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1380 Wayne Avenue ■ Indiana, PA 15701



October 14, 2008

Richard Karney, U.S. Department of Energy
Emily Zachery, D&R International

Dear Mr. Karney & Ms. Zachery,

We at Gorell Windows & Doors have always been a strong supporter of the ENERGY STAR program. As such, we've closely followed your recent efforts to raise the bar for the program. We are very pleased with many of the items that you are proposing in your review of the criteria for ENERGY STAR qualified windows, doors and skylights.

Although we are in agreement with the intent of your proposed changes, there is one item that we feel needs to be reconsidered. We are not in agreement with your proposal on criteria for climate zones ES1 and ES2.

When the early Window & Door guidelines were established, there were only three zones. After further energy modeling analysis, additional zones were created to more accurately reflect the climate data of each region. When the Four-Zone Alternative was created in May of 2003, the main goals of the Department of Energy were to:

- **Maximize national energy savings:** *The ultimate goal of the ENERGY STAR program is to increase the efficiency of the nation's use of energy. The Department's energy analyses indicate adoption of the Four-Zone Alternative would save more energy than the current ENERGY STAR windows qualifying criteria, the IECC 2000 Criteria, and the Three-Zone proposal.*
- **Maintain a competitive market for the glass industry and flexibility for the consumer:** *The Four-Zone Alternative maintains a competitive marketplace for all types of high performance Low-e glass products. It also allows consumers the flexibility to obtain ENERGY STAR windows with different characteristics to accommodate building orientation, passive shading characteristics, or other factors of concern.*

As we all began to discuss the various ways that a consumer can save energy, the concepts of trade-offs were introduced – specifically for the Southern and South/Central regions. In May of 2005, you amended the Window and Door criteria to allow for trade-offs with equivalent performance values. In a letter to the stakeholders you wrote:

In adopting this amendment the Department meets its stated goals of defining alternative qualification criteria that:

- *Offer equal or greater average energy savings than the current prescriptive criteria,*
- *Provide greater flexibility in U-Factor performance ratings,*
- *Meet or exceed prescriptive building energy codes in the applicable regions*

This amendment is expected to:

- ***Provide greater diversity of product alternatives to consumers:*** *The amendment will allow consumers the flexibility to obtain ENERGY STAR qualified windows with different characteristics to accommodate performance, structural, aesthetic or other factors of concern.*

While these two regions, now referred to as ES1 and ES2, are the areas where trade-offs were first introduced, they no longer include trade-offs. Clearly you haven't abandoned the concept of trade-offs, because they are now included in Zones ES4 and ES5. We don't understand why you've abandoned this philosophy in the Southern regions.

We strongly suggest you reconsider this aspect of the proposed revisions to the program. You still can achieve the energy savings that you are looking for, while still allowing consumers several options on how to achieve that goal. We all know that this isn't a "one-size-fits-all" industry. There are various ways that energy savings can be achieved. Specifically in these areas, storm protection, along with energy savings, are a major concern. With the trade-offs, homeowners can achieve both. Without them, they will have to make a choice, and I'm afraid they will choose storm protection, which would defeat the goal of increased energy savings.

We continue to strongly support ENERGY STAR and hope that together we can help consumers to drive down their energy costs.

Best regards,

A handwritten signature in black ink, appearing to read "Wayne C. Gorell". The signature is fluid and cursive, with a large initial "W" and "G".

Wayne C. Gorell
President & CEO