

DOE - ENERGY STAR Stakeholder Meeting

I am here to represent the views of VELUX®, the past, present and future U.S. leader in residential unit skylighting. We asked for some time to present our views on the draft skylight criteria changes, as well as the process of arriving at the draft changes.

While we fully support tightening the criteria, if the criteria are too tight, high incremental cost for the improvement will be hard for the market to bear for a discretionary but beneficial category like skylights. We offered input throughout the process with this principle in mind.

A little history might be in order:

In September 2007, we responded to a call for input with a detailed set of aggressive skylight recommendations covering all current and Canadian ENERGY STAR zones.

In December, we further proposed a way to deal with TDD's that would qualify them as ENERGY STAR (at least in Phase 1) if the air leakage and durability requirements for skylight labeling in the 2003 and 2006 IRC and IBC were met. (We continue to believe they should qualify on the basis of lighting energy savings alone, since they are often used where no other means of natural daylighting is practical. Furthermore, their small area minimizes their effect on heating and cooling energy, regardless of current U-factor and SHGC ratings.)

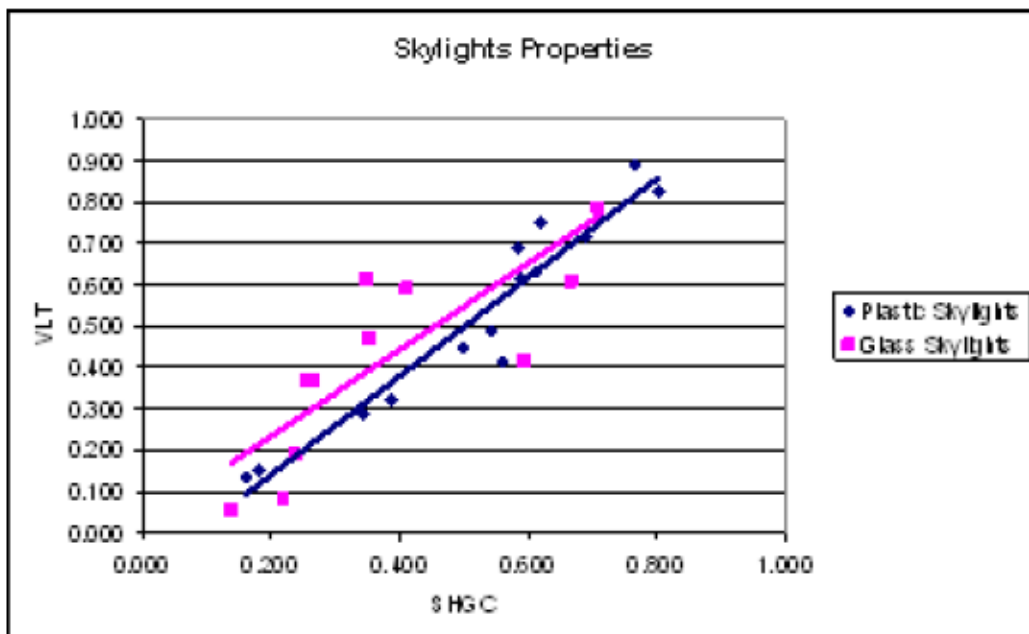
In April, following the initial window proposal in January and the ICC Code Development hearings in February, we were asked by D&R to update our recommendations to account for a five-zone map and a phased criteria introduction. Again we responded as requested, within a matter of days.

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The first proposed changes for skylights were issued by DOE on May 16, which closely aligned with our updated suggestions. Imagine our surprise when the analysis that was issued late last Wednesday contained major differences from the May 16 proposal that were neither explained nor justified anywhere in the new analysis, nor made known to us for comment prior to last Wednesday.

As you might expect, we will be submitting written comments expressing details of our concerns, but I would like to outline some of the major ones today, with your permission.

- Skylights appear to be treated much harsher than windows (see SHGC criteria in Phase 2). This directly contradicts a statement made on page 2 of the report.
We also noted that door SHGC does not tighten in Phase 2.
- There seems to be no consideration for the need to preserve good visible light transmittance in order to reap the significant lighting energy savings skylights are proven to provide.



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- The analysis of NFRC's CPD for skylights is incomplete and flawed, and was not vetted as completely as the windows listings. This is especially critical for proper representation of the much more concentrated skylight market.
- Cost effectiveness analysis for skylights uses incremental cost assumptions that seem arbitrary and understated.
- Using 2009 IECC proposed values might be premature, pending resolution of several wide discrepancies between pending changes to the residential construction chapter of the IECC, and Chapter 11 of the IRC. Since ENERGY STAR is a residential criteria program, we believe the IRC should not be ignored if the final action hearings do not resolve those discrepancies.
- With argon filling of IGU becoming a de facto prerequisite in improved fenestration, has there been an analysis of the likelihood of argon price increases caused by the resulting supply/demand imbalance?
- Phase 1 skylight U-factors on page 57 are different from those reflected on page B-15.
- TDD's are too valuable as energy savers to be excluded for the reason stated.
- Savings for doors are stated to warrant a review in 2011. We think the same should happen for skylights, prior to the implementation of 2013 criteria.

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- It is stated that over half of today's skylights already qualify for proposed Phase 1 levels. We would be interested in seeing the supporting analysis for this conclusion, given the absence of an "Appendix C" -type study for skylights.
- Finally, in our brief analysis of the CPD data (current through last Friday), the curb-mounted segment is going to be severely damaged by the Phase 1 criteria. Very few currently listed models of this type will qualify, due to the overly conservative measurement procedure NFRC uses. Since this segment is most prevalent in the existing installed base, setting the bar this low will greatly slow down the economical conversion of highly inefficient existing curb-mounted stock to dual-glazed, nearly qualified options.

Thank you for offering this opportunity to state our concerns. We look forward to helping resolve them as the process continues.