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April 10, 2018

Via E-Mail

Abigail Daken
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program

VentilatingFans@energystar.gov

Re: ENERGY STAR Program Requirements; Product Specification for
Residential Ventilating Fans, Eligibility Criteria, Draft Version 4.1

Dear Ms. Daken:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the Draft ENERGY STAR Product Specification for Residential Ventilating Fans, Eligibility Criteria, Version 4.1. Although this revision is presented as a minor revision to expand coverage to supply fans, there are additional changes that, for manufacturers of range hoods, are significant. We do appreciate that EPA allowed 30 days for written comments, extended the comment deadline by twenty days for AHAM, and held a stakeholder webinar, which are steps EPA does not always take for revisions it believes are minor. We respectfully request that, after EPA reviews the comments it receives it issue a second draft to allow stakeholders the opportunity to provide further feedback.

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 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. 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.

AHAM supports EPA and the Department of Energy (DOE) in their efforts to provide incentives to manufacturers, retailers, and consumers for energy efficiency improvement, as long as product performance can be maintained for the consumer. AHAM agrees that, before making changes to add requirements, EPA should have data. But we strongly oppose the proposed reporting

requirements for efficacy and sound level for range hoods. Such reporting requirements will require costly and burdensome testing beyond that already required for range hoods.

I. Reporting Requirements

EPA proposed new reporting requirements for efficacy and sound level at 0.1 in w.g. for range hoods. EPA indicated that it is interested in receiving these data in an effort to understand how products function in poor installations where static pressure measurements may be higher than is currently specified by industry test methods. In addition, EPA indicated that manufacturers may be interested in aligning conditions for the ENERGY STAR specification with those for ASHRAE 62.2 and California Energy Commission (CEC) requirements.

AHAM strongly opposes a mandatory reporting requirement for efficacy and sound level at 0.1 w.g. for range hoods. EPA indicated that it believes many range hoods are already tested for this and that this reporting requirement would not add burden, but that is not the case. Range hoods are rated at high speed at 0.1 w.g. and lower speeds are different. Sound level is tested at working speed. So, EPA’s proposal would add redundant sound testing at the higher pressure. AHAM believes that to comply with the proposed mandatory reporting requirements, two additional tests would be required for a new product, likely at or above about \$2,000 per model family. Due to the procedural requirements, existing products would also require retesting which could be up to about \$12,000 per model family. It is possible that a mandatory reporting requirement that adds this much additional cost and burden for partners will be a disincentive to seeking or continuing ENERGY STAR qualification for some range hoods.

We also note that there are currently discussions on these issues within and between ASHRAE, HVI, and CEC. Because, as shown in Table I below, test conditions already vary significantly between ASHRAE, HVI, CEC, and ENERGY STAR, test burden and cost are already high for range hoods. Adding an ENERGY STAR reporting requirement at this stage—when requirements are conflicting and discussions on whether some degree of harmonization and burden reduction is possible are ongoing—will serve only to increase burden and confusion. It would be better for EPA to allow the experts to work to align codes and standards before implementing a requirement which will likely drive retesting for other codes on the same range hoods. Accordingly, AHAM requests that EPA remove the proposed reporting requirement for range hoods from consideration in Version 4.1.

Table I: Test Condition Differences for Range Hoods

	Current		Proposed	
	Airflow = 100 cfm @ ___ in w.g.	Sound measured at ___ in w.g.	Airflow = 100 cfm @ ___ in w.g.	Sound measured at ___ in w.g.
ASHRAE	0.25	0.1	0.25	0.1
HVI High Speed +	0.1	0.1	0.1	0.1
HVI Low Speed	0.1	0.1	0.1	0.1
HVI Working Speed	0.03	0.03	0.03	0.03
CEC	0.25*	0.1*	0.03	0.03
ENERGY STAR	0.03	0.03	0.1	0.1

+ Required for HVI certification

* References ASHRAE

II. Lighting Requirements

EPA proposed to update the lighting requirements to recognize the fact that the option to ship with an ENERGY STAR certified bulb is now included in the eligibility requirements for Luminaires. EPA proposed that all newly certified residential ventilating fans that include lighting must meet the ENERGY STAR program requirements for Luminaires in effect at the time of certification of the ventilating fan.

Under the current specification for ventilating fans, if an ENERGY STAR certified bulb is included with the ventilating fan, there is no need to test it in the unit. But, because EPA is now proposing to cite the Luminaire specification, which requires testing with the lamp in the unit, the proposal could change that requirement. AHAM does not believe EPA intended to make such a change because it would significantly increase test burden for ventilating fans with no benefit. Accordingly, AHAM requests that EPA expressly state that ventilating fans, or at least range hoods, need not be tested with the lamp in the unit.

AHAM appreciates the opportunity to submit comments on the Draft ENERGY STAR Product Specification for Residential Ventilating Fans, Eligibility Criteria, Version 4.1 and would be glad to further discuss these matters should you so request.

Best Regards,

A handwritten signature in black ink that reads "Jennifer Cleary". The signature is written in a cursive, flowing style.

Jennifer Cleary
Senior Director, Regulatory Affairs