

DOCKETED

Docket Number:	19-BSTD-10
Project Title:	AHAM Kitchen Range Hood Directory Approval
TN #:	230499
Document Title:	AHAM Part 6 Alt Procedure Application
Description:	This document is an application by the Association of Home Appliance Manufacturers under Title 24, Part 1, Section 10-109(h) for consideration of their directory program as an equivalent alternative to a directory program required in Title 24 Part 6.
Filer:	Peter Strait
Organization:	California Energy Commission
Submitter Role:	Commission Staff
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October 1, 2019

Mr. Peter Strait
Supervisor, Building Standards Office
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

via Email: peter.strait@energy.ca.gov

Re: Application for Authorization for Alternative Procedure to Demonstrate Compliance with Part 6

Dear Mr. Strait,

As part of a new industry certification program, the Association of Home Appliance Manufacturers (AHAM) provides the following application for an alternative Kitchen Range Hood Directory in order for manufacturers to meet the requirements of Title 24 as stated in the 2019 Compliance Manual. In this application, we have provided supplemental supporting information to show that the same quality and utility will be present in the AHAM program that is currently in the HVI program.

AHAM is a trade association representing manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience.

The AHAM Verifide® mark has become recognized around the world as a way to inform consumers that an appliance has been independently tested by experts for air flow and other characteristics. AHAM offers its members a pathway to contribute directly to the development of range hood standards and policies. AHAM is an ANSI-accredited standards development organization and is a well-established leader in the development of North American and international standards for appliances. AHAM has authored numerous appliance performance testing standards used by manufacturers, consumer organizations, and governmental bodies to rate and compare appliances.

Request:

AHAM has developed a certification program for range hoods that includes a product listing directory. We seek CEC's approval before the end of year of the AHAM Verifide® Directory based on the supporting Certification Program as an acceptable option for a directory for kitchen range hoods. The documents in the appendix explain the AHAM program and demonstrate its equivalence to the HVI ratings system.

Rationale:

The 2019 CEC Energy Efficiency Standard, Title 24, updated the 2019 CEC Compliance Manual with a requirement that kitchen range hoods be listed in a publically available directory so they could be verified by a HERS rater. Only one directory (HVI) for kitchen range hoods currently exists. In response to our member requests for an alternative program, AHAM has created a certification program and directory for range hoods just as we have in other appliance categories. The burden and cost to comply with the Title 24 requirements is significant because of the required upfront certification testing, verification, and directory listing costs. Having an alternative directory and certification source will increase competition and reduce the compliance cost for range hood manufacturers without detracting from CEC enforcement requirements. This will benefit everyone.

The documentation provided shows that AHAM's program, as defined, will assure consistency of testing and information provided and will not weaken the effectiveness of California requirements by having an alternate directory. Please see the appendix for the following information that demonstrates no effective difference between AHAM's program and HVI's program:

- A1. The Procedural Guide for the AHAM program. This is equivalent to HVI 920 and the appendix shows the mapping of HVI 920 to the AHAM Procedural Guide assuring the equivalency. The AHAM program is available to members and non-members.
- A2. AHAM HRH-2-2019. This is the test procedure document and is fully based on the requirements of AHSRAE 62.2 clauses 7.1 and 7.2.
- A3. The on-line directory that is equivalent to the HVI database.
- A4. Supplemental information about AHAM and the AHAM program.
- A5. Expected changes to the 2019 Compliance Manual to add AHAM as an alternate.

AHAM's intention is to create and maintain an alternative option that ensures consistency in the information CEC and consumers receive regardless of the program the manufacturer chooses. We will provide the directory to participants at a modest cost. Any future changes that we may propose to make will be reviewed and approved by any regulator using the directory to maintain their acceptance and continued use.

Sincerely,



Kevin Messner

Sr. VP, Policy & Government Relations

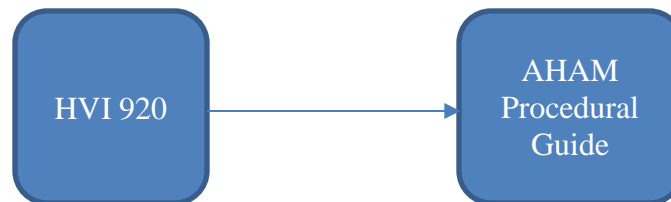


Randy Cooper

VP, Technical Operations and Standards

Appendix

A1. The Procedural Guide (PG) for the AHAM program which provides a uniform and commercially practical certification and verification of manufacturers' CFM & Sound ratings, This is equivalent in scope and tolerances to HVI 920. The AHAM PG references the HVI 920 document. This program is available to members and non-members.



[Embedded file removed and posted separately as *Range Hood Certification Program Procedural Guide*]

Attached are documents that map the requirements in HVI 920 to the AHAM Procedural Guide showing that all applicable sections of HVI 920 for range hoods are covered under the AHAM program.

- Green highlight shows equivalency
- Gray highlight means not applicable to AHAM range hood program or where differences exist that are enough different that they need explanation to show equivalency/acceptability.

[Embedded file removed and docketed separately as *Comparison Map*.]

To further explain what is meant by equivalent and to provide a summary of the maps in the areas that may be of interest to a public reviewer. The following spreadsheet is attached.

[Embedded file removed and docketed separately as *Comparison Narrative*.]

A2. AHAM HRH-2-2019. This is the test procedure document and is fully based on the requirements of AHSRAE 62.2 clauses 7.1 and 7.2 and the Energy Star requirements



[Embedded file removed and docketed separately as *Household Range Hoods Standard*.]

A3. The on-line directory that is equivalent to the HVI database. It captures the same information in the same visual format so that consumers or HERS raters will be able to quickly compare information between directories.

Directory Fields -

- Product
- Product SubCategory
- Brand Owner
- Brand Name
- Model
- Ducting
- Discharge
- Speed
- SP (Static Pressure)
- Rated Airflow
- Rated Sound
- Input Power
- Energy Star

Link to AHAM Directory

http://www.aham.org/AHAM/What_We_Do/Kitchen_Range_Hood_Certification

Comparison:

<https://www.hvi.org/hvi-certified-products-directory/>

A4. Supplemental information about the AHAM & the AHAM program.

- AHAM Verifide™ - Over 30 years of experience of certification and verification.
 - Air cleaner program is recognized globally.
 - Other products: Refrigerators, Clothes Washers, Dryers, Room AC, Dehumidifiers, Dishwashers.
- EPA - AHAM is recognized as an Administration Body by the EPA for ENERGY STAR.
- DOE - AHAM has a Letter of Reliance with DOE.

[Embedded file removed and docketed separately as *DOE Letter of Reliance.*]

- AHAM is using Intertek-Cortland for verification testing.
 - This lab is accepted by both CEC, EPA and SCC in Canada for ventilation fan testing.

[Embedded file removed and docketed separately as *CEC Test Laboratory Approval.*]

[Embedded file removed and docketed separately as *EPA Test Laboratory Recognition.*]

A5. Expected changes to the 2019 Compliance Manual to add AHAM as an alternate

- 2.5.1.x (Kitchen hood HVI listing)
- 4.6.0.6 (The new verification protocol requires comparing the installed model to ratings in the Home Ventilating Institute (HVI) directory of certified ventilation products to confirm the installed range hood)
- 4.6.1 (HVI ratings for kitchen range hood fans)
- 4.6.1.2.1 For kitchen exhaust ventilation systems...6 (Kitchen exhaust system HVI certification number)
- 4.6.1.2.2 (For kitchen exhaust ventilation systems - Confirmation the installed system is rated by HVI to meet the required airflow and sound requirements)
- 4.6.1.2.3 (For kitchen exhaust ventilation systems - • Confirmation the installed system is rated by HVI to meet the required airflow and sound requirements)
- 4.6.6.2 (the actual airflow rate and fan watt draw of the fan must be input. Values for airflow and fan W/CFM information may be available from the HVI directory at the following URL.. https://www.hvi.org/proddirectory/CPD_Reports/section_1/index.cfm If HVI does not list fan energy for the installed model, use information from the manufacturer's published documentation.)
- 4.6.7.1.B (The 2019 Title 24 Part 6 standards require verification that range hoods are HVI-certified to provide at least one speed setting at which they can deliver at least 100 CFM at a noise level of 3 sones or less.)
- HVI listings are available at:
https://www.hvi.org/proddirectory/CPD_Reports/section_1/index.cfm
- 4.6.9.1 (When selecting fans for use in meeting the requirements of the standard, you must check the Home Ventilating Institute (HVI) Certified Products Directory to confirm that the equipment you select has been tested and the rated performance meets the requirements. The *HVI Certified Products Directory* can be viewed at the following URL: <http://www.hvi.org/proddirectory/index.cfm>.)
- 4.6.9.3 (The airflow rating of a fan is available from the Home Ventilating Institute (HVI) Certified Products Directory at the HVI website (www.hvi.org).)