

DOCKETED

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HVI response to Docket ID 18-BSTD-03 (Jeff Ruth)

Dear CEC Staff,

We are writing in response to the letter submitted by Mr. Jeff Ruth and docketed as 19-BSTD-03. In his letter, Mr. Ruth proposed that field verification of range hood flow rate and sound performance be permitted as an alternative to the current CEC requirements for HVI certification of these products.

HVI believes that product certification and field verification are complementary and that ventilation product certification should continue to be required by Title 24 without exception for the following reasons:

1. Since 2008, HVI certification has been required by CEC for ventilation products. Manufacturers and builders have had 12 years to comply. With the 2019 version of Title 24, CEC introduced an additional requirement for field verification of this parameter. Raters like Mr. Ruth are on the front lines of verification and enforcement, and the industry is grateful for their work in this area. Lack of compliance is not a good reason to roll back a code requirement, but it does point to the need to educate builders. HVI would be happy to assist CEC with development of materials in this regard.
2. There are currently 1,424 range hood models listed in the HVI Certified Products Directory, providing many options for builders.
3. As recognized by CEC, field verification of range hood performance is complementary to product certification. Both play key roles in ensuring that ventilation products will meet Title 24's requirements at each linkage of the design-specification-installation chain.
4. HVI certification of range hoods provides the following value:
 - a. Consumer protection and confidence that products will achieve advertised values under the same conditions. Test results have shown that products that are not certified can perform well below advertised values. HVI's certification testing includes quality control measures for verification of product ratings through random sampling as well as through targeted 3rd party challenges.
 - b. Consistent product quality. Products that are subjected to rigorous certification and verification testing must maintain their performance or be de-listed from the Certified Products Database.
 - c. Trusted ratings that act as a cornerstone of good design and confident specification.

To better assist specifiers with system design, HVI has recently developed a new metric, "Nominal Installed Airflow", which provides a closer approximation to the actual airflow rate of a range hood that can be expected when installed in a typical duct system. California's CASE team has proposed to reference this metric to demonstrate compliance with new range hood performance requirements proposed for Title 24-2022.

d. Verification of performance parameters that are especially challenging to confirm through field testing. Parameters such as sound, range hood capture efficiency, power consumption, and even airflow can be very challenging to confirm in the field with a reasonable level of confidence, where there is great variation in interfering testing conditions and in instrument accuracy. When certifying products, testing is conducted with high-accuracy, calibrated instruments in a controlled laboratory environment; this method provides repeatable results that are much more accurate and reliable than field measurements.

While certification of range hoods provides critical support to design and specification of ventilation systems, HVI recognizes that field verification provides the valuable service of ensuring that certified products have been installed and that the installation achieves the targeted design flow rate. We thank raters for their work in this regard, and we will continue to support the industry by certifying quality products that can be specified with confidence.

Kind regards,
Jacki Donner, CEO
Home Ventilating Institute (HVI)