



SIMONTON[®]
W I N D O W S

March 20, 2009

Richard Karney
Department of Energy
Washington, DC 20585

Criteria Revision

Dear Mr. Karney

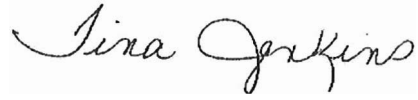
On behalf of Simonton Windows, I would like to take this time to suggest the following changes in regards to the Criteria Revision for 2009 & 2013 Energy Star Program.

1. Simonton agrees with keeping the Energy Star program in line with the IECC code cycle. We further recommend the DOE note that the published values required in 2013 may be revised and an evaluation plan be put in place as we understand the technologies that will be reasonably available to the industry and ultimately the consumer. Our primary concern is that while windows may technologically have the ability to meet the 2013 requirements, there will be tremendous research and capital costs (estimated \$20 million) incurred by Simonton to achieve the stringency of the codes. Naturally, these costs will filter through the supply chain and affect the purchase price paid by consumers. At this juncture, it is nearly impossible to estimate if the increase in prices paid will be offset by the energy savings consumers will realize.
2. We would also request that DOE re-look at the DOE2 and RESFEN6 assumptions for the payback period for Tables 23 and 24. One assumption for example would be to reconsider the 50 windows utilized in the DOE2 analysis. The 50 units are distributed evenly among hungs, pictures and casements windows. We would reason that a distribution of more hungs opposed to casements windows would be more reasonable sampling and can follow the distribution model in the Ducker 2008 study.
3. Though we understand and agree that higher SHGC numbers in the Northern zone are beneficial, we would like to see more of a SHGC range depending on the U-values. Similar to what was originally proposed. The current requirements for the new stimulus package is certainly detrimental to the Northern zone but high SHGC numbers coupled with low U-values will create additional complexities and costs.

Above all these proposals, Simonton Windows would like to encourage DOE to take a step beyond the Energy Star program. There are numerous opportunities for our nation to conserve energy if many of our codes were enforced. We also believe that an awareness and education program needs to be in place to educate consumers of the benefit of purchasing 2009 & 2013 Energy Star compliant window products. Unlike past Energy Star changes to products primarily purchased at the retail level, a majority

of windows and doors are purchased through varying layers of distribution partners and contractors. An educational program focused on these key audiences, as well as consumers, can greatly influence adoption of the revised Energy Star criteria.

Best regards

A handwritten signature in black ink that reads "Tina Jenkins". The signature is written in a cursive style with a large initial "T".

Tina Jenkins
Thermal Code Specialist
Simonton Windows