



October 18, 2019

Doug Anderson - Program Manager
ENERGY STAR for Windows, Doors, and Skylights
U.S. Environmental Protection Agency
Sent via email: windows@energystar.gov

Dear Doug,

Marvin appreciates the opportunity to review and submit comments on the *ENERGY STAR Windows, Doors and Skylights – Version 7.0 Specification Discussion Guide* issued in September 2019. We also appreciate the additional time that ENERGY STAR provided to manufacturers to submit comments during this busy time of year.

Marvin offers these comments on key topics we feel are important to our continued ENERGY STAR partnership. We also support comments WDMA and AAMA plan to provide to ENERGY STAR on behalf of their industry members.

Aligning U.S. and Canadian ENERGY STAR criteria:

- Marvin does not recommend that the U.S. ENERGY STAR program continue towards alignment with the Canadian ENERGY STAR program currently. Canada has chosen not to align with the U.S.

Setting a minimum Solar Heat Gain Coefficient (SHGC) in the Northern climate zone:

- Marvin does not support establishing a minimum SHGC for the Northern Climate Zone as no data was provided to support the concept and adds additional regulatory burden on manufacturers.

Combining the South-Central and Southern Climate Zones and moving IECC Zone 5 into the North-Central Zone:

- Marvin could support combining the South-Central and Southern zones and moving IECC Zone 5 into the North-Central Zone depending on what criteria is proposed for those newly combined zones. Without knowing what the new criteria will be, it is difficult to support the concept at this time.

Adopting the latest building energy models to calculate energy savings:

- Marvin supports a different approach that ENERGY STAR could take in creating ENERGY STAR Version 7.0. ENERGY STAR should consider adopting the latest prescriptive performance requirements published IECC Codes for U-factor/SHGC for the ENERGY STAR program. While 50 states and territories are bogged down legislatively, etc. attempting to determine whether it is feasible to adopt the latest code for their respective state, the ENERGY STAR program would implement it much faster than any states could adopt the 2021 IECC. The ENERGY STAR program would essentially be a



better than Code regulation as the limits are established in a much faster timeline. This strategy will eliminate the redundancy to cost justify improvements in energy efficiency as it will have been completed by ICC.

The following is an example of how an ENERGY STAR program could look versus the latest and previous versions of the IECC.

IECC Climate Zone	Fenestration U-Factor (IECC)			ENERGY STAR
	2015	2018	2021	Version 7.0
7 and 8	0.32	0.30	0.30	0.30
6	0.32	0.30	0.30	0.30
5 and Marine 4	0.32	0.30	0.30	0.30
4 except Marine	0.35	0.32	0.30	0.30
3	0.35	0.32	0.30	0.30
2	0.40	0.40	0.35	0.35
1	NR	NR	NR	NR

As of February 2019, according to ICC Adoption by State Chart includes:

- Approximately half of the states have adopted the 2012 or earlier versions of the IECC
- Approximately half of the states have adopted the 2015 IECC
- Several states are in process of adopting the 2018 IECC

How long will it take 50 states to adopt the 2021 version of the IECC?

Marvin believes that this will align Code and the ENERGY STAR program and make it easier for consumers to understand. It may also potentially save the ENERGY STAR program valuable resources that could be diverted to marketing the program towards the replacement window segment to change out an existing housing stock of single and dual-pane clear glazed windows and doors.

Refining methodologies for product availability and cost analyses:

Marvin suggests that EPA continue to rely on the NFRC FenStar database for this purpose and support EPA’s use of it as a reasonable proxy for products available for sale.



- However, there is no function available in the NFRC FenStar database to indicate sales volumes or market penetrations.
- Remember that some products listed in the NFRC FenStar database are not available in the price range of an average consumer but may be more available for consumers considering products in the ENERGY STAR Most Efficient program.

What sources should EPA consider when evaluating what is a reasonable payback period for building materials like WDS?

Marvin feels that consumers expect a reasonable payback return on their investment for energy efficient products that are aligned with average length of homeownership which we believe to be less than 10 years. We support WDMA's comments, regarding sources that EPA should consider in determining the length of payback.

Market Penetration and Certifying Dynamic Glazing and Integrated Shading Systems:

- Marvin believes that these products should be considered for the ENERGY STAR Most Efficient Program since that program is reviewed yearly and taken into consideration as more information becomes available on those products. We do not support them for the ENERGY STAR Version 7.0 program.

Should EPA Consider Allowances for High altitude and/or Impact Resistant Product?

- Marvin believes that this should be given further consideration if the labeling questions can be resolved.

Retail Pricing and Mystery Shopping:

Consider the following strategies:

- Source data from multiple distribution channels and geographical locations including but not limited to:
 - Big box retailers
 - Installing retailers
 - Lumberyards and smaller retail centers
- Use a third party to collect the data and aggregate as needed to establish and maintain confidentiality.
- Consider use of manufacturer industry associations such as WDMA who has experience in consolidating similar data for pay back analysis for the latest ASHRAE 90.1 standard.
- Do not rely on component suppliers to provide pricing information as they desire to hold their pricing to manufacturers confidential. Also, it is the manufacturers that sets pricing of windows, doors, and skylights to the consumer, not suppliers.

Marvin continues to support the ENERGY STAR Programs ability to identify and promote **cost effective, durable** products that reduce greenhouse gas emissions by meeting **consensus** driven energy conservation standards.



Again, the Marvin Companies would like to thank the EPA in its effort to improve communications with the Fenestration Industry.

Respectfully submitted,

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