

DOCKETED

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*Comment Received From: Matthew Friedlander
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Recommend against Approval of AHAM Product Directory for use in place of HVI Directory for Kitchen Range Hoods

9 January 2020

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

Re: Docket No. 19-BSTD-10, Application for Approval of AHAM Product Directory for use in place of HVI Directory for Kitchen Range Hoods

Dear Mr. Strait:

I am writing to recommend that CEC reject AHAM's application.

RenewAire LLC is a member of HVI. We manufacture Energy Recovery Ventilators (ERVs) for residential and commercial applications and our products are sold and installed throughout the United States.

As long-standing participants in HVI's ERV certification program we are familiar with its processes. Additionally, we are familiar with the Intertek facility in Cortland NY, as we also participate in AHRI's 1060 ERV exchanger certification program, for which ITS Cortland provides third-party testing, and contract private tests in Cortland on a regular basis. RenewAire is not directly affected by this issue, as we do not manufacture kitchen range hoods. But we do have an interest in maintaining HVI's position as the recognized certification body for residential ventilation products. Manufacturers in the residential ventilation business spend significant resources on third-party product certification and it is more efficient to have the programs administered by a single organization, as HVI has done for many years.

RenewAire favors encouraging consumers to understand and use energy efficiency and other figures of merit when selecting residential ventilation products. Allowing for multiple associations to be the source for this information likely will increase confusion.

It is clear that there have been testing backlogs and I understand how constraining that is for manufacturers. I would prefer to see a solution to this problem based on addition of testing facilities, including AMCA and Intertek-Cortland, with all certification and verification administered within the established HVI certification program.

Sincerely,

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