

ENERGY STAR Version 7.0 WDS Discussion Guide

Feedback from Soft-Lite Windows

Provided by Tyson Schwartz, Senior Vice President of Sales & Marketing

1. Are there better data sources for available products than those proposed in this Discussion Guide?

The sources that are used are acceptable.

2. What are the most common pathways (component combinations) that manufacturers use to make ENERGY STAR certified products?

There are many common pathways – but utilizing specific Low-E coatings by region is the most common. This is something that ENERGY STAR designed, and I believe it is being used effectively. This is to say that consumers are getting the “best” Low-E coatings for their particular area/region.

3. Are there pathways represented in the NFRC CPD that should not be considered viable pathways?

Many times, I see different product combos (CPD) that just are not practical or cost effective to make. If the product combo is not sold (meaning not offered or not sold in a 12-month period), then it should be eliminated. I believe this would eliminate confusion and put manufacturers on a more level playing field.

4. Among the most common pathways, which (if any) energy performance ratings should EPA consider to be outliers?

Refer to my response for #3

5. What sources should EPA consider when evaluating what is a reasonable payback period for building materials like WDS?
6. What other methods for estimating the incremental costs of energy performance improvements for windows, doors, and skylights should EPA consider?
7. Which incremental cost estimation methods are the most accurate?
8. Are there any additional component categories that EPA should consider researching?
9. Should EPA consider combining the ENERGY STAR Southern and South-Central climate zones?

From a manufacturer’s perspective, yes, I would like this. HOWEVER, if I am a homeowner, I wouldn’t want the regions combined. I think you still need to have two distinct zones here. The further south you get, especially in Florida, the more aluminum is necessary for hurricane protection. I think you need to keep the two climate zones separate.

10. What impact would the potential merging of these climate zones have on consumers and partners?

See above, but to reiterate, I think it would become a challenge for a homeowner to get what they want/need for hurricane protection.

11. Should EPA consider setting a minimum SHGC in the Northern climate zone?

I like how it is done currently – with a sliding scale.

12. What impact would a minimum SHGC have on product availability, consumer expectations, and the veracity of the ENERGY STAR label in the window market?

I believe consumers would end up with a product that was not “spectrally” selective for their region.

13. Should EPA consider moving IECC Zone 5 out of the ENERGY STAR Northern climate zone and into the North-Central climate zone?

14. What impact would changing climate zone boundaries have on consumers and partners?

15. What characteristics are most common among ENERGY STAR certified windows sold in IECC Zone 5?

16. Should EPA consider including full-lite sliding patio doors in the ENERGY STAR Windows specification?

Yes – full-lite sliding patio doors should absolutely be included in the Windows specification.

17. What impact would this potential change have on consumers and partners?

I believe consumers would receive a more energy-efficient product for their home. I also believe partners could easily adjust.

18. Should EPA consider sunsetting the ENERGY STAR specification for swinging doors if the analysis does not reveal significant cost-effective energy savings for consumers?

Yes

19. Should EPA sunset just part the criteria if additional cost-effective energy savings are only possible for some products, such as glass-only doors?

20. Should EPA consider including skylights in the ENERGY STAR Windows specification?

21. What significant technical and market differences between windows and skylights should EPA consider in its analysis?

22. Should EPA consider sunsetting the ENERGY STAR specification for skylights if the analysis does not reveal significant cost-effective energy savings for consumers?

Yes

23. What is the market penetration of products with dynamic glazing or integrated shading systems for residential applications? Do stakeholders expect the market for such products to expand in the next few years?

The market penetration of dynamic glazing is still extremely low. It is difficult to produce on any type of scale, which makes the pricing a hurdle. At this point, it may be better to consider this on a future update, not the Version 7.0 specification revision.

24. How should the process for certifying and listing dynamic and/or integrated products be revised to better evaluate the performance and availability of such products?

25. What share of residential WDS are sold in places where high-altitude and/or impact-resistant products are necessary?

26. Should EPA reconsider allowances for high altitude and/or impact resistance in a potential revised specification, and why or why not?

27. Should EPA consider extending the effective date beyond the typical 9 to 12 months after release of a final specification?

I believe the dates are fair, although other partners may disagree. Of course the more time, the better to adjust – but 12 months seems reasonable.

28. How would an extended implementation schedule make it easier to meet a potential revised specification?

It would make it easier for partners, as the testing facilities become overwhelmed when new changes are made. This results in a longer process.