

**DOCKETED**

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*Docket Number: 19-BSTD-10*

**LGEUS Comments on AHAM Range Hood Approval; Docket 19-BSTD-10**

*Additional submitted attachment is included below.*



**LG Electronics USA Inc.**

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February 12, 2020

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

**Re: Application for Authorization for Alternative Procedure to Demonstrate Compliance with Part 6**

Dear Mr. Strait:

As a leading provider of advanced home appliances for California homeowners and builders, LG Electronics USA is pleased to support the above-referenced application by the Association of Home Appliance Manufacturers (AHAM) seeking authorization for the use of the AHAM Kitchen Range Hood directory as an equivalent, alternative method of compliance with Part 6 where use of the Home Ventilating Institute (HVI) Kitchen Range Hood directory is required.

LG designs and manufactures many innovative kitchen appliances with features such as Inverter Compressor technology and Easy Clean interiors. Our state-of-the-art range and cooktop hoods are available in two sizes in both black stainless steel and traditional stainless steel. They offer a satin-smooth fingerprint- and smudge-resistant finish, a low-profile body, 5-speed touch controls, powerful 600 CFM Blower for excellent ventilation, dual-level LED lighting, and ThinQ (Wi-Fi) capabilities. LG's over-the-range microwave ovens also include ventilation capabilities. Due to their high performance and style, our kitchen appliances are consistently ranked at the top of consumer preferences and satisfaction.

We agree with and support the justifications set forth in AHAM's application. LG is confident that this alternative will reduce costs and promote product quality. AHAM's program and directory are equivalent to the HVI directory, and the alternate AHAM system will result in equivalent air flow and sound testing of kitchen range hoods.

Adoption of the application will inject needed competition into the marketplace, providing both manufacturers and consumers desirable options regarding kitchen range hoods. Such options are especially needed because of insufficient lab testing and certification capacity, which have resulted in a growing backlog of product certifications. Obviously, this stifles the use of desired products (including increasingly energy-efficient products) by California consumers.

Upon approval of AHAM's application, it will be important to avoid any potential confusion among consumers regarding appliances. Therefore, we endorse AHAM's planned public announcements and other outreach to consumers and retailers to ensure their awareness of the new directory and program.

We urge the Commission to approve AHAM's application. Should you have any questions, please contact me or my colleague Tony Ye ([tony.ye@lge.com](mailto:tony.ye@lge.com), 201-266-2421).

Cordially,

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