



SUB ZERO GROUP, INC.

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Chairman Christopher Bray
Senate Committee on Natural Resources and Energy
Vermont General Assembly
Montpelier, VT

Dear Chairman Bray and Members of the Natural Resources and Energy Committee:

I write to the Committee in strong opposition to HB 410, legislation that would set minimum energy efficiency standards for certain home appliance products in Vermont. On behalf of the Sub-Zero Group, a Madison, Wisconsin based appliance company that produces both Sub-Zero refrigeration and Wolf cooking and ventilation appliances and has a long running strategic alliance with Clarke Distributing in the New England region, I am asking the Committee to consider the unintended consequences of HB 410. The manner in which HB 410 seeks to regulate residential ventilation fans creates, in our minds, risk to public health for vulnerable populations which include low income households as well as those suffering from chronic asthma and allergies. The following details Sub-Zero Group concerns with HB 410.

HB 410 seeks to establish ENERGY STAR as the minimum standard for residential ventilation fans and should be deleted.

The ENERGY STAR minimum standard the bill would create for ventilating fans used for ventilation hoods for cooktops and ranges in the kitchen should be deleted. The ENERGY STAR label is widely recognized by consumers as a mark showing the more efficient product choices. If every product were required to meet the ENERGY STAR levels, it would render the label and program meaningless. Furthermore, compliance with ENERGY STAR levels require lower airflow values, which causes challenges related to maintaining safe distances between cooking surface and the hood using lower power for ventilation. It also makes it extremely problematic for hoods used with commercial style gas cooktops due to the inherently larger air volumes associated with five or more gas burners.

Air flow is an important factor in improving indoor air quality while ensuring all income levels can afford the best air quality, especially for homes that cook a lot of stir fry, vegetables, and cooktop grilling. The California Air Resources Board (CARB) funded research on Kitchen Ventilation Solutions to Indoor Air Quality Hazards from Cooking (October 2013). The findings were straightforward – install and use exhaust ventilation in kitchens that remove smoke, remove odors and moisture, and are affordable. Also, CARB states that “[S]tudies have revealed that home air pollutant levels can exceed health-based standards when people are



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cooking in kitchens with poor ventilation. The best way to ventilate is to use a properly-installed, highly efficient range hood (e.g., high cubic feet per minute [cfm] rating and low sones [noise] rating) to remove pollutants produced during cooking activities.”

Another complicating factor is that ventilation systems are very dependent on the installation. Installation is an important factor and is outside the control of appliance manufacturers or the ENERGY STAR levels. Installation of a ventilating duct system that is longer requires increased power to move the air through longer ductwork.

As detailed in this letter, HB 410 creates disadvantages to low income consumers and chronic sufferers of asthma and allergies. Our goal at Sub-Zero Group is to offer products to all consumers at various price points to ensure healthy indoor air quality for all.

Respectfully Submitted,

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