

DOE Meeting Memorandum

Date: June 13, 2018

DOE Attendees: Sofie Miller, EERE

Outside attendees: Janie Thompson, Cassidy & Associates representing Big Ass Fans

Meeting Contact: Janie Thompson – jthompson@cassidy.com / 202-585-2553

Subject: Final DOE rulemakings on Ceiling Fan Test Procedures and Ceiling Fan Energy Conservation Standard

Summary: Big Ass Solutions is headquartered in Lexington, Kentucky, and manufactures and sells a variety of fan models for commercial, industrial and residential use. BAF met with DOE to discuss the recently finalized rulemakings for ceiling fans.

The conversation focused on how industry is responding to the new rulemakings for ceiling fans, which were finalized in mid-2016 and January 2017 respectively. We discussed the challenges BAS and other manufacturers have noted in seeking compliance with the new ceiling fan Test Procedure, which required compliance starting in January 2017. Specifically, BAF and others are having difficulty achieving “stability” during test as defined under the Final Rule, and industry participants are still seeing a significant lab-to-lab variability when conducting ceiling fan tests according to the Final Test Procedure. In addition, a classification table in the Final Rule causes some ceiling fan models to be reclassified from a residential product class to an industrial (high-speed small diameter) product class.

We also discussed the performance metric for large-diameter ceiling fans contained in the Energy Conservation Standard Final Rule. As written the metric presents a de facto performance limit on BAF’s highest-airflow fans within the product class. BAS made a case that the new Fan Efficiency Index developed by AMCA address this issue by accounting for “the fan laws” (power consumption vs. airflow is cubic) and fan performance as a function of diameter.

Lastly, we discussed a targeted matter in the Test Procedure where a slight tweak in UL Table 507 results in some residential products being inadvertently classified as industrial, leading to challenges for marketers and implications for the Energy Star program.

Enforcement on the Energy Conservation Standard begins in January 2020.

We discussed the opportunity for addressing these issues through a corrective rulemaking, which is teed up under the Unified Agenda under RIN 1904-AD88, how DOE might proceed. BAF described the other contacts we have made with ceiling fan stakeholders and others in industry and our plans to keep close communication with all these parties as well as DOE program staff on the path to a potential remedy.