

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

November 29, 2004

Dear Mr. Richard:

EPA has reviewed your memo dated November 12, 2004 regarding the recent decision made by the Maryland Energy Administration (MEA) to finalize proposed ceiling fan energy efficiency standards. EPA understands that your standard references the ENERGY STAR Ceiling Fan Specification Version 1.1. As the administrator of the ENERGY STAR Program, we feel that it is important that MEA, and other state legislators, understand the limited scope of the current ceiling fan specification and the circumstances under which it was developed.

EPA sets its ENERGY STAR performance requirements for products at levels to recognize the approximate top 25% of models available in the marketplace. This percentage provides a reasonable yet challenging way for products to distinguish themselves. Our current US shipment data indicate that the approximate market penetration of ENERGY STAR models sold with and without light kits is 2% and 25%, respectively. However, with time and continued promotional efforts by EPA and its stakeholders, we hope ENERGY STAR models will be embraced more widely as consumers learn about the energy saving benefits.

During the ceiling fan specification development process, EPA worked closely with manufacturers to develop an appropriate test method to measure fan performance. This test procedure requires a laboratory facility that has been specifically designed to measure airflow and efficiency. Currently, these laboratories most commonly test fans that are 52" in diameter. To qualify products for ENERGY STAR, fan manufactures are required to have their models tested by a laboratory that has been approved by EPA to test to the current specification requirements. At present there are three labs conducting such testing.

Numerous fan tests were conducted to create a performance database to determine the top 25% of models and to set the minimum ENERGY STAR performance requirements included in Version 1.1 of the specification. The test included a variety of models from a wide range of manufacturers. However, the vast majority of ceiling fans tested were 52" models. EPA focused its efforts on the 52" segment and purposely excluded fans with smaller diameters such as 36" and 44" models and *hugger* fans (*hugger* fans have minimal space between the ceiling and the fan housing which enable them to be used in rooms with a low ceiling). EPA's strategy was to focus initially on 52" products given their larger market share and their greater potential for energy savings verses smaller models. This decision was made with the understanding that as the specification gained momentum and demand for ENERGY STAR qualified ceiling fans grew

EPA would revisit the specification to determine if other fan sizes should be addressed. EPA intends to begin this analysis late 2005.

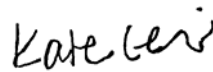
Unfortunately, the current fan specification is not appropriate for fans smaller than 52". Applying a 52" fan specification to the entire fan market, may limit the availability of smaller fans and result in consumers purchasing fans that are too large for their needs, which would use more energy than required to provide adequate airflow to the occupied space. Moreover, if a 36" fan could be designed to meet current ENERGY STAR CFM and CFM/watt requirements, it is likely that it would have to spin at an unacceptably high rate of speed, which would be dangerous, uncomfortable and noisy for the consumer.

If you would like to discuss any of these issues further, please feel free to contact us at the numbers provided below.

Sincerely,



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