

AAMA Responds to Proposed ENERGY STAR® Criteria

SCHAUMBURG, ILL. -- The U.S. Department of Energy (DOE) released a final set of draft criteria for the ENERGY STAR® program for windows on March 11 and requested a two-week review and comment period from the public with a goal to finalize the criteria by April 3 at the latest. When this occurs, the program will be effective January 1, 2010.

According to Rich Walker, American Architectural Manufacturers Association (AAMA) president and CEO, the American Recovery and Reinvestment Act (ARRA) has played a significant role in influencing the parameters of the new criteria, and on March 25, AAMA submitted a letter in response to the newly proposed ENERGY STAR criteria. This letter was developed after polling the association's membership and soliciting their input. In addition, AAMA asked its members to respond directly to the DOE, as well as providing comments to AAMA about what they liked and disliked about the criteria.

Based upon the poll, AAMA members were concerned about timing of the new criteria and asked to delay the implementation date. "Due to severe economic conditions and confusion with the stimulus tax credit, there is consensus that the implementation should be delayed until the tax credit is out of play," explains Walker.

AAMA members within the commercial segment of the market have also expressed concerns about the changes. Manufacturers of primarily commercial, storefront and curtain wall fenestration prefer multiple disclaimers associated with the criteria to specifically explain that it is residential criteria and that it does not apply to non-residential applications.

To facilitate understanding and application in the marketplace, AAMA encouraged DOE to consider changing the criteria to include three climate zones instead of four; align window Solar Heat Gain Coefficient (SHGC) for Climate Zone 1 with the tax credit for doors and skylights at a value of 0.30; and consider all doors to be in the same category, regardless of their operation.

In addition, AAMA requested a U-factor stretch of 0.03 for high altitude applications, where a breather tube may negate the thermal performance improvements provided by inert gas fill. For the Northern Zone, the association recommended that the alternative SHGC trade off criteria (≥ 0.40) for a U-factor of 0.32 be reduced to a SHGC of ≥ 0.20 or ≥ 0.25 to allow for the use of higher-performing glass that is currently available.

The DOE has made ongoing efforts to include the industry in the development of ENERGY STAR criteria and in particular to revisions made to the previous proposed criteria as a result of stakeholder feedback. AAMA members understand the fine balance between the promotion of superior energy performance, technology incentives and providing a logical purchase option for the consumer.

"AAMA members recognize that the ENERGY STAR for Windows program is a very effective vehicle for easy identification and understanding of energy-efficient products by the consumer. Our members are unanimous in their support of the more interactive approach which encourages input from all industry stakeholders, clarifies DOE's goals and clearly fosters a cooperative effort," according to Walker.

"We believe that continued active participation between AAMA and DOE will yield the best program possible," adds Walker.