

DOCKETED

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For 2019 Title 24, Part 6

Additional submitted attachment is included below.



March 5, 2018

Via Email

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5076
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Re: Docket No. 17-BSTD-02 for 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking

Dear Commissioner McAllister,

Whirlpool Corporation appreciates the opportunity to comment on the 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking.

Whirlpool Corporation is the world's leading major home appliance company, with approximately \$21 billion in annual sales, 92,000 employees and 70 manufacturing and technology research centers in 2017. The company markets *Whirlpool*, *KitchenAid*, *Maytag*, *Consul*, *Brastemp*, *Amana*, *Bauknecht*, *Jenn-Air*, *Indesit* and other major brand names in nearly every country throughout the world.

Kitchen Range Hoods

Whirlpool appreciates the Energy Commission's efforts to address manufacturer concerns regarding airflow and sound requirements for kitchen range hoods. However, despite the proposed changes, Whirlpool remains concerned that the proposed language would result in significant challenges for consumers, builders, manufacturers and inspectors.

Variations in airflow test conditions between ASHRAE 62.2, HVI and ENERGY STAR® (see *Figure 1* below) have created significant challenges and inefficiencies in defining the performance conditions for kitchen range hoods. Before the Energy Commission proceeds with changes to requirements for ventilation hoods, it is critical for HVI and ASHRAE to resolve these variations to ensure a functional verification process and to avoid complexity and unnecessary costs for businesses and consumers.

We also bring to the Commission's attention that the HVI directory does not contain ventilation hood ratings at the 0.25" w.c. As a result, consumers, builders and inspectors would not have available data from which to verify the performance of tested kitchen range hoods.



G. Kitchen range hoods shall be rated for flow in accordance with Section 5.4 of ASHRAE 62.2. EXCEPTION to Section 150.0(o)1G: The airflow at 0.25" w.c. as derived from the manufacturer's HVI test report may be used, provided the ducts are sized using Table 5.3 of ASHRAE 62.2 or manufacturer's design criteria to provide at least the airflow required in Section 5 of ASHRAE 62.2.

Conclusion

Whirlpool supports the Commission's efforts to align with an industry standard and reference the HVI certification for ventilation as provided in RA3.7.4.3. Unfortunately, since the HVI certification is not aligned with the ASHRAE 62.2, this discrepancy must be resolved before implementation of this proposal should occur. Whirlpool strongly urges the CEC provide additional time to resolve this matter before implementing it in code. The Industry is currently in discussions with HVI, ASHRAE, and ENERGY STAR on how to harmonize the test conditions and eliminate variation.

We appreciate the opportunity to comment on this proposal and welcomes further engage on this topic.

Sincerely,

Eva Greene
Government Relations Analyst
Whirlpool Corporation

Figure 1: Test Condition Differences

Test Condition Differences

Organization	Current		Proposed	
	Airflow = 100 cfm @ _____ in. w.g.	Sound measured @ _____ in. w.g.	Airflow = 100 cfm @ _____ in. w.g.	Sound measured @ _____ in. w.g.
ASHRAE	0.25	0.1	0.25	0.1
HVI "HS" +	0.1	0.1	0.1	0.1
HVI "LS"	0.1	0.1	0.1	0.1
HVI "WS"	0.03	0.03	0.03	0.03
CEC	0.25 *	0.1 *	0.03	0.03
EStar	0.03	0.03	0.1	0.1

+ Required for HVI certification * References ASHRAE