

Natural Resources Defense Council  
Appliance Standards Awareness Project  
American Council for an Energy-Efficient Economy

August 01, 2017

Abigail Daken  
U.S. Environmental Protection Agency  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

RE: ENERGY STAR® Draft 2 Version 4.0 Specifications for Ceiling Fans

Dear Ms. Daken,

The enclosed are the comments of the Natural Resources Defense Council, the Appliance Standards Awareness Project, and the American Council for an Energy-Efficient Economy, in response to the proposed revisions in the Draft 2 Version 4.0 ENERGY STAR Ceiling Fan Specification released on July 5, 2017. We appreciate the opportunity to comment. We stand in strong support of the U.S. Environmental Protection Agency's (EPA) ENERGY STAR program and we support EPA's efforts to update the ENERGY STAR ceiling fan specification.

The ENERGY STAR program has a long history of identifying products with superior energy performance, which helps consumers and businesses save money and protect the environment. ENERGY STAR is one of the most widely recognized and well-trusted brands. Almost 85 percent of American households understand what the label means. Nearly half of all consumers purchased an ENERGY STAR labeled product in the past year. Across the ENERGY STAR program, a \$50 million annual budget produces more than \$30 billion worth of annual consumer utility bill savings.

There has been an ENERGY STAR specification for ceiling fans since 2002. Given that the U.S. Department of Energy (DOE) recently finalized both an updated test procedure for ceiling fans, which takes fan airflow efficiency into account, and the first-ever performance-based standard for ceiling fans, we concur with EPA that the time is ripe for an update to the ENERGY STAR specification.

**We support the proposed minimum efficiency requirements.**

The proposed minimum efficiency requirements are based on the performance of DC motor ceiling fans. EPA estimates that 18% of ceiling fans meet the proposed efficiency and airflow requirements. The revised proposed efficiency requirements for smaller diameter ceiling fans (with a blade span less than or equal to 36 inches) appear to be appropriate to ensure that they exceed the DOE requirements.

**The revised minimum high-speed airflow requirements appear to be appropriate.**

As EPA notes, customer satisfaction with a ceiling fan is chiefly tied to air speed. Because the Draft 1 proposed minimum high-speed airflow requirements were not tied to air speed, they appeared to be too high for smaller diameter fans and too low for larger diameter fans. For larger diameter fans, which are increasingly prevalent in the marketplace, the Draft 1 requirements potentially jeopardized customer utility. The revised minimum airflow requirements are based on a constant air speed across fan diameters, with accommodations for the smallest and largest fans. We support the update to the minimum high-speed airflow requirement to maintain both customer utility across all residential ceiling fan sizes and the integrity of the ENERGY STAR brand.

**We encourage EPA to consider a minimum warranty requirement of 5 years for ceiling fans.**

We support a minimum warranty requirement for ENERGY STAR ceiling fans to help ensure customer satisfaction. In the Draft 2 revision, EPA proposes a minimum warranty requirement of 3 years compared to 10 years proposed in Draft 1. While we understand that a 10-year minimum warranty may not be feasible, we encourage EPA to consider a 5-year minimum warranty requirement. In their comments on the Draft 1 proposal, Big Ass Solutions suggested a minimum warranty of 5 years, which they noted is similar to the warranties provided for other household air-moving equipment.<sup>1</sup>

Thank you for considering these comments.

Sincerely,



Rachel Fakhry  
Schneider Fellow  
Natural Resources Defense Council



Joanna Mauer  
Technical Advocacy Manager  
Appliance Standards Awareness Project

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[https://www.energystar.gov/sites/default/files/BAS%20Comments\\_Ceiling%20Fan\\_Draft%201%20Version%204.0.pdf](https://www.energystar.gov/sites/default/files/BAS%20Comments_Ceiling%20Fan_Draft%201%20Version%204.0.pdf).

A handwritten signature in black ink, appearing to read 'Jennifer Amann', with a stylized, cursive script.

Jennifer Amann  
Buildings Program Director  
American Council for an Energy-Efficient Economy