

DOCKETED

Docket Number:	19-BSTD-10
Project Title:	AHAM Kitchen Range Hood Directory Approval
TN #:	231741
Document Title:	AHAM Revised Application
Description:	This document is AHAM's revised application for approval of its kitchen range hood directory and program as an equivalent, alternate method of demonstrating compliance with associated ventilation requirements.
Filer:	Peter Strait
Organization:	California Energy Commission
Submitter Role:	Commission Staff
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1111 19th Street NW > Suite 402 > Washington, DC 20036
t 202.872.5955 f 202.872.9354 www.aham.org

January 24, 2020

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 - Amended

Dear Mr. Strait,

AHAM is updating our application to make crystal clear our program is equivalent to the current HVI program. We request CEC approve our amended application to end the unfair monopoly that exists. This testing situation is in a crisis. The current backlog in testing is still at least four months to the initial test.

The text below was submitted in August of 2019 as part of AHAM's original application and any changes for today are noted in [blue](#).

As part of a new industry certification program, the Association of Home Appliance Manufacturers (AHAM) provides the following application for an alternative Residential 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 of the AHAM Verifide® Directory based on the supporting Certification Program as an acceptable option for a directory for residential 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 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, improve efficiencies, and reduce the compliance cost for range hood manufacturers without detracting from CEC enforcement requirements.

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 equivalency of AHAM's program and HVI's program:

- A1. [Residential Kitchen Range Hood Certification Program Procedural Guide \(2020\), Rev 3.0](#). This is equivalent to HVI 920-2015 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. [This appendix has been updated as of January 23, 2020](#).
- A2. [AHAM HRH-2-2020, Rev 3.0](#). This is the test procedure document and is fully based on the test requirements of the [CEC Title 24 foundational requirements \(AHSRAE 62.2 clauses 7.1 & 7.2\)](#). [This appendix has been updated as of January 23, 2020](#).
- A3. The on-line directory that is equivalent to the HVI database.
- A4. Supplemental information about AHAM and the AHAM program. [This appendix has been updated as of January 23, 2020](#).
- 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.

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.

The AHAM application was updated on January 23, 2020 to clarify and address comments received during the public comment period and through discussions with CEC. However, AHAM will send a separate letter addressing all points raised by HVI in their public comments.

Manufacturers need alternatives and choices to obtain the best options for their business and the consumer. We thank CEC for considering our views and request CEC approve of our application.

Sincerely,



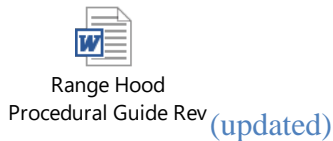
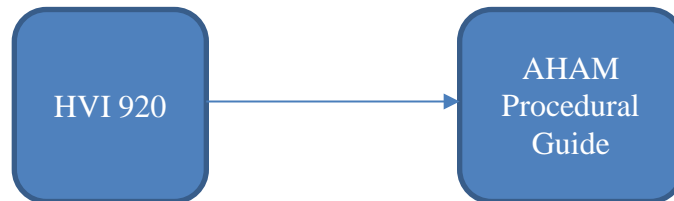
Kevin Messner
Sr. VP, Policy & Government Relations



Randy Cooper
VP, Technical Operations and Standards

Appendix

A1. Procedural Guide (PG) for the AHAM program provides a uniform and commercially practical certification and verification of manufacturers' CFM & Sound ratings. This document is titled Residential Kitchen Range Hood Certification Program Procedural Guide (2020), Version 3.0. It is equivalent in scope and tolerances to HVI 920 - 2015, HVI Product Performance Certification Procedure including Verification and Challenge, subject to the amendments specified in Appendix A, subsection 1. This program is available to members and non-members.

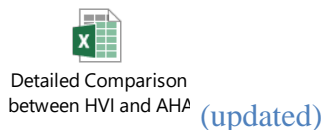


Attached are documents that map the requirements in HVI 920 to the AHAM Procedural Guide showing that all applicable sections of HVI 920 for range hoods are covered under the AHAM program. [These have been updated as of January 23.](#)

- Green highlight shows equivalency.
- Gray highlight means not applicable to AHAM range hood program or where explanation is provided to show equivalency/acceptability.



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.



The changes made since the previous posted document

- Updated Appendix A – exceptions to HVI920
- Removed first party testing
- Revised Alternate lab Appendix G

- Removed selection units from a warehouse

A2. AHAM HRH-2-2020. This is the test procedure document and is fully based on the requirements of AHSRAE 62.2 clauses 7.1 and 7.2.



AHAM HRH-2 2019
Rev 3.0 (January) (000(updated))

Air Flow:

There are no issues with the labs that AHAM will use for Air Flow. As noted below in A4, the AHAM Program Lab (Intertek) is approved for Air Flow by CEC as well is the listed Alternate test lab (REEL).

Sound:

The compliance requirement is that kitchen range hoods must be rated at a maximum of 3.0 sones at one or more airflow settings greater than or equal to 100 CFM.

- The Riverside Energy Efficiency Laboratory (REEL) is the primary lab used by HVI for certification in sound. Numerous manufacturers that would use the AHAM program have data from this lab.
- The Intertek Cortland lab is an accredited lab to ANSI/AMCA 300, as required under ASHRAE 62.2, and will add accreditation to HVI 915 through A2LA.
 - In the attached sound comparison, AHAM has shown that the sound testing at Intertek compared to the exact same models tested at REEL is within the tolerance of the standard. Multiple units were tested multiple times and at different speeds that will be used in the directory. This is the typical equivalency assessment from a conformity assessment standpoint especially if a lab is accredited. The results exhibit that the repeated demonstration of equivalency is achieved.



Sound Comparison
REEL versus Intertek (

AHAM will follow the requirements and allowances from HVI 915:

- For Certification, AHAM's program will use either data from a 6 microphone array or if the sones are above 1.5, the data may come from a boom microphone. (HVI 915 clause 3.3.1, 4.4.2, 4.4.3).

- For Verification, AHAM's program will use data from a boom microphone until the backlog is alleviated at REEL (HVI 915 Clause 4.4.4.1).

Changes made to the previous posted document:

- Added reference to UL923 for safety on Microwave hood combinations
- Clarified approval requirements in the preface
- Revised test language to be more explicit
- Removed reference material
- Added Document Control Table

A3. The on-line directory. The online directory 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.



DOE Letter of
Reliance (00055947).pdf

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



MAEDBS
Cortland.pdf



EPA-Recognized
Certification Bodies



Intertek IAS
Accreditation (00091

- Alternate Lab approvals – REEL



- REEL CEC approved
lab listing (00091088)



- REEL A2LA
accreditation.pdf

A5. Compliance Manual. Below are 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).)