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AHAM Comments on CEC 2018 Appliance Efficiency Rulemaking (Notice of Hearing-15-Day Language)

Additional submitted attachment is included below.



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July 10, 2018

Commissioner Andrew McAllister
California Energy Commission
Docket No. 18-AAER-10
TN#: 223915
Docket Unit
1516 Ninth Street, Mail Station 4
Sacramento, CA 95814-5504

Re: Docket No. 18-AAER-10 – *Proposed Regulatory Language (Notice of Hearing and 15-Day Language)*

Dear Commissioner McAllister:

The Association of Home Appliance Manufacturers (AHAM) would like to comment on the *Proposed Regulatory Language for the Amendments to Title 20 Appliance Efficiency Regulations* (Docket 18-AAER-10). AHAM represents manufacturers of major, portable, and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM appreciates that CEC incorporated a number of recommendations made in our comments submitted on May 14, 2018. Adopting those recommendations is another step toward harmonization of energy efficiency standards with the Department of Energy (DOE). That being said, AHAM urges CEC to reconsider our recommendations not incorporated in this revision.

AHAM supports referencing federal regulations for the definitions (Section 1602). There are numerous long-term benefits in doing so. AHAM appreciates and agrees with CEC's updated testing methods for home appliances citing federal regulations, i.e. Appendices to 10 C.F.R. subpart B of part 430. Each of these appendices also include definitions applicable to the tested product and are the exact same definitions. An update federally will automatically update California definitions instead of going through the entire regulatory process. Separate definitions and the delay that accompanies their update can be problematic and cause unnecessary confusion. This can be the case with the introduction of a new definition, or change to an

existing definition affects the testing of a product / component. AHAM strongly urges CEC to consider a transition to referencing DOE definitions in the next iteration of regulations.

In regards to specific recommendations, AHAM requests CEC to reconsider the following:

A. Section 1604. Test Methods for Specific Appliances; (d) Portable Air Conditioners, Evaporative Coolers, Ceiling Fans, Ceiling Fan Light Kits, Whole House Fans, Residential Exhaust Fans, Dehumidifiers, and Residential Furnace Fans

AHAM reiterates the need for differentiation between spot air conditioners and portable air conditioners. They each serve fundamentally different purposes. The proposed changes to the title of this section (Section 1604(d)) and the accompanying table (Table d-3) only replace “spot” with “portable” while leaving Spot Air Conditioners in the table with a distinct test procedure. We recommend two changes to this test procedure section. First, “spot” should remain in the titles of the sections and related table. Second, although we appreciate CEC acknowledging the DOE test procedure for PACs, inclusion of this federal test procedure in the regulations is premature, and only creates confusion for manufacturers and retailers. Currently, there is no compliance date set for the federal PAC energy efficiency standard and there are no reporting requirements to CEC so listing an unnecessary test procedure will cause confusion over whether something is required for this product.

B. Section 1607. Marking of Appliances (10) Battery Charger Systems (pg. 301)

AHAM understands CEC’s intention to align applicable battery charger regulations with the DOE, as it is a federally regulated product. The Regulatory Advisory bulletin published on June 7, 2018 clearly explains the transition. However, this rulemaking would keep the marking requirements. We understand that this issue is being resolved in another rulemaking (18-AAER-02) and appreciate CEC’s efforts in this area. This could be confusing to manufacturers, as according to the Regulatory Advisory, CEC will no longer require the “BC” mark as of October 1, 2018. AHAM requests CEC add clarifying language in the Final Statement of Reasons that states the “BC” marking is only required for state regulated battery chargers. In addition, with battery chargers now federally regulated, this product should now be under Section 1607(d) with the other federally regulated products.

C. Section 1605.3 State Standards for Non-Federally-Regulated Appliances

LED lighting is critical to appliance range hoods As AHAM stated in previous comments, LEDs are very sensitive to heat and do not function well in temperatures above ambient temperatures. It can be the case that each 20°C increase in temperature will typically drop the life span by 10,000 hours. In addition, the AC to DC driver for the LED is heat sensitive and each 10°C increase in temperature will typically reduce the lifetime of the driver in half. For range hoods, the UL 507 standard used to evaluate hoods allows a maximum temperature of 85°C in the lab test, which is well above ambient. Further, LEDs may not function well in vent hoods when the light is on its lowest setting.

Lamps in some appliances can reach temperatures that make it cost effectively impractical to use typical LED lamps. Even if there are specialty LED lamps that are part of an appliance at time of sale, these would likely not be widely available in retail for customers who need to

replace a light bulb. In addition, in a range hood the LED may be enclosed retaining heat and further accentuating the problems with heat. As such, greater exclusion for high temperature application, such as range hoods, is needed for the General Services Lamps standard, the Small Diameter Directional Lamps standard, and the LED Lamps standard.

AHAM appreciates the opportunity to comment on the proposed language amendments to the Appliance Efficiency regulations and is glad to discuss these matters further with the Commission.

Sincerely,



Kevin Messner
Senior Vice President, Policy & Government Relations