

Congress of the United States
House of Representatives
Washington, DC 20515-4201

Comments submitted by Congressman Phil Roe
to the
U.S. Department of Energy's
Energy Star Program's
Windows, Doors, and Skylights Revised Draft Criteria and Report

The Energy Star program is successful program used by the Department of Energy (DOE) and the Environmental Protection Agency (EPA) to educate Americans on which products will save the most energy. Therefore, I believe the program should not shy away from challenges, like differentiating windows with different properties for use in different climates. I applaud DOE for proposing criteria which takes a Solar Heat Gain Coefficient (SHGC) into account in northern climates where more energy dollars are spent heating homes than cooling them.

I support the use of an alternate path in achieving energy savings through windows. The alternate path will give consumers additional choices of products to best suit their energy saving needs related to the climate in which they live. Through scientific research, the Lawrence Berkeley National Lab has determined that in order to realize optimum energy savings across the country – and especially in cool climates – SHGC must be part of the equation. Therefore I strongly encourage you to retain in the final criteria the alternate path which takes SHGC into account.

I understand that in comparison to the criteria that DOE originally proposed, the revised criteria reduces the number of alternatives in the north. While simplification is important, I would like to see consumers given more options and educated to understand that differences in climates require different windows in order to save the most energy. In the original proposal, the Northern Region included trade-offs between Solar Heat Gain Coefficient and U-Factor that are not included in this proposal. Furthermore the .40 cap on SHGC in the North Central Zone doesn't allow for products that will achieve optimal energy savings in the region.

Having said that, I would support proposals which give northern homeowners more – not less – flexibility in choosing the most appropriate energy efficient window for their homes, provided the windows achieve the level of energy savings mandated by Energy Star.

Finally, it is my position that the criteria that was included in the American Recovery and Reinvestment Act prescribing a national standard of a maximum 0.30/0.30 U-factor and SHGC as a tax incentive, defies scientific data and a goal of achieving maximum energy savings for our nation. I encourage DOE to work with the legislative branch to amend this narrow approach that will disadvantage consumers and threaten jobs.

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