



**SIMONTON**<sup>®</sup>  
W I N D O W S

November 14, 2008

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. Impact Products – Simonton believes that impact products (those designed for use in High Velocity Hurricane Zones) should not be removed from the current DOE recommendation and given their own values. There are a number of manufacturers, products and technologies that currently meet the proposed criteria.
2. Given current IECC adoption of a 0.30 SHGC for the most Southern Zone (ES1) Simonton suggests a better compromise for the 2009 criteria would be a SHGC of 0.27 in ES1 opposed to the proposed 0.25 SHGC. The reasoning behind this suggestion is to comply with the desire of the Energy Star fenestration program to increase performance by a minimum 10% over standard IECC standards.
3. 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.
4. Simonton agrees with the trade-off allowance for ESZ4 and ESZ5, instead of a minimum SHGC requirement.
5. 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.

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 cursive script that reads "Tina Jenkins".

Tina Jenkins  
Performance Analyst  
Simonton Windows