

<b>DOCKETED</b>	
<b>Docket Number:</b>	22-AAER-04
<b>Project Title:</b>	2022 Amendments to the Appliance Efficiency Regulations
<b>TN #:</b>	253925
<b>Document Title:</b>	Jacob - AHAM comments Title 20 Proposed Amendments
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Jacob
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	1/17/2024 9:23:50 AM
<b>Docketed Date:</b>	1/17/2024

*Comment Received From: Jacob  
Submitted On: 1/17/2024  
Docket Number: 22-AAER-04*

**AHAM comments Title 20 Proposed Amendments**

*Additional submitted attachment is included below.*

January 17, 2024

Submitted via Docket #22-AAER-04

Commissioner Andrew McAllister  
California Energy Commission  
Docket Unit, MS-4  
Re: Docket No. 22-AAER-04  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: Docket #22-AAER-04 – *Proposed 2022 Amendments to the Appliance Efficiency Regulations*

Dear Commissioner McAllister:

The Association of Home Appliance Manufacturers (AHAM) would like to comment on the Proposed Regulatory Language for the Amendments to Title 20 Appliance Efficiency Regulations (Docket 22-AAER-04).

AHAM commends the CEC for making the effort to harmonize energy efficiency standards with the Department of Energy (DOE) to the greatest extent possible. After reviewing the proposed amendments, AHAM suggests a few revisions to the proposals to ensure harmonization and keep burden to a minimum. These are detailed below.

As an overarching recommendation, AHAM continues to urge the CEC to extend its references of the federal regulations to definitions in Section 1601 – 1609 to ensure continuity and clarity. AHAM appreciates and agrees with CEC's updated testing methods for home appliances citing federal regulations, i.e., Appendices to 10 C.F.R. subpart B of part 430. Each of these appendices also include definitions applicable to the tested product and are the exact same definitions. Instead of updating definitions one by one under Section 1601, referencing federal regulations would automatically update them when the DOE changes definitions.

With regard to the product-specific sections of the proposed amendments, AHAM provides the following feedback:

**1. Proposed Regulatory Language for Title 20 Update**

Section 1604 Test Methods for Specific Appliances (r) Cooking Products and Food Service Equipment. Table R-1 "Cooking Products and Food Service Equipment Test Methods" appears to reference an outdated test procedure for commercial cooktop efficiency. The latest version is ASTM F1521-12R18. CEC should revise its reference to this latest version.

2. **Initial Statement of Reasons for the Title 20 Update**

Section 1604 Test Methods for Specific Appliances. **1604(p)(1)**: proposes to update its references to the test procedures for clothes washers. The proposal is to amend the language as follows:

**1604(p)(1)**:

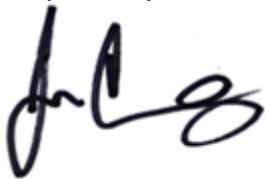
For clothes washers that are consumer products, these are changes to update the text to reflect the federal test methods and to add subsections (1)(A) and (1)(B) to clarify the effective dates of each test method. The test methods are “10 C.F.R. section 430.23(j) (Appendix J to subpart B of part 430)” and “10 C.F.R. section 430.23(j) (Appendix J2 to subpart B of part 430)”. These changes are necessary to align with current federal law.

To align with current federal law and avoid federal preemption under EPCA, the CEC should clarify that the clothes washers test procedure implementation date is aligned with the DOE timeline and that the test procedure will not be required by California prior to the federal test procedure implementation date. AHAM anticipates that the DOE will adopt a compliance date for test procedures in Appendix J in 2028. CEC must not require compliance with the revised Federal test procedures prior to DOE requiring its use. To do so would violate the Energy Policy and Conservation Act of 1975, as amended (EPCA) requirement that representations be made according to the required test procedure. We assume that CEC does not intend to require earlier use of the amended clothes washer test procedures than DOE, but wanted to be clear on that point in these comments.

AHAM agrees that the reporting requirements for commercial and residential clothes washers should be as common as possible. CEC should only require corrected remaining moisture content (RMC) to be reported. Corrected RMC is what is used to calculate IMEF for residential clothes washers and to calculate MEF for commercial clothes washers and is thus the relevant metric to use to confirm claims. Uncorrected RMC is not relevant for any other purpose relevant to CEC and providing additional information not required by DOE should be minimized so as to reduce reporting burden.

AHAM appreciates the opportunity to comment on the proposed language amendments to the Appliance Efficiency Regulations and is glad to discuss these matters further with the Commission.

Respectfully submitted,



Jacob Cassady  
Director, Government Relations

**About AHAM:** AHAM represents more than 160 member companies that manufacture 90% of the major, portable and floor care appliances shipped for sale in the U.S. Home appliances are the heart of the home, and AHAM members provide safe, innovative, sustainable and efficient products that enhance consumers' lives. The home appliance industry is a significant segment of the economy, measured by the contributions of home appliance manufacturers, wholesalers, and retailers to the U.S. economy. In all, the industry drives nearly \$200 billion in economic output throughout the U.S. and manufactures products with a factory shipment value of more than \$50 billion. In California, the home appliance industry is a significant and critical segment of the economy. The total economic impact of the home appliance industry to California is \$15.9 billion, more than 84,000 direct and indirect jobs, \$2.4 billion in state tax revenue, and more than \$5.3 billion in wages. The home appliance industry, through its products and innovation, is essential to consumer lifestyle, health, safety and convenience. Home appliances also are a success story in terms of energy efficiency and environmental protection.