

DOCKETED

Docket Number:	17-BSTD-02
Project Title:	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
TN #:	222857
Document Title:	HVI Comments for 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
Description:	N/A
Filer:	System
Organization:	Home Ventilating Institute (HVI)/John Rose
Submitter Role:	Public Agency
Submission Date:	3/5/2018 1:41:35 PM
Docketed Date:	3/5/2018

Comment Received From: John Rose

Submitted On: 3/5/2018

Docket Number: 17-BSTD-02

Docket No. 17-BSTD-02 for 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking

Re: Docket No. 17-BSTD-02 for 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking

Dear Commissioner McAllister:

The Home Ventilating Institute (HVI) would like to comment on the 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking (Docket 17-BSTD-02).

We support the enforcement of CEC Title 24, whereby raters can use the existing, readily available ratings in the HVI-Certified Products Directory to demonstrate compliance. Clarification can be added to ensure that additional testing and re-certification is not needed for range hoods already HVI Certified for both High Speed and for the optional Working Speed. These ratings are also the basis for range hoods to qualify for ENERGY STAR.

HVI understands that the enforcement of CEC Title 24 is intended to utilize the product ratings currently in the HVI CPD since:

1. The cost of additional testing was not considered prior to issuing the draft.

2. Product availability would be seriously reduced if the interpretation does not align with common rating practices specific to range hoods, which have been vetted, and are included in programs such as ENERGY STAR.

3. The estimated timeline for retesting would extend over multiple years and slow the adoption of the Capture Efficiency program. HVI Capture Efficiency Rating program is being developed and will require retesting of range hoods soon.

HVI will continue to work with the ASHRAE 62.2 SSPC, seeking to align ratings references across product categories.

HVI requests that CEC amend references in the proposed language 150.0(o)2B to ensure that raters can verify that 1.) the installation is suitable for the range hood's airflow capacity, and 2.) the sound rating is sufficiently quiet to comply with CEC and ASHRAE requirements. We acknowledge that these two requirements may be fulfilled with two separate rating points (speed settings). HVI respectfully offers a suggestion for each point that utilizes the rating points that are readily available in the HVI Certified Products Directory.

Airflow Rating. HVI seeks an amended reference in 150.0(o)2B for the exception found in ASHRAE 62.2 Section 5.4 to address range hoods. Every HVI-Certified range hood is rated at High Speed, at 0.1 in. w.g., and this rating point is adequate to prove compliance to the minimum airflow recommended by ASHRAE 62.2. The Prescriptive Duct Sizing table 5.3 in ASHRAE 62.2 does not cover most range hoods' high-speed airflows, as it only extends to 300 CFM. In absence of a table that can be referenced for any potential range hood, please consider an Airflow Measurement exception specific to range hoods.

An amended reference to Section 5.4 of ASHRAE 62.2, where Table 5.3 is not referenced, could clarify the exception to field measurement such that the airflow rating for Kitchen Range Hoods, according to Section 7.1, at high speed at a pressure of 0.1 in. wc (25 Pa) may be used, provided the duct sizing is 6 in. diameter or larger and meets the manufacturer's design criteria.

Sound Rating. HVI would like to point out that the definition of HVI's Working Speed rating ensures a minimum airflow, so products meeting the requirement for sound at Working Speed would also have an associated airflow rating. It is therefore not necessary to address airflow in the reference to minimum sound requirements.

An amended reference to Section 7.2 of ASHRAE 62.2 could clarify that Kitchen Range Hoods may be rated for sound at a static pressure determined at working speed as specified in HVI Publications.

We appreciate the opportunity to comment on this matter and look forward to working with the CEC.

Sincerely,

John Rose
Quality Assurance Director
Home Ventilating Institute

Additional submitted attachment is included below.



March 5, 2018

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5076

docket@energy.ca.gov

Re: Docket No. 17-BSTD-02 for 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking

Dear Commissioner McAllister:

The Home Ventilating Institute (HVI) would like to comment on the 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking (Docket 17-BSTD-02).

We support the enforcement of CEC Title 24, whereby raters can use the existing, readily available ratings in the HVI-Certified Products Directory to demonstrate compliance. Clarification can be added to ensure that additional testing and re-certification is not needed for range hoods already HVI Certified for both High Speed and for the optional Working Speed. These ratings are also the basis for range hoods to qualify for ENERGY STAR.

HVI understands that the enforcement of CEC Title 24 is intended to utilize the product ratings currently in the HVI CPD since:

- The cost of additional testing was not considered prior to issuing the draft.
- Product availability would be seriously reduced if the interpretation does not align with common rating practices specific to range hoods, which have been vetted, and are included in programs such as ENERGY STAR.
- The estimated timeline for retesting would extend over multiple years and slow the adoption of the Capture Efficiency program. HVI Capture Efficiency Rating program is being developed and will require retesting of range hoods soon.

HVI will continue to work with the ASHRAE 62.2 SSPC, seeking to align ratings references across product categories.

HVI requests that CEC amend references in the proposed language 150.0(o)2B to ensure that raters can verify that 1.) the installation is suitable for the range hood's airflow capacity, and 2.) the sound rating is sufficiently quiet to comply with CEC and ASHRAE requirements. We acknowledge that these two requirements may be fulfilled with two separate rating points (speed settings). HVI respectfully offers a suggestion for each point that utilizes the rating points that are readily available in the HVI Certified Products Directory.

Advancing the Value of Residential Ventilation for Healthier Living®

Tel: 855.HVI.VENT • Fax: 480.559.9722 • www.hvi.org

Airflow Rating. HVI seeks an amended reference in 150.0(o)2B for the exception found in ASHRAE 62.2 Section 5.4 to address range hoods. Every HVI-Certified range hood is rated at High Speed, at 0.1" w.g., and this rating point is adequate to prove compliance to the minimum airflow recommended by ASHRAE 62.2. The Prescriptive Duct Sizing table 5.3 in ASHRAE 62.2 does not cover most range hoods' high-speed airflows, as it only extends to 300 CFM. In absence of a table that can be referenced for any potential range hood, please consider an Airflow Measurement exception specific to range hoods.

An amended reference to Section 5.4 of ASHRAE 62.2, where Table 5.3 is not referenced, could clarify the exception to field measurement such that **the airflow rating for Kitchen Range Hoods, according to Section 7.1, at high speed at a pressure of 0.1 in. wc (25 Pa) may be used, provided the duct sizing is 6" diameter or larger and meets the manufacturer's design criteria.**

Sound Rating. HVI would like to point out that the definition of HVI's Working Speed rating ensures a minimum airflow, so products meeting the requirement for sound at Working Speed would also have an associated airflow rating. It is therefore not necessary to address airflow in the reference to minimum sound requirements.

An amended reference to Section 7.2 of ASHRAE 62.2 could clarify that **Kitchen Range Hoods may be rated for sound at a static pressure determined at working speed as specified in HVI Publications.**

We appreciate the opportunity to comment on this matter and look forward to working with the CEC.

Sincerely,

John Rose
Quality Assurance Director
Home Ventilating Institute