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# Update and Q&A Session on U.S. Fan Regulations

Aug. 22, 2023

& Panel Discussion with:  
Aaron Gunzner, PE; Tom  
Catania; Charlie Meyers;  
and David Nowak

# Michael Ivanovich

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AMCA International  
*Webinar Moderator*

- Joined AMCA July 2011
- Coordinates advocacy in N. America, Asia, Europe, and Middle East
- Leads AMCA energy efficiency initiatives involving codes, standards and regulations
- M.Sc. Civil Engineering (Building Systems)



# Introductions & Guidelines

## Participation Guidelines:

- Audience will be muted during the webinar.
- Questions can be submitted anytime via the GoToWebinar platform and will be addressed at the end of the presentation.
- Reminder: This webinar is being recorded! The recording will be available on the Member-only section of the AMCA website within 24 hours.
- A PDF version of the PowerPoint presentation is available in the Handouts section of your control panel.
- A post-webinar evaluation will be emailed to everyone within one hour of the program conclusion. A link to the recording and Webinar slides will be provided, as well

# Q & A

## To submit questions:

- From the attendee panel on the side of the screen, select the “Questions” drop down option.
  - Type your question in the box, and please include which presenter your question is directed to.
  - Click “Send”.
- Questions will be answered at the end of the program.

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# Outline

- Advocacy Communications and Committees
  - **Handout:** Recent Member Alerts referenced in this presentation
- Existing Deadlines, As of Today
  - **Handout:** DOE Test Procedure Final Rule
  - **Handout:** CEC Title 20 Fan Regulation – Final Express Terms (language)
- DOE Extension Request for Fans
- DOE Corrections to Test Procedure
  - **Handout:** DOE corrections in Federal Register with originating AMCA letter
- DOE Rebate Program
  - **Handout:** Final implementation guidelines
- CEC Title 20 Update
- Near Future
- Questions & Answers
  - Questions We've Received Recently

Note: Due to limitation in number of handouts (5), today's slides will be posted with Webinar recording



# Advocacy Communications and Committees

- **Member Alerts**

- Sent to Air Movement Division contacts
- "Voting Reps" are critical – Sometimes, only contact (extension requests)
- Feel free to pass these around inside your company
- Do not ignore these and follow all their links
- Handout has the alerts referenced in this webinar

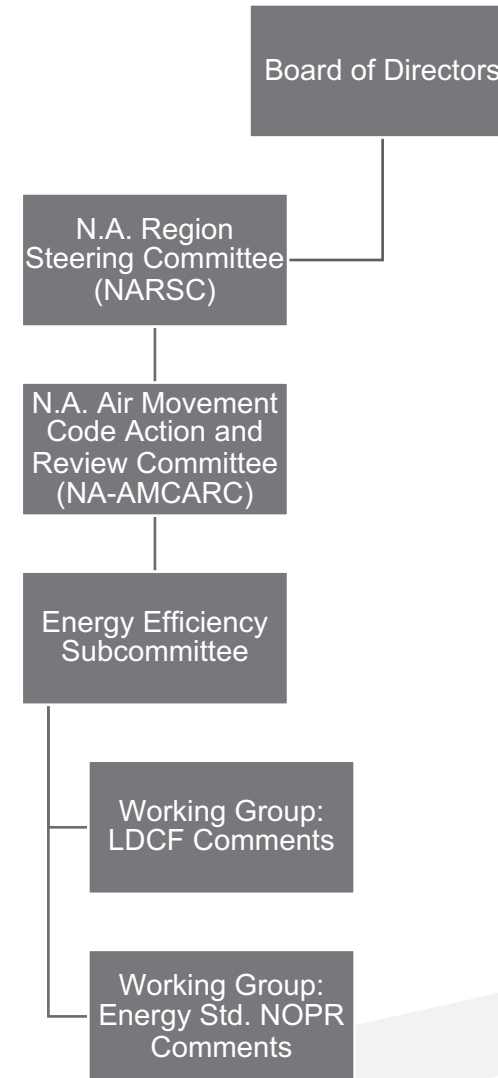


- **Member-Only Webinars**

- Registration open to AMCA members, associates, staff, consultants
- Time consuming to produce
- Will begin hosting more like today's – less content, more Q&Q

# Advocacy Communications and Committees

- **Advocacy Committees**
  - Fan Regulation Advocacy has been happening for 12 years
  - N.A. AMCARC needs “fresh blood”
  - About three to five members do most of the work
  - Fans Energy Standard will consume a TON of staff time and resources
  - Just finishing comments to Large Diameter Ceiling Fan E.S. NOPR
    - > 36 pages of comments
    - Fans E.S. might be closer to 75



# Current Regulatory Deadlines

Regulating Body	Regulation	Type of Regulation	URL For Language	Deadline & Criteria
California Energy Commission	<p>Title 20</p> <ul style="list-style-type: none"> <li>Commercial and Industrial Fans and Blowers</li> </ul>	<ul style="list-style-type: none"> <li>Test Procedure</li> <li>Energy Standard</li> <li>Compliance</li> <li>Enforcement</li> </ul>	<a href="http://EnergyCodeAce.com">EnergyCodeAce.com</a>	<p><b>November 16, 2023</b></p> <p>File Table X data in MAEDbS and affix labels on all covered products</p>
U.S. Department of Energy	<p>Appliance/Equipment Standards</p> <ul style="list-style-type: none"> <li>Fans and Blowers</li> <li>Circulating Fans that Are Not Ceiling Fans</li> </ul>	<ul style="list-style-type: none"> <li>Test Procedure</li> </ul>	<p>Code of Federal Regulations:</p> <p>Fans: CFR: <a href="#">App. A, Subpart J of Part 431—XXX</a></p> <p>Circ. Fans: <a href="#">App. B to Subpart J of Part 431—XXX</a></p>	<p><b>October 30, 2023</b></p> <p>“Voluntary” fan ratings of products covered by the test procedure need to conform to the test procedure.</p> <p>Note: Not much is mandatory</p>

# DOE Extension Request

- Per AMCA Member Alert sent Monday, Aug. 14
  - **Hard deadline of Aug. 28**
  - 180-day is maximum companies will be granted
  - Extension requests will be made public by DOE, so do not include confidential company information
  - At least 14 AMCA member companies have stated they will file extension request
  - Continue to use AMCA template and instructions
  - Send to [Jeremy.dommu@ee.doe.gov](mailto:Jeremy.dommu@ee.doe.gov)
  - Please advise Michael Ivanovich, [mivanovich@amca.org](mailto:mivanovich@amca.org) when extension filed and the result.
  - AMCA plans on using DOE extension requests for CEC “industry” extension request
  - **Extensions requests and DOE responses may be posted online**
    - **Can't say where, at this time.**

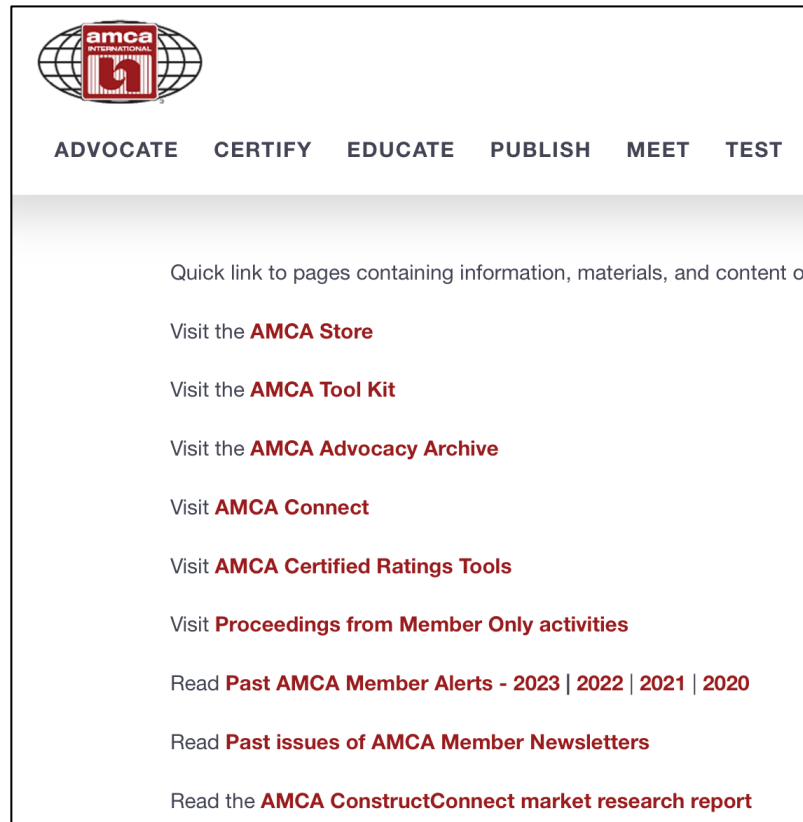
# DOE Extension Request

- If more than 180 days is needed, write something like this to make that known to DOE:

*It is my company's understanding that the Department is only permitted to grant extensions of six months, but even at that maximum extension, INSERT COMPANY NAME will need to compress as much as INSERT TOTAL MONTHS OR YEARS of workload into the six-month period of time, or be faced with some very difficult choices about which products we can continue to sell.*

# DOE Extension Request

- Template and instructions in Member Area of [www.amca.org](http://www.amca.org)
- Login using your username and password
- Click on Advocacy Archive



The screenshot shows the AMCA International logo at the top left, followed by a horizontal navigation bar with the following items: ADVOCATE, CERTIFY, EDUCATE, PUBLISH, MEET, TEST. Below this is a list of quick links:

- Quick link to pages containing information, materials, and content of
- Visit the [AMCA Store](#)
- Visit the [AMCA Tool Kit](#)
- Visit the [AMCA Advocacy Archive](#)
- Visit [AMCA Connect](#)
- Visit [AMCA Certified Ratings Tools](#)
- Visit [Proceedings from Member Only activities](#)
- Read [Past AMCA Member Alerts - 2023 | 2022 | 2021 | 2020](#)
- Read [Past issues of AMCA Member Newsletters](#)
- Read the [AMCA ConstructConnect market research report](#)



The banner features the AMCA International logo on the left, followed by the text "MEMBER ALERT" in large white letters on a red background, and "Air Movement" in smaller white letters on a red background to the right. Below the banner is a red horizontal bar. Underneath the bar, the text "Requesting Extension of DOE Fan-Test-Procedure Deadline" is displayed in a dark red font. Below this text is a list of two items:

- [Instructions for DOE Extension Request \(downloadable\)](#)
- [Template for DOE Extension Request \(downloadable\)](#)

# DOE Corrections To Test Procedure

- Published by DOE in *Federal Register* Aug 18
  - [https://www.regulations.gov/document/EERE-2021-BT-TP-0021-0047?utm\\_medium=email&utm\\_source=govdelivery](https://www.regulations.gov/document/EERE-2021-BT-TP-0021-0047?utm_medium=email&utm_source=govdelivery)
- **Members really should download and read**
  - **No member alert yet**
- Reaction to AMCA letter to DOE sent May 10
  - Followed *ex parte* DOE meeting of staff and members on May 7
    - Letter and DOE response are a handout
- Corrections to terminology, rounding/signif. digits
- Correction to error in circulating fan metric
- Makes correction to AMCA 230
  - AMCA working on erratum
- AMCA also sought clarifications that DOE did not address

# Subsequent Verbal Clarifications

- Ratings/parameters other than FEI, FEP, and cfm/W that are calculated from data taken using DOE test procedure are 'covered' by the DOE test procedure
  - BHP, Total Pressure, Static Pressure, Airflow, etc.
  - Essentially removes 'voluntary' from the table – almost all parameters need in fan commerce are covered by the test procedure
  - DOE believes that these parameters follow normal course of business, anyway – they “adopted AMCA test standards”



# DOE Rebate Program

- Per Member Alert sent August 10
- \$10 million available until funds exhausted
- Extended Product Systems
  - Fans sold with motors and drives (does not include ceiling or circulating fans)
  - Pumps
  - Air compressors
- Fans separated into “DOE Product Classes” per test procedure
- Must meet minimum FEI levels per product class and be “third party verified”
  - AMCA Certified
- For more information about the program, including product criteria:
  - [https://www.energy.gov/sites/default/files/2022-12/Final\\_implementing%20Guidance\\_XPS\\_12-27-22v2.pdf](https://www.energy.gov/sites/default/files/2022-12/Final_implementing%20Guidance_XPS_12-27-22v2.pdf)
- Visit Application Portal at:
  - [https://doerebates.my.site.com/rebates/s/?language=en\\_US](https://doerebates.my.site.com/rebates/s/?language=en_US)
- Specific questions about the program can be directed to [DOERebates@ICF.com](mailto:DOERebates@ICF.com).

# Minimum FEI Ratings for Rebates by Product Class

<b>Fan Equipment Family</b>	<b>Qualifying Criteria Minimum <i>FEI</i></b>
Axial inline fan	1.20
Centrifugal housed fan	1.15
Centrifugal unhooded fan	1.25
Centrifugal inline fan	1.10
Axial panel fan	1.25
PRV	1.10
Radial housed fan	1.15

# DOE Rebate Program

- Fans tested to AMCA 214-21
  - Not DOE test procedure
  - Why?
    - Guess: DOE Test Procedure not effective until Oct. 30
    - More leeway to members to use AMCA 214 sections not accepted by DOE for test procedure
      - Wire-to-Air calculation for fans sold with motors and drives
    - Funds may be exhausted by October 30
    - Extension requests will get member through availability of rebate funds

# CEC Title 20 Update

- Per AMCA Member Alert sent July 11
  - CEC changing test procedure to adopt DOE Final Rule
  - CEC enlarging scope of Title 20 to include embedded fans
  - 0.25-inch font size being eliminated; just make the label legible
  - Deadline not automatically being granted
  - Process will be through a 45-day rulemaking with public comment period and meeting
    - CEC stated rulemaking will be published at end of August or beginning of September
  - DOE treating the preemption as “real”
  - Extension requests for DOE will be parlayed into extension request for CEC
    - Letter to CEC has asked about process; no response yet

# Near Future

- DOE Notice of Proposed Rulemaking (NOPR) for Energy Standard for Fans, Blowers, and Circulating Fans:
  - DOE has finished its work
  - NOPR has entered review phase for Office of Management and Budget
  - Expected from DOE in mid-to-late October (per DOE schedule)
  - Public review period – 60 days? Plus public hearing
  - Approximate deadline for comments: Late December?
  - AMCA Annual Meeting will be held during review period

# Near Future

- DOE response extension requests
  - August 28 deadline; send to [jeremy.dommu@ee.doe.gov](mailto:jeremy.dommu@ee.doe.gov)
- CEC 45-day rulemaking
  - AMCA will send a Member Alert when it is public
- CEC response to extension requests
  - Inquiry is in to CEC for instructions
- August 24: AMCA delegation meeting with DOE
  - Unresolved questions from Letter
  - Legacy data issues
  - Wire-to-Air AEDMs (to replace sections of AMCA 214)
  - Extension requests

# Some Recent Questions from Members

- Q. If my company's products are tested wire-to-air, do I have to worry about sections of AMCA 214 that were omitted (from July 11 AMCA Member Alert table showing differences between AMCA 214 and DOE test procedure)
  - A. No. The primary omissions by DOE had to do with wire-to-air determinations for fans sold with motors and drives by not tested with motors and drives
- Q. Does my company have to replace hardcopy materials to comply with the DOE test procedure by Oct. 30, 2023?
  - A. No – but they must be phased out. All “soft” representations in software and online resources have to be updated by the deadline
- Q. All my circulating fan data are from single-sample tests. Can I use an AEDM for a “second” sample?
  - A. No. The circulating fan test procedure requires a minimum of two samples and then a statistical calculation as specified in the test procedure.

# Some Recent Questions from Members

- Q. Some of our products use a 1 HP motor, but are always rated at <1.0 HP shaft power. Other models use a 1 HP motor, but can be rated at shaft powers both less than and/or greater than 1 HP. How will fans outside the HP scope (<1 HP) be identified?
  - A. Because the definition specifies the shaft horsepower, not motor horsepower, products rated at less than 1 HP shaft power are not subject to the requirements listed in title 20, of the California Code of Regulations. Products that are rated at a shaft power of 1 HP and greater are subject to the requirements of title 20. Being additionally rated at lower horsepower does not change that the triggering condition has been met.
  - Definition and Scope from CEC T20:  
“Commercial and industrial fan or blower” means a rotary-bladed machine used to convert electrical or mechanical power to air power, with an energy output limited to 25 kilojoule per kilogram (kJ/kg) of air. A commercial and industrial fan or blower has a rated fan shaft power greater than or equal to 1 horsepower, or, for fans without a rated shaft input power, an electrical input power greater than or equal to 1 kilowatt (kW); and a fan output power less than or equal to 150 horsepower. They consist of an impeller, a shaft, bearings, and a structure or housing. It may include a transmission, driver, and/or controller at the time of sale.”



# Some Recent Questions from Members

- Q. When will the CEC Title 20 database (MAEDbS) be ready for manufacturer data?
  - A. CEC does not have the MAEDbS ready yet, and we are told it is unlikely to be ready until September. Staff has encouraged CEC to make this date earlier, but we cannot determine if CEC will move faster.
- Q. When will CEC allow manufacturers with laboratories to register for the Fan Regulation?
  - CEC is not yet accepting registrations
  - To register, companies first must create an account with MAEDbS here:
    - <https://cacertappliances.energy.ca.gov/Login.aspx?ReturnUrl=%2fPages%2fCompanyInfo%2f+CompanyList.aspx>
  - You can search for registered laboratories based on product regulation here:
    - <https://cacertappliances.energy.ca.gov/Pages/CompanyInfo/CompanyList.aspx>

# Some Recent Questions from Members

- Lab Search dialog box
- <https://cacertappliances.energy.ca.gov/Pages/CompanyInfo/CompanyList.aspx>

The screenshot shows the 'Company Search' page on the California Energy Commission website. The header includes the 'CA.GOV' logo and 'CALIFORNIA ENERGY COMMISSION' text. A 'SEARCH' button is visible in the header. The main content area is titled 'Company Search' and contains a form with the following fields:

- Company Name:
- Country:
- Company Type:
- Appliance Type:
- Company Status:
- Approval Start Date:
- Approval End Date:

A 'Search' button is located to the right of the date fields. Below the form, the text 'Search Results 595 record(s) found' is displayed. To the right, there are 'Export To:' buttons for 'Excel' and 'CSV'. The footer of the page contains the URL 'www.amca.org'.

# PANEL DISCUSSION



**Charlie Meyers**

CRP and Lab Accreditation,  
Compliance Filing



**Aaron Gunzner, PE**

Advocacy Committees  
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**David Nowak**

Laboratory Testing



**Michael Ivanovich**

Fan Regulation



**Tom Catania**

Regulatory Affairs