

DOCKETED

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Comment Received From: Kevin Messner

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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)

Additional submitted attachment is included below.



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May 7, 2018

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

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 kitchen range hoods.

California has proposed changes to the Title 24 Energy Code related to kitchen range hoods and we appreciate CEC's attempt to address the problems that exist in the current building standards. The changes are improvements, but the significant problems still remain. First and most significantly, the current version creates a monopoly for one specific certification organization. That has a whole host of problems and concerns. We recommend the below changes to Section 150.0 to address this matter.

B Kitchen Range Hoods. The installed kitchen range hood shall be field verified in accordance with the procedures in Reference Residential Appendix RA3.7.4.3 to confirm the model is rated ~~by HVI~~ to comply with the following requirements:

- i. The minimum ventilation airflow rate as specified in Section 5 of ASHRAE 62.2 ~~when tested in accordance with HVI 916~~

Today, there are three different airflow specifications in various certifications (ASHRAE, HVI & ENERGY STAR) for range hoods. These different airflow test conditions create an undue burden for manufacturers, suppliers, and home builders. This burden partially can be resolved with the changes to Section 150.0 recommended below. This change would resolve uncertainty in test conditions and procedures, and would not affect performance in the field. The reasons for this is because test conditions for Low Speed (or even Medium Speed) is more stringent than for Working Speed and if it meets the requirements for CFM and Sones, it would be transparent to the user. The CFM would still be above 100 cfm and the sound would still be below 3 sones.

G. Kitchen range hoods shall be rated for sound in accordance with Section 7.2 of ASHRAE 62.2.

EXCEPTION to Section 150.0(o)1G: Kitchen range hoods may be rated for sound at **any speed that delivers 100 cfm or greater** ~~a static pressure determined at working speed as specified in HVI 916-section 7.2.~~

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