



October 12, 2012

To: Environmental Protection Agency

Re: Comments on the Proposed ENERGY STAR Most Efficient 2013 Criteria for Residential Windows

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This letter is in regard to the request for comments on the ENERGY STAR Most Efficient 2013 criteria for residential windows. Milgard agrees with the general direction of the EPA to encourage technology development to achieve greater energy efficiency and savings within the US. We would like to provide you with feedback on the Proposed Criteria that was sent to us and to outline what we believe would be the best for the EPA as well as the residential window industry.

**Recognition Criteria:**

1. Milgard agrees with this criteria point.
2. Milgard would recommend changing this requirement to reflect that products must be “tested to the NAFS standard by an independent lab” and not require “certification”. This is due to the fact that some products are tested by independent labs to the NAFS standard but sometimes there are other factors that prohibit the certification other than the air, water and structural testing.
3. Milgard agrees with the U-factor and SHGC requirements and understand the purpose for the level set for achievement. However, we do not agree with the requirement for the 0.40 Visible Transmittance value. It is understandable that the goal of the EPA is to have low U-factor and SHGC values while still having adequate Visible Transmittance, letting as much daylight through as possible. During our investigation we discovered that we have several window operating styles (casement, picture window and double hung) with the same “sightlines” but the Visible Transmittance values are different. The reason for the difference is that the thermal simulation size of the various operating styles varies based on the NFRC standard sizes. The result is that the glass percentage is lower for casements versus other operating styles. This results in one operating style meeting the 0.40 VT value while the other operating style falls short. If a manufacturer produced a picture window and a casement of the same size with the same percent of glass, the Visible Transmittance would be different due to the rating standard for the NFRC. Not only will this penalize the window manufacturer, it will also penalize the consumer and make it confusing to understand the difference. The reality is that the actual window performance is the same if the same size products were thermally simulated.

**Recognition Period:**

Milgard believes that the Recognition Period of only one year is too short for residential windows. This does not allow for enough time to develop new technologies to meet the Most Efficient 2014 criteria. Essentially, the Most Efficient program will only be applied to products that already have the technology to achieve the criteria. Unlike other industries that the Most Efficient criteria are used for, window technology evolution is not as rapid and new products are not able to be designed and produced as quickly. The payback period for new models of windows is long and many times is greater than one year. Traditionally, technology in the window industry is cautiously adopted, not because window companies are resistant to change but because it is prudent to test the technology and validate that there are no unexpected consequences. Rapid technology development without proper testing could lead to increased liability and decreased durability or other consequences for the window company or for the consumer. Another concern is that there is no history for the Most Efficient program for residential windows and manufacturers are not able to assume the trend for the next year or even more than one year for the criteria. Without being able to predict the trend Milgard and other manufacturers can only guess and may or may not be able to meet the next year's criteria. There is a much greater gamble with whether a new technology or window model will meet the Most Efficient criteria for the next year and the year after. It would help if the EPA could produce a roadmap to provide some foresight as to what the criteria will be in the future for the Most Efficient program.

Please let us know if you have any additional questions or would like clarity in any of our responses. Thank you for the opportunity to weigh-in on the Most Efficient 2013 criteria and we look forward to participating in future communication opportunities.

Best regards,



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