

## **AAMA Proposes Further Revisions to ENERGY STAR® Program Requirements**

SCHAUMBURG, Ill. -- After extensive meetings with members and industry affiliates, the American Architectural Manufacturers Association (AAMA) provided additional feedback on the most recent proposed ENERGY STAR® Program criteria as they relate to fenestration products.

"It is our intention to collaborate with the Department of Energy (DOE) to reduce energy consumption in existing and new homes; recommend increased enforcement of model energy codes; support the use of ENERGY STAR as a means to communicate more energy-efficient choices for builders and homeowners and work with DOE to drive innovations and technologies that will further the development of affordable and efficient fenestration products," says John Lewis, AAMA's technical director.

Holding true to this commitment, AAMA submitted a joint letter with the Window and Door Manufacturers Association (WDMA) to DOE. Participation in the ENERGY STAR program criteria development is based upon the guiding principle that a simpler Program more readily understood by the consumer is superior to an overly-complex one. This basic approach should include reduction of heat loss and unwanted solar heat gain associated with the existing stock of single-pane windows, skylights and glass doors in the U.S. In addition, affordability should be regarded as one of the foundational elements of the process used to determine Program parameters and is necessary to achieve the desired consumer-driven outcome.

Closely related to affordability is the delivery of energy savings; such savings must translate into immediate reductions of consumer utility expenditures if the criteria are intended to drive consumer behavior. The ENERGY STAR requirements should provide a lower limit to SHGC coefficients in order to maintain the performance of glazing packages and provide an acceptable value for Visible Transmittance (VT). Different approaches that save equivalent energy should be closely scrutinized. In similar fashion, AAMA stressed the proposed standard must not exclude some products which would have equivalent or lower life-cycle energy and environmental impacts.

Other important topics of interest include the timing and implementation of the plan and aligning the current ENERGY STAR zone maps with those of the International Energy Conservation Code (IECC). (View the full joint letter <[http://www.aamanet.org/mp/AAMA-WDMA\\_Energy\\_Star\\_Letter\\_11-14-08.pdf](http://www.aamanet.org/mp/AAMA-WDMA_Energy_Star_Letter_11-14-08.pdf)> sent to DOE.)

In a separate letter, AAMA proposed supplemental recommendations that focused on the importance of accepting equivalent products of varying U-factor and SHGC pairings, clarification regarding the current ENERGY STAR program as a residential program and allowances for alternate SHGC and U-factor values for impact-rated products. (View the full AAMA letter <[http://www.aamanet.org/mp/AAMA\\_Skylight\\_Council\\_Energy\\_Star\\_Letter\\_11-14-08.pdf](http://www.aamanet.org/mp/AAMA_Skylight_Council_Energy_Star_Letter_11-14-08.pdf)> sent to DOE.)

"A preliminary analysis of alternate U-factor and solar heat gain coefficient (SHGC) criteria has shown promising results and is consistent with one of AAMA's guiding principles: 'Equivalent alternatives are just that -equivalent.' We see no justification for eliminating manufacturing options which provide fenestration manufacturers with viable

alternatives to abandoning current production methods, at great cost, for little if any increase in the annual energy savings realized."

The AAMA Skylight Council also submitted comments related to the skylight-specific criteria. The Council also agreed that an industry recognized climate zone map, such as those already established by the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) and IECC, will help to minimize confusion in the marketplace. Much concern was expressed regarding the relationship between SHGC and visible daylight, as well as the increasing cost of argon.

In addition, the Council stated that reducing SHGCs will reduce general lighting power density to the point that skylights will be ineffective at providing an adequate level of lighting without the use of electric illumination. It was recommended that ENERGY STAR only consider skylights that allow electric illumination to be turned off to maximize energy savings.

The group also felt that tubular daylighting devices (TDDs) should not be excluded from qualification, especially in Phase 1. All TDDs should be considered qualified if a dual diffuser at ceiling level is used and the air leakage and durability requirements contained in the skylight labeling provisions of the 2003 and 2006 IRC and IBC are met. (View the full letter <[http://www.aamanet.org/mp/AAMA\\_Skylight\\_Council\\_Energy\\_Star\\_Letter\\_11-14-08.pdf](http://www.aamanet.org/mp/AAMA_Skylight_Council_Energy_Star_Letter_11-14-08.pdf)> sent to DOE from the AAMA Skylight Council.)

"We will continue to work with DOE, AAMA members and the industry to ensure that the ENERGY STAR program benefits the marketplace while taking manufacturer concerns into consideration," Lewis stated.

All AAMA recommendations and comments were submitted to the Department of Energy on November 14, and the association will continue discussions as the Department plans to announce its ENERGY STAR Program targets for 2009 and 2013.

For more information on AAMA's leadership and activities, please visit [www.aamanet.org](http://www.aamanet.org) <<http://www.aamanet.org>> or call 847-303-5664.

*AAMA is the source of performance standards, product certification, and educational programs for the fenestration industry.(SM)*

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Press Contacts:

Heather West, Heather West Public Relations

E-mail: [heatherwest@earthlink.net](mailto:heatherwest@earthlink.net) <<mailto:heatherwest@earthlink.net>> ; 612-724-8760

Angela Dickson, marketing manager, AAMA

Email: [adickson@aamanet.org](mailto:adickson@aamanet.org) <<mailto:adickson@aamanet.org>> ; 714-596-3574