



To: Mr. Richard Karney – DOE

From: Chris Rix

Date: March 25, 2009

RE: Proposed Changes to Energy Star Criteria for Windows

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On behalf of the 3,000 employees of General Aluminum (GA) and Metal Industries Windows and Doors (MIWD), thank you for the opportunity to comment on the final proposed revisions to the Energy Star® program for Windows, Doors, and Skylights. In general, we are supportive of the final proposed criteria, which seem to strike a reasonable balance between advanced energy efficiency, technological feasibility, and code limitations. We at GA and MIWD have prided ourselves in providing energy efficient products and participating in the previous Energy Star® program.

Several of our company representatives have attended numerous presentations by DOE staff leading up to these proposed changes and have been active in the fenestration industry response and proposals to arrive at performance criteria that make sense for all of us. Therefore, it is somewhat of a surprise to see the overall aggressive stance of the new criteria. We were told on numerous occasions by Dave Maggett and Marc LaFrance that there would be a two-phase process in strengthening the window criteria – The first phase in 2009 and the second in 2012. We do not agree with the new Solar Heat Gain Criteria (SHGC) in the Southern Zone. The previous Energy Star® criteria specified a 0.40 SHGC. The Phase 1 criteria specifies a 0.27 SHGC. This is a very dramatic increase based solely on what the IECC adopted. While we understand and accept that Energy Star® is an “above code” program, the 0.27 SHGC leaves very little, if any, room for additional improvement in Phase 2. Just how low of a SHGC is reasonably justifiable?

We have been in the insulated glass fabrication business for over 40 years and we firmly believe that the cost to manufacture windows with such low SHGCs do not justify the alleged benefits. I humbly ask you to reconsider a 0.33 SHGC for the Southern Zone instead of the proposed 0.27 SHGC.