

**DOCKETED**

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<b>Project Title:</b>	2022 Amendments to the Appliance Efficiency Regulations
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*Comment Received From: Hunter Fan Company  
Submitted On: 3/22/2024  
Docket Number: 22-AAER-04*

## **Hunter Fan Company Comments**

*Additional submitted attachment is included below.*



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March 22, 2024

Commissioner Andrew McAllister  
California Energy Commission  
Docket Unit, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

RE:                   Docket Number:       22-AAER-04.    TN #: 254932  
                          Project Title:         2022 Amendments to the Appliance Efficiency Regulations  
                          Document Title:      Proposed Regulatory Language for the 15-day Comment Period

Dear Commissioner McAllister,

Hunter Fan Company (“Hunter”), a leading US ceiling fan manufacturer, appreciates the opportunity to comment on the Proposed Regulatory Language for the Amendments to Title 20 Appliance Efficiency Regulations (Docket 22-AAER-04).

We commend the California Energy Commission (“CEC”) for its efforts to align with the Department of Energy (“DOE”) energy efficiency standards wherever feasible. Upon review of the proposed amendments, Hunter suggests a few revisions to ensure full harmonization with DOE standards.

### **Definition of a Ceiling Fan**

To clarify the distinction between air circulating fans and ceiling fans, the DOE updated its definition of a ceiling fan<sup>1</sup>. This distinction is crucial due to the varied mounting possibilities of air circulating fans, including ceiling installations. After collaborative efforts with the industry, a specific parameter—the ratio of fan blade span to maximum rotation rate—was chosen to differentiate these products effectively.

We urge the CEC to revise the Title 20 definition of a ceiling fan accordingly, enhancing clarity for both the industry and consumers, and facilitating straightforward compliance enforcement.

The current DOE definition, found under 10 CFR 430.2, states:

Ceiling fan means a nonportable device that is suspended from a ceiling for circulating air via the rotation of fan blades. For the purpose of this definition:

- (1) Circulating air means the discharge of air in an upward or downward direction. A ceiling fan that has a ratio of fan blade span (in inches) to maximum rotation rate (in revolutions per minute) greater than 0.06 provides circulating air.
- (2) For all other ceiling fan related definitions, see appendix U to this subpart.

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<sup>1</sup> 87 Fed. Reg. 50396 (August 17, 2022)

## Commercial and Industrial Fans and Blower Exclusions

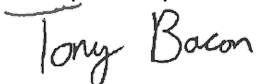
We also recommend that the CEC maintain the exclusion of ceiling fans from the commercial and industrial fans and blowers section to prevent confusion. The proposed amendments (shown below) suggest removing this clarification, which could lead to misunderstandings about the applicability of these standards to ceiling fans, which are separately regulated by the CEC. This confusion often extends to consumers, who may erroneously seek compliance evidence from manufacturers. Explicit exclusion, as practiced by the DOE, eliminates such misunderstandings for all parties involved.

- (1) Commercial and industrial fans and blowers do not include:
  - (A) a radial housed unshrouded fan with blade diameter at tip less than 30 inches or a blade width of less than 3 inches; safety fans as defined in Section 1602(d) of this Article;
  - (B) a safety fan; ceiling fans as defined in 10 CFR 430.2;

## Conclusion

Hunter Fan Company values the opportunity to provide feedback on these amendments. We look forward to further engagement with the Commission as it finalizes the appliance efficiency regulations in Title 20.

Respectfully Submitted,



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