



Northeast Window & Door Association
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Monday, November 17, 2008

Richard H. Karney, P.E.
ENERGY STAR® Program Manager
Department of Energy
Washington, DC 20585

RE: Proposed Revisions to *ENERGY STAR*® Criteria Requirements

Dear Mr. Karney:

The Northeast Window and Door Association (NWDA) appreciated the opportunity to have participated in the August 13, 2008 *ENERGY STAR*® for Windows, Doors, and Skylights Stakeholder meeting in Washington. Your invitation for us to provide feedback, comments and suggestions for the proposed revisions to the *ENERGY STAR* program for fenestration products is also appreciated.

We also would like to thank you for your continued support to NWDA by the way of attending our general membership meetings to provide our membership with current and accurate information on proceedings that are happening in the *ENERGY STAR* program.

NWDA Government Relations Committee - Executive Summary

The Government Relations Committee agrees with the Windows, Doors, and Skylights Draft Criteria and Analysis report revised August 11, 2008 that the *ENERGY STAR* Logo no longer effectively differentiates energy-efficient windows, doors, and skylights from standard products. And that in many areas of the country, state and local building codes already exceed *ENERGY STAR* criteria for energy efficiency. The report also pointed out that the *ENERGY STAR* market share is at 59 percent nationally, and close to 90 percent in the replacement market. It was reported that in the Northeast and Pacific Northwest, *ENERGY STAR* market share also approaches 90 percent. The committee is in agreement that these numbers in the Northeast are in part from the commitment of NWDA and its membership to research and develop higher performing products and to educate our dealer/distributors on the importance of promoting and selling *ENERGY STAR* qualified window, doors and skylights. There are many manufacturers who have participated and sponsored the “Energize Your Sales” education seminars in the Northeast in support of the program.

An excerpt from the report states “The proposed 2009 International Energy Conservation Code (IECC) model energy code includes prescriptive levels above *ENERGY STAR* in most regions of the country. As more states adopt this code, the *ENERGY STAR* label will become even less meaningful for consumers and homebuilders.” We believe that the Energy Star logo has already become less effective in promoting the highest performing fenestration products making Energy



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Star qualified products commonplace and a commodity product. *Supporting data in Chart NWDA 1A.*

The analysis in the report shows it is technologically feasible and cost-effective to increase the efficiency levels for the ENERGY STAR label. We are in agreement with this report however we concur that the technology and cost effectiveness are currently available and should be considered Phase 1 implementation. The U.S. Department of Energy (DOE) determined energy efficiency improvements based on the current Phase I implementation can deliver annual energy savings of over 8.5 trillion BTUs. Since current technologies provide more energy efficient fenestration products we recommend more stringent criteria than proposed which would result in higher BTU savings. These more efficient products are currently being produced at moderate incremental costs that offer homeowners a positive return on their investment.

NWDA Membership Involvement

The membership of NWDA has been pro-actively involved supporting the Government relations Committee's efforts to provide the ENERGY STAR program with feedback to the proposed criteria revisions. After receiving the first proposed revision letter and then the second dated January 18, 2008, we circulated the documents to our membership and requested their feedback. The feedback from the membership resulted in a survey prepared by the committee to address the then proposed ENERGY STAR revisions for fenestration products. The survey was sent to our membership; survey results were tabulated and forwarded to the Department of Energy for consideration.

August 13, 2008 ENERGY STAR Stakeholder's Meeting

NWDA had two representatives attend the stakeholder's meeting. The questions, observations, and recommendations from the meeting were shared with NWDA's Government Relations Committee and were discussed as stated below:

Phase 1 and Phase 2 Implementation Schedule

Feedback was consistent with regard to the implementation time line for rolling out Phase 1 of the ENERGY STAR program requirements; the committee was unanimous in agreement that manufacturers have sufficient time to revise product lines and marketing materials for a suggested phase in date beginning January 1, 2010. Furthermore, it is suggested a Phase 2 could be implemented January 1, 2013.

IG Glass Certification Requirement

Feedback was consistent with regard to the implementing an IG Certification Requirement in conjunction with the time line for rolling out Phase 1 of the ENERGY STAR program requirements; the committee was unanimous in agreement that current technology exists and manufacturers have sufficient time to revise production lines for a suggested phase in date beginning January 1, 2010. The committee was also unanimous on these IG Certification Requirement inclusions:

- Initial Gas fill rate requirement – Minimum requirement as stated in program i.e.90%



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- Gas fill retention – Use applied science to get a life expectancy for gas retention
 - CBA equivalent accelerated life cycle testing

Conclusion: Current science indicates that inert gases such Argon and Krypton can improve an IG unit's thermal performance as much as 0.04 U-Factor. If an IG unit does not meet a minimum initial fill rate or if the IG materials do not retain the inert gas for the life of the product it will not provide the thermal efficiency as initial rating indicates. Current technology for maximum gas fills (i.e. Quik-Dose¹), initial gas-fill rate measurement non destructive equipment (i.e. Sparklike²) and IG/IG Sealant moisture-vapor transmission rates are used today.

¹Quik-Dose www.besteninc.com/product/quickdose.htm

²Sparklike www.sparklike.com

Add Krypton data

Climate Zone Map Zone 5A

Conclusion: Our committee believes that the Zone 5A consideration was done based on local utilities involvement and complicated for consumers to understand what products meet the proposed criteria. This confusion is escalated when different glass thicknesses are used in the same product based on unit sizes. Local utilities have the right to write their own prescriptive requirements in their local areas that may be more stringent than Energy Star criteria. For these reasons our committee recommends deleting the Zone 5A consideration.

Zones 4 and 5

Conclusion: After careful analysis of zones 4 and 5 it is the recommendation of the committee that these two zones be baseline criteria vs prescriptive criteria, thereby simplify the zone map for consumers, inspectors and manufactures. We support the maximum SHGC of 0.55 for Zones 4 and 5 until the time when site specific modeling can support benefits of winter time solar heat gain SHGC above 0.55. We would be open to re-evaluate our recommendation at that time.

Revised Criteria Affordability

The committee unanimously agreed that 60% of NWDA's manufacturer members currently employ technology that meets the proposed phase 1 criteria. Currently these products are affordable and will remain affordable. The committee's conclusion was based on NDWA's internal survey by the NWDA membership whose survey results were tabulated and forwarded to the Department of Energy.

NWDA Sun-Committee.