

DOCKETED

Docket Number:	19-BSTD-10
Project Title:	AHAM Kitchen Range Hood Directory Approval
TN #:	232076
Document Title:	Sub Zero Group, Inc comments on AHAM Range Hood Directory Approval
Description:	N/A
Filer:	System
Organization:	Sub Zero Group, Inc
Submitter Role:	Public
Submission Date:	2/18/2020 1:16:24 PM
Docketed Date:	2/18/2020

Comment Received From: Sub Zero Group, Inc
Submitted On: 2/18/2020
Docket Number: 19-BSTD-10

Sub Zero Group, Inc comments on AHAM Range Hood Directory Approval

Additional submitted attachment is included below.



SUB-ZERO GROUP, INC.

4717 Hammersley Road, Madison WI 53711-2798
P: 800.532.7820 P: 608.271.2233

February 17th, 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 Kitchen Range Hood Directory Approval

Dear Mr. Strait,

Sub Zero Group, Inc. (SZG) respectfully submits the following comments to the California Energy Commission (CEC) regarding Kitchen Range Hood Directory Approval.

SZG is a family-owned company that has been headquartered in Madison, Wisconsin for 75 years. SZG developed the niche market for customized Built-In refrigerators, freezers and wine storage products. We then added the Wolf brand of high performance cooking appliances, which includes a line of Ventilation models, in 2000 and we most recently launched the Cove branded dishwasher product in 2018. SZG's manufacturing sites are located in Wisconsin and Arizona and all products are distributed into the California market via Riggs Distributing, Inc., located in Burlingame, CA, and Sub Zero Group West, Inc., located in Costa Mesa, CA.

We fully support and affirm the comments being submitted by the Association of Home Appliance Manufacturers (AHAM), our trade association. AHAM's conclusions and suggestions reflect the best thinking of the Association members that manufacture Range Hoods and other Ventilation products that accompany cooking appliances for the purpose of indoor air quality.

Specifically, we support AHAM's application for an equivalent alternate directory to demonstrate compliance with Part 6. We believe it is important to provide manufacturers with an alternative source for certification and testing to eliminate the monopoly that exists today. We believe that our industry and the consumers of California will benefit by qualifying a separate, yet equivalent, approvals channel. Widening the approvals channel opens the capacity for manufacturers to qualify and place on the market more efficient products.





SUB-ZERO GROUP, INC.

4717 Hammersley Road, Madison WI 53711-2798
P: 800.532.7820 P: 608.271.2233

The AHAM Program and Directory has been demonstrated to be in compliance with American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) ventilation standards and will provide accurate performance data to consumers and other interested parties. In short, it is an equivalent approvals standard to that of HVI and we feel strongly that the CEC should recognize that for the benefit of manufacturers and California consumers.

In closing, SZG, as always, is open to further discussion to share our experience and the validity of our support for the AHAM Program and Directory that allows for an equivalent, and much needed, alternative.

Respectfully submitted,

Christopher M. Jessup
Director of Quality & Regulatory Compliance, Sub Zero Group, Inc.

Cc: Randall Cooper, Vice President, Technical Operations & Standards, AHAM
Jared Wells, Design Engineering Laboratory Manager, Sub Zero Group, Inc.