durability, and other product characteristics that EPA considers significant to maintaining the brand promise of ENERGY STAR. CEE looks forward to reviewing the specific approach EPA proposes to label and document compliance with this requirement and the rationale for its selection of that approach.

## Installation Instructions

It was helpful for CEE to learn about EPA's experience with poor installation and consumer complaints and CEE supports EPA's commitment to ensuring that products are properly installed and customers are satisfied with their purchases. CEE would like to learn more about the various options EPA considered for addressing poor installation and the rationale for requiring manufacturer instructions to address this concern. In order for CEE to further assess this approach, we would welcome relevant data that demonstrates the relationship between provision of installation instructions and the prevalence of properly installed products.

Efficiency programs may be well positioned to play a role in promoting proper window installation to their trade allies and customers. We offer our joint experience with ENERGY STAR promoting HVAC quality installation as a possible model; this approach may help identify efficiency program opportunities to promote quality installation of ENERGY STAR windows, doors, and skylights.

Thank you for your consideration of these comments. CEE strongly supports ENERGY STAR and appreciates the opportunity to work with you to consider how best to address the comments and questions raised in this letter. Please contact CEE Program Associate Alice Rosenberg at [arosenberg@cee1.org](mailto:arosenberg@cee1.org) or 617-337-9287 with any questions.

Sincerely,



Ed Wisniewski  
Executive Director