

DOCKETED

Docket Number:	19-BSTD-10
Project Title:	AHAM Kitchen Range Hood Directory Approval
TN #:	232062
Document Title:	S&P USA Ventilation Systems, LLC Comments - Opposition of the AHAM Kitchen Range Hood Directory
Description:	N/A
Filer:	System
Organization:	S&P USA Ventilation Systems, LLC
Submitter Role:	Public
Submission Date:	2/17/2020 1:40:27 PM
Docketed Date:	2/18/2020

Comment Received From: S&P USA Ventilation Systems, LLC
Submitted On: 2/17/2020
Docket Number: 19-BSTD-10

Opposition of the AHAM Kitchen Range Hood Directory

Additional submitted attachment is included below.



S&P USA Ventilation Systems, LLC

6393 Powers Avenue
Jacksonville, FL 32217
P. 904-731-4711
F. 904-731-8322
www.spvg-northamerica.com

February 17, 2020

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

Re: Opposition of the AHAM Kitchen Range Hood Directory; Docket No. 19-BSTD-10

Dear Mr. Strait,

S&P USA Ventilation Systems, LLC is the U.S. subsidiary of the world's leading fan manufacturer, Soler & Palau, with locations on 5 continents and offering more than 10,000 ventilation products worldwide.

We support the HVI-Certified Products Directory as the single resource for residential ventilating product certification and oppose any alternative directories for the following reasons:

- There is no reliable process to ensure that ratings and test procedures will not diverge in the future. If CEC recognizes an additional directory that has a framework to establish different procedures, manufacturers will naturally migrate to the one that produces more favorable ratings. This would represent a disservice to both consumers and to scrupulous manufacturers.
- We are confident that HVI will eliminate the testing backlog at the primary third-party laboratory, REEL, by expeditiously adding new labs such as AMCA and Intertek. This will create the increased capacity that the industry needs.
- In order to ensure that all labs are held to the same level of stringency, the industry needs a single source for product testing requirements and standard development. This single source already exists with HVI and is comprised of the world's leading ventilation product manufacturers, consultants, and third party labs.
- We encourage manufacturers of unlisted products to list their products with HVI, and we support an extension of the deadline for enforcement of the Title 24 range hood provisions for a reasonable amount of time to allow these manufacturers to continue to sell their products in California and to foster open competition that is beneficial to both consumers and industry.



S&P USA Ventilation Systems, LLC

- We support HVI's fair and equitable treatment of manufacturers and candidate laboratories, and we encourage CEC to continue to support the ASHRAE 62.2-recognized rating program moving forward.

In summary, S&P USA opposes the proposed AHAM Kitchen Range Hood Directory. Thank you for the opportunity to provide this feedback and please feel free to reach out to me with any other questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Matt Matheny". The signature is written in a cursive, flowing style.

Matt Matheny
Residential Product Manager
S&P USA Ventilation Systems, LLC



6393 Powers Avenue
Jacksonville, FL 32217
Phone: 800-961-7370
Fax: 800-961-7379
www.spvg-northamerica.com