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on 15-day 2022 Energy Code Update Rulemaking, Title 24

Additional submitted attachment is included below.



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August 3, 2021

Peter Strait
Supervisor, Building Standards Development
California Energy Commission
Docket Unit, MS-4
Docket No. 21-BSTD-01P
1516 Ninth Street
Sacramento, California 95814-5512

via Email: docket@energy.ca.gov

Re: 15-day 2022 Energy Code Update Rulemaking, Title 24

Dear Mr. Strait:

The Association of Home Appliance Manufacturers (AHAM) writes to comment on the 15-day 2022 Energy Code Update Rulemaking. AHAM represents 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 support more than one million jobs, have a \$198 billion economic impact, and produce more than 95% of the household appliances shipped for sale. In California, the home appliance industry is a significant and critical segment of the economy. The total economic impact of the home appliance industry to California is \$15.9 billion, more than 30,000 direct jobs and an additional 53,000 indirect jobs, \$2.4 billion in state tax revenue and more than \$5 billion in wages. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

Subchapters 7 & 10 – Dimming Controls

Regarding dimming controls at section 150.0(k)2F and 160.5(a)2F, CEC has modified the code to require lighting in habitable spaces, including but not limited to living rooms, dining rooms, kitchens, and bedrooms, to have readily accessible wall-mounted dimming controls that allow the lighting to be manually adjusted up and down. Wall-mounted dimmer controls for a range hood should not be required. There is no value to requiring wall-mounted controls for lights in a range hood. This is a cooking area and should be considered a workspace. In addition, only a small portion of the range hood models in the market have dimmer capability.

Moreover, imposing this requirement would deprive consumers, especially consumers who purchase internet-connected range hoods as a disability accommodation, of the utility provided by their smart phone controlled product. Compliance with Americans with Disabilities Act (ADA) Accessibility Guidelines¹ (ADAAG), created by the U.S. Access Board and issued by the U.S. Department of Justice to guide enforcement of the ADA, can be readily achieved regardless of the presence of more costly wall-installed controls.

And, while dimming range hood lighting should be a consumer selectable product option based on personal preference and affordability, it should not be required for all range hoods. We recommend that CEC exempt wall-mounted dimmer controls for kitchen exhaust fan lighting in addition to the current exceptions listed for sections 150.0(k)2F and 160.5(a)2F. CEC has provided no cost justification that the increased cost of the dimmable controls is offset by lower energy costs.

Thank you for considering these comments, and we are available at your convenience to answer any question or to discuss in more detail.

Sincerely,



Kevin Messner
Sr. Vice President, Policy & Government Relations

¹ <https://www.access-board.gov/ada/#department-of-justice-ada-standards-2010>, §308.