

DOCKETED

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Statement in Support of AHAM Application

See the attached correspondence.

Additional submitted attachment is included below.



GE APPLIANCES
a Haier company

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February 14, 2020

Via Online Submission (Docket No. 19-BSTD-10)

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

Re: Support for the AHAM Kitchen Range Hood Directory Approval; Docket No. 19-BSTD-10

Dear Mr. Strait:

GE Appliances, a Haier company ("GEA"), respectfully submits the following comments in support of the updated application filed on January 24, 2020 by the Association of Home Appliance Manufacturers ("AHAM") to establish a kitchen range hood verification directory consistent with the requirements of California Title 24, Docket No. 19-BSTD-10.

GEA supports the initial application of AHAM and the statements therein as well as the additional statements made by AHAM on the record, particularly those in response to the statements of the Home Ventilation Institute ("HVI"). GEA adds additional comments to provide information pertinent to GEA, provide individual company positions, and to highlight the importance of several of the concerns raised in AHAM's application and additional statements.

GEA is a leading, US manufacturer of home appliances. GEA offers a full suite of home appliances across seven brands, including a full line of range hoods and over-the-range microwaves that include range ventilation. GEA has been a participant in and contributor to federal and California state regulatory programs for over 40 years. GEA has numerous first party labs certified to ISO 17025 and certified by recognized energy star verification partners such as UL and CSA. GEA operates more than 100 first-party energy and performance verification and testing labs in the United States and has scores of employees who sit on and chair US and international standards making bodies, including ASHRAE, ASTM, UL, CSA, and IEC.

GEA has been a member of HVI for many years, has had employees on the board of HVI and employees who have acted as chairs or vice chairs of HVI committees and task forces. Nevertheless, GEA has significant concerns about the quality of HVI's test procedures and the reliability of HVI's certification program. Based on its experience with HVI, GEA believes that the best way forward for consumers, regulators, and manufacturers is through market-based competition for high quality, reliable, accurate testing and certification services.

GEA's concerns about the HVI certification program are best represented by the low verification pass rates in the HVI certification program. In 2018, the last year for which statistics are available, only 58% of standard ventilation fans passed verification, and numbers for successful verification are as low as 20% of products tested. This information is provided by HVI in its annual report, which is attached as Exhibit A.¹ Many root causes for the poor performance of HVI's certification program are possible: a poor third-party lab, poor test procedure, poor sample selection process for certification, lax procedures for relisting a non-conforming product, or insufficient consequences for product that fails verification. The root cause, however, is unknown and likely will not be known for some time as HVI currently has no program or plan in place to address this significant issue.

GEA has significant experience with the AHAM Verifide program and knows it to be a rigorous program backed by significant engineering expertise and continuous improvement. In addition to running a certification program for air cleaners and now range hoods, AHAM runs an Energy Star certified verification program for clothes dryers, clothes washers, dehumidifiers, dishwashers, and refrigerator/freezers. This makes AHAM an ideal organization to become invested in range hood certification and the improvement over time of the range hood certification system. Indeed, AHAM and its members have become active in the relevant ASHRAE committees to address concerns with the existing range hood certification standards and to assist in developing effective, proven, repeatable testing for range hood capture efficiency.

It is important to note that the proposed AHAM program is equivalent to the HVI program as it exists today and complies with all requirements of Title 24. Through this application, it is GEA's understanding that AHAM seeks to become an independent implementer of existing ASHRAE and HVI standards and test procedures and CEC regulations. Competition on a level playing field with matching standards and test procedures but with separate administrators and an additional third-party lab will play an important role in ensuring the quality and accuracy of range hood certification programs. Further, AHAM's role in this space through its certification program will help it to engage as a contributor to the improvement and development of standards and test procedures in the range hood space in collaboration with CEC, ASHRAE, and HVI.

The entry of a new certification program is essential to ensure fair competition regarding services for the certification of kitchen range hoods. An additional certification program

¹ Exhibit A -

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will not only benefit California consumers by accelerating certification decisions, the increased competition will also reduce manufacturer's testing costs and improve efficiencies. For all these public policy reasons, we support AHAM's application.

GEA appreciates the opportunity to provide these comments. Please do not hesitate to contact me with any questions or concerns.

Very truly yours,

A handwritten signature in black ink, appearing to read "John T. Schlafer". The signature is fluid and cursive, with a long horizontal stroke at the end.

John T. Schlafer