



600 E. William Street, Suite 200  
Carson City, NV 89701  
(775) 687-7180

**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](mailto: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: 8/12/22

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.*



12 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](mailto:ryochum@energy.nv.gov)

RE: Additional 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”) submitted a Comment on the Proposed Rule on August 3, 2020. Given the Governor’s Office on Energy’s recent amendment to the Proposed Rule, HVI provides this additional comment to supplement that submission.

Sec. 4(2) of Nevada’s Proposed Rule requires manufacturers of new products to “ensure that . . . a new appliance for which the manufacturer has submitted a certification includes a mark, label or tag . . . which identifies the appliance as meeting the standards of energy efficiency established.” The initial version of the Proposed Rule allowed the certification of the product itself to stand in for the requirement of a physical label; the amendment removed this provision.

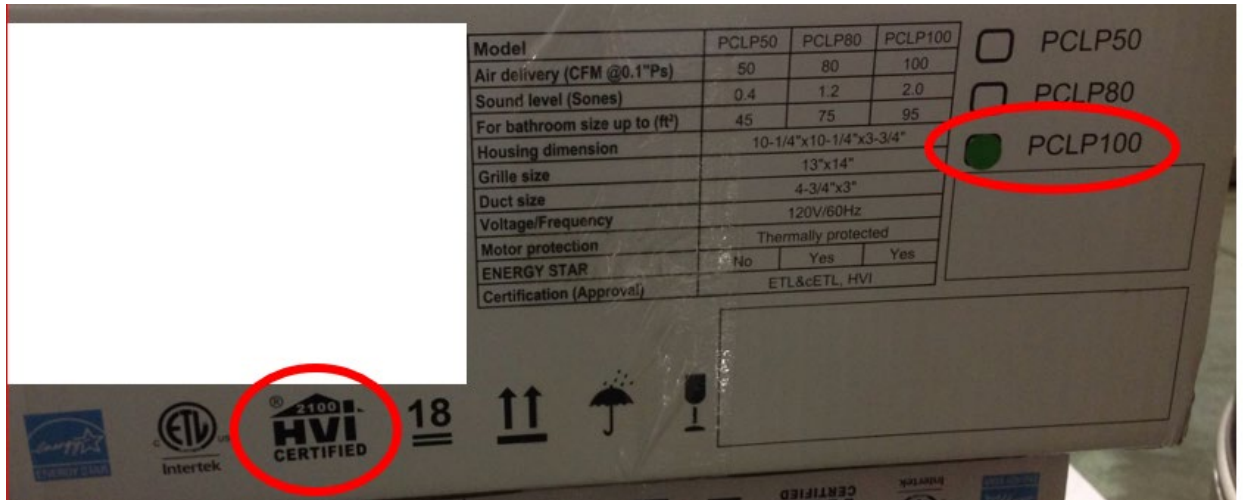
Prior to the adjournment of the August 10 hearing, Mr. Bobzien opined that the amendment probably necessitates a Nevada-specific label. However, the Proposed Rule also allows that “existing marks, labels or tags which connote compliance with the standards of energy efficiency adopted are permissible,” Sec. 4(2)(a). HVI supports a small change to this subsection which will eliminate the need for a state-specific mark and still ensure that consumers, retailers, and regulators can identify compliant products.

Rhode Island recently adopted a similar regulation, and its labeling requirement allowed that “*the model number . . . or any label earned as part of the certification process may be used for this purpose and shall be deemed as providing sufficient information to determine compliance.*” RI Proposed Rule 300-RICR-00-00-4, Sec. 4.5(D) (emphasis added). HVI urges the GOE to consider allowing a product’s model number, together with the ability to reference that product’s energy efficiency levels in a database such as HVI’s Certified Product Directory, to serve as an adequate label under Nevada’s Proposed Rule.

*Advancing the Value of Residential Ventilation for Healthier Living®*

Tel: 855.HVI.VENT • Fax: 480.559.9722 • [www.hvi.org](http://www.hvi.org)

As HVI explained in its initial comment, if the GOE approves HVI's publicly accessible Certified Product Directory as a certification format for residential ventilating fans ("RVFs") in Nevada, **HVI will add a field to its Certified Product 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 standards.**



HVI supports Nevada's new appliance standards and wants its members to focus on producing high-quality RVFs that meet those standards. When each state sets a different requirement for RVF efficiency and requires specific labeling to identify compliant products, text on such a label becomes long and cumbersome as well as constantly obsolete as more states adopt new versions of the requirements. This state-by-state differential, as well as the constantly evolving compliance standards and labeling requirements, will be extremely costly for manufacturers and unnecessarily increase consumer prices. Certainly, in this time of record-breaking inflation, HVI does not want well-meaning regulation to result in unnecessary price increases which will inevitably hurt the consumer.

Thank you for considering this additional suggestion. Please feel free to reach out to Matt Matheny, HVI Engineering Director, with any questions at [iaq@hvi.org](mailto:iaq@hvi.org).

Respectfully submitted,

Jacki Donner, HVI CEO