

February 10, 2020

The Honorable Frank Pallone
Chairman
U.S. House Committee on Energy and
Commerce
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Greg Walden
Ranking Member
U.S. House Committee on Energy and
Commerce
2125 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Pallone and Ranking Member Walden:

We write as advocates of energy efficiency to express support for consideration of legislation to address a DOE rulemaking on ceiling fans: the Energy Conservation Standards for Ceiling Fans published January 19, 2017 (82 Fed. Reg. 6,826). Some affected manufacturers have noted that minor elements of the rule would have an unintended consequence. We support legislation designed to remedy this unintended consequence.

The current performance metric measures airflow per watt, which does not take into account that fans of the same diameter can deliver very different airflows. Some fans delivering high airflows may need to be either slowed down or eliminated from the market. At the same time, some large-diameter fans with low airflows will be able to meet the minimum efficiency requirements even if they are very inefficient.

We recommend considering an alternative performance metric, the Fan Energy Index (FEI), which is defined in ANSI/AMCA Standard 208-2018. This ANSI/AMCA standard was published in 2018, too late for consideration for the Energy Conservation Standard. Using FEI would allow the highest-airflow fans a pathway to compliance while still requiring improvements in products that genuinely underperform.

Efficiency advocates support legislative changes to rulemakings when warranted. The proposed change delineated above would likely have little to no effect on the total energy savings from the Energy Conservation Standards, and it is unlikely to subvert the intent of the rulemaking. In this case, we think legislation is warranted and request your attention to the matter.

Please contact any of the following people to discuss this matter further:
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Sincerely,

Alliance to Save Energy
American Council for an Energy-Efficient Economy
Appliance Standards Awareness Project