

## DOCKETED

<b>Docket Number:</b>	17-BSTD-02
<b>Project Title:</b>	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
<b>TN #:</b>	222860
<b>Document Title:</b>	AHAM Comments 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
<b>Description:</b>	Letter that was attached to email cover sheet
<b>Filer:</b>	System
<b>Organization:</b>	AHAM
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	3/5/2018 2:40:55 PM
<b>Docketed Date:</b>	3/5/2018

*Comment Received From: AHAM*

*Submitted On: 3/5/2018*

*Docket Number: 17-BSTD-02*

**2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking**

*Additional submitted attachment is included below.*



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March 5, 2018

Via Email

California Energy Commission  
Docket Unit, MS-4  
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Re: Docket No. 17-BSTD-02 for 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking

Dear Commissioner McAllister:

The Association of Home Appliance Manufacturers (AHAM) would like to comment on the 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking (Docket 17-BSTD-02). We have concerns with the building codes as they relate to ventilating hoods.

California has proposed changes to the Title 24 Energy Code to reference the ASHRAE 62.2 Building Code for Residential Buildings. Today, there are three different airflow conditions (ASHRAE, HVI & ENERGY STAR) in various certifications of a range hood. These different airflow test conditions create undue burden for the manufacturer, suppliers, and home builders. Until this discrepancy is resolved between HVI and ASHRAE, the HVI data is not usable for verification actions. Without the HVI program, the verification process fails and the system will not meet its objective.

The Industry is already in discussions on harmonizing HVI, ASHRAE, and ENERGY STAR test conditions to minimize burden and representative actual use conditions. AHAM recommends CEC provide additional time to resolve this matter.

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

Sincerely,

Kevin Messner  
Sr. VP, Policy & Government Relations  
AHAM