



600 E. William Street, Suite 200
Carson City, NV 89701
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**GOVERNOR'S
OFFICE OF ENERGY**
energy.nv.gov

PUBLIC COMMENT FORM

To provide public comment, please complete and submit the following form:

- Via email to: info@energy.nv.gov OR
- Via mail to: 600 E. William Street, Suite 200
Carson City, NV 89701

Reason for comment (meeting or regulation change, as applicable): Proposed Reg. NRS 701-700, et seq.

Name of person commenting: Jacki Donner Date: 08/03/22

Name of organization (if applicable): Home Ventilating Institute (HVI)

Address: 1740 Dell Range Blvd., Ste. H, PMB 450
Cheyenne, WY 82009

Phone Number: 855.484.8368 Email address: iaq@hvi.org

Do you wish to be placed on the email service list for this matter to receive further notices?

Yes No

COMMENT:

Note: If more space is required, attachments may be included, but the top portion of this form must be completed and submitted with all comments.

Please see attached letter.

Note: Submitted comments are part of the public record for the rulemaking and may be posted online.



3 August 2022

Governor's Office of Energy
Attn. Robin Yochum
600 E William Street, Suite 200
Carson City, NV 89701

VIA EMAIL TO: ryochum@energy.nv.gov

RE: Comments on Proposed Rule amending Chapter 701 of NAC, adding sections 1-5, LCB File No. R168-22 – Appliance Standards.

Dear Ms. Yochum:

The Home Ventilating Institute (“HVI”) is an ISO 17065 compliant certification body and a trade association representing over 100 manufacturers located in North America, South America, Asia, and Europe. Our manufacturer members provide the residential and light commercial ventilating products that deliver essential indoor air quality to homes and businesses throughout North America. HVI is pleased to partner with Nevada on the new standards for Residential Ventilating Fans (“RVFs”). HVI certifies RVFs, ensuring that consumers and builders can choose high-performing, energy-efficient appliances. HVI’s outstanding record in providing certification in this area resulted in the Nevada Legislature naming HVI’s Publication 916, “HVI Airflow Test Procedure,” as the testing standard for RVFs in the Energy Efficiency Standards for Appliances, codified at NRS 701.700, *et seq.* See NRS 701.768(4)(m).

As an ISO accredited certification body of RVFs, HVI is uniquely positioned to certify compliance with Nevada’s standards and identify compliant products so that Nevada regulators, retailers, installers, distributors, and consumers can be confident that the products stocked on store shelves in the state meet the Legislature’s high goals of energy efficiency.

Sec. 4(1) of the Proposed Rule requires manufacturers to “submit to the Director a certification or proof in a format prescribed by the Director, which demonstrates that the regulated appliance complies with the minimum standard of energy efficiency for that appliance.” The statute names the “HVI Airflow Test Procedure” as the method for showing compliance with the new RVF standards. NRS 701.768(4)(m). **Given that HVI’s testing procedure is an element of compliance, HVI requests that HVI’s Certified Products Directory be approved as a certification format by the Director under the Rule.**

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If the Director approves HVI's publicly accessible Certified Product Directory as a certification format for RVFs under Section 4.1 of the draft rule, **HVI will add a field to its Certified Products Directory for determining Nevada compliance. Each HVI certified product is already labeled as such, and a regulator, retailer, installer, or consumer will be able to easily confirm, by looking up the model number on the product packaging, whether the product complies with Nevada's standards.** HVI already provides this service to the State of Vermont, as shown in the following screenshot taken from Section I of HVI's Directory. See <https://www.hvi.org/hvi-certified-products-directory/>.

HVI Publication 911: Certified Home Ventilating Products Directory®

Section I - Complete Product Listing

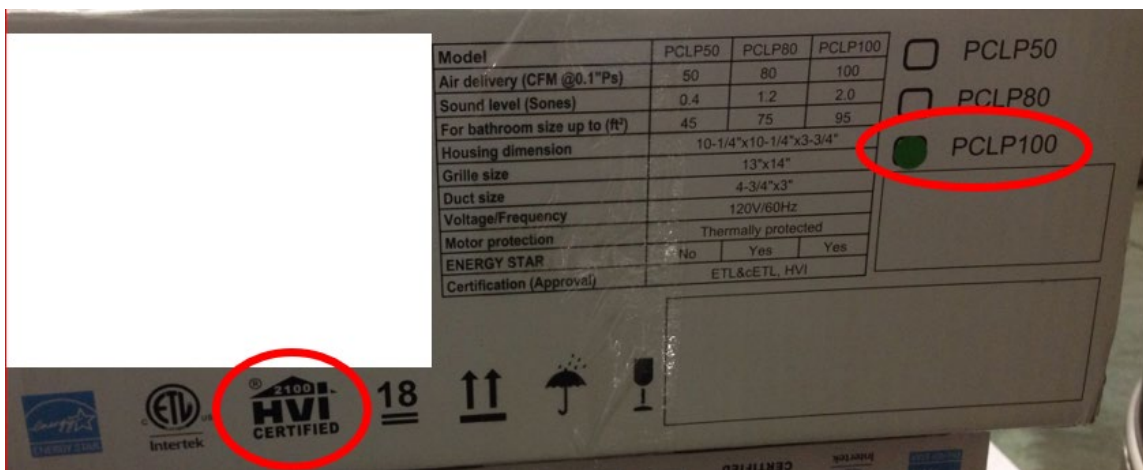
Please note that Model Numbers are shown with spaces and dashes removed in order to facilitate the sorting function within the directory.

* Some HVI-Certified Models are also ENERGY STAR-rated as indicated by a "Yes" in the "ENERGY STAR" column. This field is provided for information only. To confirm the current ENERGY STAR listings, visit the Ventilating Fans Product Finder.

 Save HVI Product Directory as a spreadsheet

Search:

Product Category	Product Subcategory	Brand Owner	Brand Name	Model	Rated Airflow (cfm)	Rated Sound (Sones)	Input Power (Watts)	* Energy Star	Meets Vermont Efficiency Reqs
Bathroom Exhaust Fans		Homewerks Worldwide, LLC	Homewerks Worldwide	7140-50-G3	50	1	17	No	
Bathroom Exhaust Fans		Homewerks Worldwide, LLC	Homewerks Worldwide	7140-50-G3	27			No	No
Bathroom Exhaust Fans		Homewerks Worldwide, LLC	Homewerks Worldwide	7140-80-G3	80	1.5	28	Yes	Yes
Bathroom Exhaust Fans		Homewerks Worldwide, LLC	Homewerks Worldwide	7140-80-G3	58			Yes	Yes



HVI is eager to support Nevada's Appliance Standards through clearly communicating to the Director and the general public whether a listed RVF is certified as complying with Nevada's requirements. We hope that the Governor's Office of Energy will consider our

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recommendation, and we would be glad to discuss these matters further should you have any questions. Please feel free to reach out to Matt Matheny, HVI Engineering Director, at iaq@hvi.org.

Respectfully submitted,

A handwritten signature in blue ink that reads "Jacki Donner". The signature is fluid and cursive, with the first name "Jacki" and last name "Donner" clearly legible.

Jacki Donner, HVI CEO