

MEMORANDUM

TO: DOE Office of General Counsel

FROM: Doug Smith

DATE: August 29, 2013

RE: Record of Communication Concerning Ceiling Fan and Ceiling Fan Light Kit
Framework Document—Docket No. EERE-2012-BT-STD-0045

This memo provides an overview of communications made to DOE staff on the subject of possible changes to standards and test procedures for ceiling fans and ceiling fan light kits. The communications occurred at a meeting held at 10:30 a.m. on August 20, 2013, following the close of the comment period on the initial framework document for ceiling fans and light kits.

The meeting attendees included:

John Cymbalsky (DOE/EERE)
Lucy deButts (DOE/EERE)
Eric Stas (DOE/OGC)
Francine Pinto (DOE/OGC)
Aris Marantan (Navigant)
Tom Early (Burgess Lighting and Distributing)
Dave Turner (Casablanca Fan Company/Hunter Fan Co.)
Jeremy Tarr (Casablanca Fan Company/Hunter Fan Co.)
Bill Walker (Casablanca Fan Company/Hunter Fan Co.)
Rob Godlewski (Emerson Ceiling Fans)
Nathan Frampton (Fanimation)
Doreen Edelman (Baker, Donelson, Bearman, Caldwell & Berkowitz, PC, for Hunter)
Tony Davidson (Kichler Lighting)
Tim Flannery (Minka Group)
Clark Linstone (Pacific Coast Lighting, Inc.)
Ed Kolb (Quorum)
David Gatto (Westinghouse Lighting Corporation)
Richard Upton (American Lighting Association)
Terry McGowan (American Lighting Association)
Doug Smith (Van Ness Feldman, LLP, for ALA)

A group of 25 ceiling fan and light kit manufacturers, distributors and retailers (list attached), organized by the American Lighting Association (ALA), filed timely written comments on issues raised in the Framework Document. The companies in this group represent more than 90% of the annual U.S. sales of ceiling fans and ceiling fan light kits. This meeting was used to elaborate on issues raised in the group's written comments. The agenda for the meeting is attached. Key points made at the meeting included:

- Many of the ceiling fan technology options identified in the Framework Document present significant technical, consumer utility, and/or cost problems. DC motors and associated electronic controls, for instance, present reliability issues and have high first costs that are very unlikely to be paid back in energy savings for typical consumers. A number of the technology options would create consumer utility problems, such as occupancy sensors incorrectly turning off a fan in bedrooms when occupants are asleep.
- Ceiling fans are often used in conjunction with air conditioning in homes. DOE needs to take this effect into account in evaluating energy savings from any new fan standard, especially if increased first costs for fans drive down fan sales and thereby result in increased AC usage. More research is needed on this AC offset effect.
- The primary driver of light fixture efficiency is the lamp, not the light kit. Lamp efficiency is comprehensively regulated by DOE. Further light kit standards are not appropriate.
- For light kits with 3 or fewer candelabra sockets, or 4 or fewer intermediate base sockets, there is no need for the power limiter requirement given lamp efficiency standards. The limiter itself is a source of product failure and an added cost to consumers, so the existing requirement for a limiter should be eliminated for light kits with these configurations.
- Test procedures that cover fan operation at low, medium, and high speed, such as the existing test procedure, are appropriate. If a single rating value is to be determined based on efficiency at three speeds, DOE will need to specify consumer usage factors. The AccuPoll data submitted by ALA provides a basis for consumer usage factors of: 29% on low; 51% on medium; and 21% on high.

Attachments

ROSTER

ALA-Industry Coalition Of Ceiling Fan Manufacturers And Retailers

Responding To The DOE's Evaluation of Potential New Energy Efficiency Requirements For Ceiling Fans and Ceiling Fan Light Kits

| | |
|--|--|
| Air Cool International, Ltd. | Luminance |
| American Lighting Association | Matthews Fan Company & WPT Design |
| Canarm Ltd. | Maxim Lighting International |
| Casablanca Fan Company /Hunter Fan Co. | Minka Group |
| Emerson Ceiling Fans | Pacific Coast Lighting, Inc. |
| Fanimation | Progress Lighting, a Division of Hubbell |
| Feiss - Monte Carlo | Quorum International |
| Kendal Lighting Inc. | Regency Ceiling Fans |
| Kichler Lighting | Savoy House Lighting |
| King of Fans | The Home Depot |
| Lamps Plus | The Modern Fan Co. |
| Litex Industries Limited/Ellington Fans/Craftmade | Vaxcel International |
| Lowe's Companies, Inc. | Westinghouse Lighting Corporation |

DOE-ALA-Ceiling Fan Industry Meeting Agenda

Tuesday, 20 August 2013

Time: 10:30 AM-1:00 PM

Location: 950 L'Enfant Plaza, #6162
Washington, D.C.

| | | |
|----------|--|--|
| 10:30 AM | I. Meeting Called to Order | |
| | A. Introduction of DOE Attendees and Opening Comments | John Cymbalsky, Supervisor, Appliance Standards, DOE |
| | B. Response and Introduction of ALA/Ceiling Fan Industry Attendees | Dick Upton, ALA |
| | II. ALA Ceiling Fan Industry Comments and Presentation | |
| 10:37 AM | A. Goals of the Meeting | Clark Linstone, Chair ALA Gov. Affairs |
| | B. Key Points - CEILING FANS | Dave Turner, Casablanca/Hunter |
| 10:40 AM | 1. Ceiling fan definition | |
| 10:45 AM | 2. Product classes | |
| | 3. Technology option assessment | |
| 10:50 AM | a. Motors | |
| 11:05 AM | b. Blade design | |
| 11:15 AM | c. Occupancy sensors | Terry McGowan, ALA |
| 11:25 AM | 4. Residential energy consumption – offsetting changes in AC usage | T. McGowan/ D. Turner |
| | C. Key Points - LIGHT KITS | Dave Gatto, Westinghouse |
| 11:40 AM | 1. Primary efficiency driver is the lamp (not the light kit) | |
| 11:45 AM | 2. LEDs | |
| 11:50 AM | 3. Power limiters | |
| 11:55 AM | 4. Utilization/consumer wants and needs | |
| 12:05 PM | D. Test Procedures | Bill Walker, Casablanca/Hunter |
| 12:10 | E. Legal Issues | Doug Smith, Van Ness Feldman |
| 12:15 | F. Flexibility to Defer the Rulemaking | Jeremy Tarr, Casablanca/Hunter |
| 12:30 PM | III. Responding to DOE Questions Not Already Discussed | D. Upton |
| 12:40 PM | IV. DOE's View of Areas Where More Study/Data is Needed | C. Linstone |
| | A. The Framework Document | |
| | B. Points made by the Industry today | |

V. Close

12:47 PM

A. For DOE

J. Cymbalsky

12:50 PM

B. For the Industry

D. Upton

12:55/1:00 PM

VI. Anticipated Adjournment