

DOCKETED

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Comment Received From: Phillip Hombroek
Submitted On: 2/17/2020
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Midea Comments - AHAM Application for Authorization for Alternative Procedure to Demonstrate Compliance with Part 6

Additional submitted attachment is included below.



*Midea America Research Center
2700 Chestnut Station Court
Louisville, KY 40299*

2/17/2020

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

Via Email: peter.strait@energy.ca.gov

Re: Docket No. 19-BSTD-10: AHAM Application for Authorization for Alternative Procedure to Demonstrate Compliance with Part 6

On behalf of Midea America Corp (**Midea**), Midea America Research Center respectfully requests for the California Energy Commission to approve the application from AHAM to create an alternative program to evaluate ventilation hoods for sale in California.

1. About Midea

Midea is the world's largest producer of major appliances, and the world's No.1 brand of air-treatment products, air-coolers, kettles, and rice cookers. Midea Group is a world leading technologies group in consumer appliances, HVAC systems, robotics and industrial automation systems, and smart supply chain (logistics). Midea offers diversified products, comprised of consumer appliances (kitchen appliances, refrigerators, laundry appliances, and various small home appliances), HVAC (residential air-conditioning, commercial air-conditioning, heating & ventilation), and robotics and industrial automation (Kuka Group and Yaskawa joint venture). Midea is committed to improving lives by adhering to the principle of "Creating Value for Customers". Midea focuses on continuous technological innovation to improve products and services to make life more comfortable and pleasant.

Midea's United States affiliate is **Midea America Corp**, with headquarters at 5 Sylvan Way, Suite 100, Parsippany, NJ 07054 (tel. 973-539-5330) URL: www.us.midea.com/. Its worldwide headquarters are located at **Midea Group** headquarter building, No. 6 Midea Avenue, Beijiao, Shunde, Foshan, Guangdong, 528311 P.R. China; (tel. 011-86-757-2633-888); URL: www.midea.com/global. **Midea America Research Center**, at 2700 Chestnut Station Court,

Louisville, KY 40299, (tel. 502-709-6067). Its Range Hood headquarters is located at *GD Midea Kitchen and Hot Water Appliances Co. LTD*, No 7. Midea Avenue, Shunde Foshan, Guangdong 528311

2. Support for AHAM Certification program

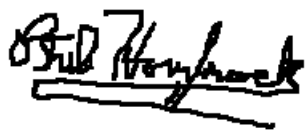
As a new member of HVI, Midea has experienced similar difficulties as other manufacturers between lab, certifier and manufacturer in the HVI program. There have been backlogs in testing and certification paperwork that have directly impacted product availability in the United States. On the other hand, we have had very good experiences in dealing with AHAM certification and verification programs in Air Purifiers, Clothes Washers, Clothes Dryers, Room Air Conditioners and Dehumidifiers. We are very satisfied with the administration, testing coordination, and technical expertise of all involved in the administration of these AHAM programs. We are confident that within AHAM and the proposed testing Lab at Intertek, that there is enough technical expertise and lab capability to administer this program appropriately. We would hope that CEC gives expedited consideration for AHAM to administer this very important program. Midea is confident that this approval will provide the necessary additional testing capability the industry needs to alleviate the testing backlogs.

3. Conclusion

Midea strongly supports AHAM application and strongly urges the commission to approve the application in order to provide manufactures with an alternative option for range hood certification.

Thank you in advance for your consideration and prompt action.

Sincerely,

A handwritten signature in black ink that reads "Phil Hombroek". The signature is written in a cursive style and is underlined with a single horizontal line.

Phil Hombroek
Manager, Government Relations,
Midea America Research Center