



August 28, 2023

Mr. Doug Anderson
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW Washington, DC 20460-0001

Subject: 2024 ENERGY STAR Most Efficient Specifications for Windows and Sliding Glass Doors

Dear Doug

On behalf of JELD-WEN Inc[®], we are commenting on the proposed 2024 ENERGY STAR Most Efficient Specifications for Windows and Sliding Glass Doors (SGDs) as provided July 18, 2023. JELD-WEN's comments are provided for your consideration to help encourage greater consumer acceptance of the program, and therefore, greater potential energy savings in the process. To help drive greater energy savings through the ENERGY STAR Most Efficient program, JELD-WEN believes the following recommendations for EPA's consideration represent a more balanced starting point for the 2024 ENERGY STAR Most Efficient specifications for windows and sliding glass doors. JELD-WEN's comments focus on two main areas:

- 1) Recommended changes for U-factors and Solar Heat Gain Coefficients (SHGC)
 - a. Apply the same criteria to both the South-Central and Southern Zones. We propose a U-factor ≤ 0.23 and a SHGC ≤ 0.23 . Implementing those specifications will provide a practical approach that will make it easier for consumers to select from a wider range of readily available, affordable, energy-saving products. This approach will also help EPA move closer to its goal of encouraging Americans to save greater levels of energy through broader acceptance of climate zone appropriate products.
 - b. While JELD-WEN appreciates EPA's intent in relaxing specifications in the South-Central and Southern Climate Zones to allow for the use of dual-paned products, the proposal may not accomplish that goal as the 2024 ENERGY STAR Most Efficient criteria for windows and sliding glass doors. As proposed, many products may still require the use of triple-pane glazing in the South-Central and Southern Zones, and/or require product framing or glazing changes that add significantly to the cost of ENERGY STAR Most Efficient products. Most Efficient criteria set too low may result in the unintended consequences of pricing many American consumers out of the market, thereby possibly missing the opportunity for 25C tax credits as provided by the Inflation Reduction Act of 2022, and perhaps more importantly the consumer misses the opportunity for a more efficient building envelope.
 - c. While JELD-WEN appreciates the desire for ENERGY STAR programs to educate and to inspire Americans on how to make energy-saving choices for their homes, if program

specifications are set too stringent, particularly for the Most Efficient program, it can hamper future program participation and potential energy savings.

- d. If few Americans purchase ENERGY STAR Most Efficient products, the program won't accomplish EPA's goal to help save greater levels of energy. That's why it's important to establish levels that will help save energy, but which won't drive consumers away from purchasing ENERGY STAR or ENERGY STAR Most Efficient products.
- 2) Retain Performance Grade (PG) requirements as listed in the North American Fenestration Standard, formally known as AAMA/WDMA/CSA 101/I.S.2/A440 (NAFS).
- a. JELD-WEN believes the requirement for windows and sliding glass doors should be retained. Although EPA states that building codes reference NAFS, the fact is that code adoption and enforcement is inconsistent across the United States, particularly where windows and doors are being replaced. Accordingly, the PG requirement should be retained to provide consumers assurance of a minimum degree of product safety, durability and viability.
 - b. When fenestration products are proposed for ENERGY STAR Most Efficient consideration, manufacturers provide a copy of the applicable documentation (test report cover page) that includes the product and the NAFS Performance Grade rating. The minimum permitted rating for doors and windows is PG15.
 - c. While JELD-WEN recognizes the challenges to the EPA, including additional time/cost, we believe it is an important component of this program. Therefore, again, JELD-WEN encourages EPA to retain the NAFS Performance Grade requirement for windows and sliding glass doors.

JELD-WEN looks forward to continuing our leadership and partnership with the EPA and the development of the ENERGY STAR Most Efficient program for 2024 to strike a reasonable balance to drive greater energy savings by advancing the ENERGY STAR Most Efficient specifications for window and door products, while continuing the goal of offering our certified products that advance the ENERGY STAR brand and market for the future.

If you have questions about the information provided by JELD-WEN, or wish to discuss it further, please contact me at: sstrawn@jeldwen.com

Sincerely,



Steve Strawn

Program Manager | Codes and Regulatory
Compliance JELD-WEN Inc.