

DOCKETED

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Comment Received From: Home Ventilating Institute (HVI)
Submitted On: 1/6/2020
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HVI Comments on the AHAM Kitchen Range Hood Directory Approval Application

Please see attached file: HVI request to CEC to deny AHAM proposal for alternate Title 24 directory 01062020.pdf

Additional submitted attachment is included below.



6 January 2020

TO: Mr. Peter Strait Supervisor, Building Standards Office
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

RE: Docket 19-BSTD-10 Comments – AHAM Kitchen Range Hood Directory
Approval

The Home Ventilating Institute (HVI), founded in 1955, is an international nonprofit association of the manufacturers of home ventilating products. HVI's core purpose is "making indoor air healthier." Through its Certified Ratings Programs, HVI provides a voluntary means for residential ventilation manufacturers to report comparable and creditable product performance information, based upon verification testing performed by independent, third-party laboratories, using uniformly applied standards and procedures. Certified performance ratings include airflow, sound and energy.

Today, HVI represents manufacturers from North America, South America, Asia and Europe, producing the majority of the residential ventilation products sold in the United States and Canada. HVI certification is a prerequisite for obtaining the ENERGY STAR® rating and California Energy Commission Title 24 compliance for mechanical ventilation equipment.

AHAM has requested CEC's approval for an alternate listing directory for kitchen range hoods using a new and unproven internal procedure. HVI advises against approval of the AHAM's request as it will cause confusion for HERS raters, consumers and other stakeholders, negating the current assurances of accurate product performance results now enjoyed with the HVI Certified Ratings Program. AHAM has attempted to show complete concurrence with the established HVI programs and testing procedures, however, we have concerns and urge the CEC to investigate prior to making a determination on AHAM's proposal.

1. Intertek Cortland lab is identified as an approved CEC Laboratory only for airflow using HVI Publication 916©. However, the lab's capability to test for sound according to HVI Publication 915 has not been established. The Title 24 requirements for range hoods require certified some ratings of 3 sones or less. Lack of ability to provide the airflow, sound and wattage measurements would disqualify the lab for certifying Title 24 range hood performance requirements.

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On December 11, 2019, HVI submitted an inquiry to Intertek Cortland to assess their capability to test to HVI Publications 915 and 916. Our interest was to investigate if Cortland could also be qualified as an HVI third-party approved laboratory. We received a response on December 17, 2019 that they decline our request to quote. The lab has not responded to our request for a reason they declined to work with HVI.

2. Within the AHAM Comparison Map submitted (TN#230497), there are erroneous statements shown. First, AHAM claims that on September 11, 2019, HVI issued a "Press Release" stating (sic) a program which would allow HVI to accept performance data from first-party (manufacturers' in-house) testing labs for purposes of HVI certification. There was no press release; however, there was an internal message to HVI member companies to survey their readiness to participate in the testing program.

If the Intertek Satellite Data Program is to be utilized, then its first-party labs must meet the requirements of HVI Publications 915 (sound) and 916 (airflow). Furthermore, if a first-party lab intends to test for ENERGY STAR certification, the lab must meet the criteria established by EPA/ENERGY STAR for either the Witnessed Manufacturers' Testing Laboratory (WMTL) or Supervised Manufacturers' Testing Laboratory (SMTL) programs (August 2019). HVI, working with US EPA, has incorporated the SMTL program requirements into the HVI First-Party Laboratory Testing program. HVI is not aware of any non-HVI member manufacturer's lab that meet the construction and equipment specifications required in HVI Publications 915 and 916.

3. One of the justifications used for AHAM proposal is insufficient lab availability to test range hoods for Title 24. HVI is re-establishing the Air Movement and Control Association (AMCA) lab in Arlington Heights, Illinois as an HVI Designated Laboratory for testing range hoods as well as other product categories within HVI's program scope. The AMCA lab is already actively listed as an approved CEC lab for Residential Exhaust Fans.
4. On November 13, 2019, HVI submitted a petition to the California Building Standards Commission that was addressed to Executive Director Marvelli. In the submitted petition HVI requested that the January 1, 2020 implementation of the Title 24-2019, Part 6, Sections 120.1(b)2Bii and 150.0(o)2B requirements for HERS verification of HVI range hood product ratings be delayed for 180 days to accommodate testing and certification of a wider array of products to comply with Title 24-2019.

Our rationale for the request was that there is a current backlog of testing due to the influx of manufacturers in need of product testing for Title 24 compliance. After the resolution of this late entry influx, the HVI Designated Laboratories should have no problem keeping up with demand.

5. HVI is concerned whether AHAM's ENERGY STAR product verification is as robust as HVI's program. While ENERGY STAR is not a criterion for Title 24 compliance, HVI believes the ability to test, certify and verify to ENERGY STAR is an indicator of a program's capability to meet stakeholder needs.

The AHAM comparison map (TN#230497) indicates, under 9.1.3.2, that should a product fail an ENERGY STAR verification audit, there are to be 3 more samples available to test for verification. HVI has no such provision as the HVI process is established and both stakeholders and members alike have confidence in the validity of verification results. The AHAM program also utilizes a 48-hour run-in for all products to be verified. The intent is to identify products that would have early failure and exclude those from verification testing. The HVI method is more indicative of the consumer experience by procuring a unit on the open market and testing the unit as-is.

6. HVI continues its development of the Range Hood Capture Efficiency (RHCE) program with anticipated testing to begin in second quarter 2020. RHCE has been a noted desire for both ASHRAE and CEC for ensuring consumers have proper kitchen ventilation. HVI Publication 917: HVI Range Hood Capture Efficiency Testing and Rating Procedure© has a clause that allows range hoods that were certified to HVI Publications 915, 916 and 920 prior to the adoption of HVI Publication 917 to be procured on the open market and tested at the established Certified Product Directory rated airflow point for RHCE only. This allows a lower cost testing program for previously certified range hoods. This program would not be available from HVI for AHAM certified range hoods.

In summary, HVI recommends rejection of AHAM's proposed alternative Title 24 directory for range hoods. While AHAM attempted in its narrative to show it is capable of a nearly identical program by using HVI Publication 920© as its basis, we feel there are fundamental differences which create risk for California consumers, HERS raters, and the product manufacturers. The HVI Certified Products Directory is referenced in CEC and ASHRAE 62.2 for good reason. It has been proven over its 65 years of reporting product performance that its ratings are consistent, reliable and fair to all stakeholders.

Thank you for the opportunity to provide these comments and for your consideration. If you have questions, please reach out to HVI Engineering Director, Jim Boldt, at industry@hvi.org.

Kind regards,



Jacki Donner, CEO

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