



November 13, 2010

Mr. P. Marc LaFrance
US DOE Technology Development Manager
United States Department of Energy Office of Building Technology
1J-018, EE-2J
1000 Independence Ave, SW
Washington, DC 20585-0121

Dear Mr. LaFrance:

We are a 29 year-old window and door specialty dealer operating in Colorado and Wyoming. We support ever improving window performance, including the R5 initiative. However, I fear this program, like Energy Star, looks at the United States Northern Climate Zone as a monolithic marketplace and thus ignores high altitude markets.

On an approximate basis, just 1% of the U.S. population lives above 5,000 feet, with the majority of them in Colorado. We are already a bit challenged to hit the ARRA Energy Efficiency Tax Credit levels, and this challenge will be significantly exacerbated by "commercially available" R5 windows. Since the majority of windows are manufactured below 1,000 feet, an R5 target will likely require either manufacture at elevation, which flies in the face of production economies of scale, and force consumers and contractors to make window selections from an overly limited pool.

Notwithstanding the "truth" of "increasing the R-value from 3 to 5 reduces average heat loss through the windows by 40% and saves consumer money on energy bills" we have done numerous HERS modeled examples of the very small annual difference in heating/cooling cost windows make in an otherwise efficient envelop. Data on these models can be found at <http://www.solarglass.com/wp-content/uploads/2009/02/sfahba-presentation-2-24-09.pdf>. In replacement applications, the savings would be higher but at typical glazing to floor area ratio, R5 over R3 windows will still result in modest utility bill savings. Coupling modest savings with the high altitude challenges mentioned earlier, we strongly urge high altitude alternative targets or exceptions, for the R5 and the Energy Star target levels.

With kind regards,

Gwenael S. Hagan

Mr. Gwenael Hagan
President and Owner

7123 Arapahoe
Boulder, Co 80303-1506
(303)442-4277 Office
(303)442-7417 Fax

301 Air Park Drive
Ft. Collins, CO 80524-2705
(970)234-1930 Office
(970)274-1990 Fax

2931 S. Tejon St. Unit B
Englewood, CO 80110
(303)783-9300 Office
(303)783-0300 Fax

32 Bisbee Ct, Ste A
Santa Fe, NM 87508
(505)988-2001 Office
(505)471-0444 Fax