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AHAM Comments on 25-AAER-01

Please see the attached comments.

Additional submitted attachment is included below.

January 19, 2026

Submitted electronically

Mr. David Hochschild
Chair
California Energy Commission
Docket Unit
715 P Street
Sacramento, CA 95814

Re: AHAM Comments on CEC's RFI for Administrative Updates to the Title 20 Appliance Regulations; Docket No. 25-AAER-01

Dear Mr. Hochschild:

The Association of Home Appliance Manufacturers (AHAM) respectfully submits the following comments to the California Energy Commission (CEC) on its Request for Information (RFI) for Administrative Updates to the Title 20 Appliance Regulations; Docket No. 25-AAER-01.

AHAM commends the CEC for making the effort to harmonize energy efficiency standards with the Department of Energy (DOE or the Department) to the greatest extent possible. AHAM aims to advance that effort by providing recommendations on opportunities for CEC to improve phrasing and references to ensure clarity and harmonization with federal regulations.

Specifically:

- In the face of uncertain federal actions on previously finalized standards, AHAM urges CEC to maintain harmonization with federal regulations which could require later action outside of its usual review period.
- In order to better clarify CEC's intent, AHAM recommends that CEC replace the term "basic model" with "model number" and avoid confusion with DOE's definition of a basic model.

I. AHAM Urges CEC To Maintain Harmonization With Federal Regulations.

As stated above, AHAM appreciates CEC's work to harmonize energy efficiency standards with federal regulations to the greatest extent possible. DOE has open rulemakings on proposed deregulatory efforts from May 2025, and the industry is still waiting to see how the Department will formally adopt short-cycle product classes, through either guidance or rulemaking. In addition, DOE has taken action regarding its air cleaner regulation that could affect reporting at

the federal level. If CEC advances these standards, requires certification ahead of DOE's timeline, or requests data beyond what is required by DOE, this could create confusion for manufacturers and retailers and raise issues regarding preemption under EPCA. Therefore, CEC should consider the uncertainty surrounding many of these regulations and continue to prioritize harmonization with DOE when finalizing updates to Title 20, especially as it relates to timing.

Assuming the amended standards go into effect without delay, the following referenced efficiency standards and test procedures would need to be updated:

1. Clothes Dryers – 10 CFR part 430.32(h) and Appendix D2 to subpart B of part 430
2. Clothes Washers – 10 CFR 430.32(g) and Appendix J to subpart B of part 430
3. Cooking Products – 10 CFR part 430.23(i)
4. Dishwashers – 10 CFR Section 430.23(f) and Appendix C1 to subpart B of part 430
5. Microwave Ovens standards – 10 CFR 430.21(j)
6. Refrigerator-freezers standards - 10 CFR 430.23(a)
7. Room air conditioners – 10 CFR 430.23(b)

Again, please note that DOE has open rulemakings in some of these areas that could affect the outcome of those standard updates.

II. CEC Should Update The Term “Basic Model” To Better Reflect Its Practices.

Currently, the definition of “basic model” in Title 20 directly cites the DOE definition for “basic model” in 10 CFR 430.2, and that term is consistently used throughout the statute. However, in practice, there are significant differences in how DOE and CEC interpret the term “basic model,” which affects manufacturer reporting and retailer verification. These differences are acceptable, but it is confusing for CEC to refer to DOE’s definition and interpret it differently. Specifically, DOE’s meaning of “basic model” references groups of individual models that have the same energy efficiency or use. CEC does not allow family-level basic models in the same way as DOE. In essence, in practice, CEC instead requires SKU-traceable model identifiers with limited wildcarding. In this case, retailers and others rely on this CEC methodology and, we are not, therefore, suggesting that CEC change its practice. Instead, AHAM urges CEC to update Title 20 to better reflect its unique practices by replacing the term “basic model,” which directly cites the U.S. Code of Federal Regulations, with the more accurate description, “model number.” This will improve manufacturer reporting and ensure retailers can verify model information with greater accuracy.

AHAM appreciates the opportunity to submit these comments on CEC’s RFI for Administrative Updates to the Title 20 Regulations and would be glad to discuss these matters in more detail should you so request.

Respectfully Submitted,



Meredith Birkhead
Regulatory Affairs Manager

About AHAM: AHAM represents more than 150 member companies that manufacture 90% of the major, portable and floor care appliances shipped for sale in the U.S. Home appliances are the heart of the home, and AHAM members provide safe, innovative, sustainable and efficient products that enhance consumers' lives. The home appliance industry is a significant segment of the economy, measured by the contributions of home appliance manufacturers, wholesalers, and retailers to the U.S. economy. In all, the industry drives nearly \$200 billion in economic output throughout the U.S. and manufactures products with a factory shipment value of more than \$50 billion.