

DOCKETED

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APP-TECH Inc recommends approval

APP-TECH Inc. recommends approval of the AHAM Product Directory for Kitchen Range Hoods as an alternative to the HVI Directory.

Additional submitted attachment is included below.

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APP-TECH Inc. recommends approval of the AHAM Product Directory for Kitchen Range Hoods as an alternative to the HVI Directory.

The California Energy Commission (CEC) allows alternative methods for verifying Kitchen Range Hood performance specifications.

The CEC has several methods of demonstrating compliance with the requirements for listing the performance of regulated devices, in this case Kitchen Range Hoods (Attachment A). The primary listing is usually the CEC Appliance Directory. Acceptable alternatives are federal agency directories or approved trade association directories. Many companies have Kitchen Range Hoods listed in the CEC Appliance Directory, including Broan-Nutone, LLC (Attachment B). It seems silly for Broan to state that listing in more than one directory would be confusing, when, in fact, Broan already has listings in the CEC Appliance Directory, the federal Energy Star directory, and the HVI Directory. According to Section 110.1, any one of these listings is sufficient. Adding another directory alternative will not materially increase confusion. In fact, adding competition may incentivize HVI to improve testing facilities and reduce their backlog.

The CEC revision to Section 150.0 (o) 2.B. in the 2029 Energy Code is incorrect.

ASHRAE 62.2, Table 5.1 that specifies minimum Kitchen exhaust rates has changed in the 2016 version of ASHRAE 62.2. The previous version, in ASHRAE 62.2 – 2010 (Attachment C), only referred to vented range hoods. The 2016 current version (Attachment D) includes different rates for several different Kitchen exhaust systems. It appears that the Kitchen Range Hood verification requirement in Title 24 Part 6, Section 150.0 (o) 2.B. is based on an obsolete requirement.

ASHRAE 62.6 – 2016 as revised and adopted by the CEC has the following requirements (Attachment E) for air-moving equipment used to comply with this standard. Ventilation devices and equipment shall be tested in accordance with ANSI/ASHRAE Standard 51/AMCA 210 (currently the 2016 version). This equipment shall be rated in accordance with the rating procedures of HVI 915, HVI 916, and HVI 920. There is no requirement that Kitchen Range Hoods be listed in any specific directory, such as the HVI Directory.

ASHRAE 62.2 allows for two alternative methods for fan performance verification. Performance: where the ventilation rate is directly measured, or Prescriptive: where directory test results are used to verify expected operation. When the Prescriptive method is used, ASHRAE 62.2 also requires verification of correct duct sizing (Attachment F).

Section 150.0 (o) 2.B. is wrong and contradicts the requirements of the CEC revised ASHRAE 62.2 – 2016 adopted and published by ASHRAE Publications. It also conflicts with the “Local Mechanical Exhaust” HERS Verification form (Attachment G) which was specifically developed

for the 2019 Energy Code. Note that this form requires verification of the Kitchen Exhaust System, not the Kitchen Range Hood!

Emergency Rulemaking Petition

APP-TECH Inc. initiated a request for the CEC to hold an Emergency Rulemaking procedure (Attachment H) to amend Section 150.0 (o) on January 27th 2020. This request also asked the CEC to schedule a pre-rulemaking workshop to obtain public comment on ways to improve these ventilation requirements. A date for this meeting has not yet been set. Interested parties should contact the CEC Executive Director, Drew Bohan, drew.bohan@energy.ca.gov and ask to be notified when this meeting is scheduled.



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