



**California Energy Commission
March 12, 2026, Business Meeting
Backup Materials for Association of Home Appliance Manufacturer's (AHAM)
Bathroom Exhaust Fan Testing and Certification Program as Alternative
Procedure**

The following backup materials for the above-referenced agenda item are available as described below:

1. Proposed Order, attached below.
2. Executive Director Recommendation Memorandum, attached below.
3. California Environmental Quality Act (CEQA) analysis, attached below.

For the complete record, please visit: [2025 Energy Code Compliance Option Applications Docket Number 26-BSTD-01](#) at [\[https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=26-BSTD-01\]](https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=26-BSTD-01)

To stay informed about this project and receive documents as they are filed, please subscribe to the Building Energy Efficiency Standards, which can be accessed here: [California Natural Resources Agency \(govdelivery.com\)](#). The Topic sends out email notifications and direct links when documents are filed in the proceeding docket.

CALIFORNIA ENERGY COMMISSION

In the Matter of Association of Home Appliance Manufacturer's Bathroom Exhaust Fan Testing and Certification Program Docket No.: 26-BSTD-01

PROPOSED ORDER Approval of Association of Home Appliance Manufacturer's Bathroom Exhaust Fan Testing and Certification Program as Alternative Procedure

ORDER NO: 26-0312-

I. BACKGROUND

On September 11, 2024, the California Energy Commission (CEC) adopted the 2025 Energy Code, contained in the California Code of Regulations, Title 24, Part 1, Chapter 10, and Part 6, which includes requirements for local mechanical exhaust systems for single-family buildings in Section 150.0(o)1G and multifamily buildings in Section 160.2(b)2Avi. These requirements went into effect on January 1, 2026.

The 2025 Energy Code incorporated by reference ANSI/ASHRAE Standard 62.2-2022 Ventilation and Acceptable Indoor Air Quality¹. Section 150.0(o)1G and Section 160.2(b)2Avi requires that local mechanical exhaust systems, including bathroom exhaust fans, shall be rated for airflow in accordance with ASHRAE 62.2-2022, Section 7.1. ASHRAE requires that airflow and sound ratings for ventilation devices and equipment serving individual dwelling units shall be provided by:

- An administration and certification body that is accredited in accordance with ISO/IEC 17065 with respect to application of the standards and test procedures referenced in Table 7-1 "Laboratory Test Procedures for Airflow and Sound."
- For bathroom fans, the relevant test procedures are listed in Table 7-1 under "other exhaust or supply."
- The administration and certification body is accredited by an accreditation body operating in accordance with ISO/IEC 17011.

Further, Section 10-109(h) of the 2025 Energy Code states that "In addition to the procedures and protocols identified in Sections 10-109(c), 10-116 and the Reference Appendices, the Commission may authorize alternative procedures that demonstrate compliance with Part 6."

On December 18, 2025, the Association of Home Appliance Manufacturers (AHAM) submitted to the CEC an application for CEC approval of AHAM's bathroom

exhaust fan testing and certification program to meet the requirements for manufacturer ratings of airflow for local mechanical exhaust fans specified by the 2025 Energy Code. AHAM submitted documentation to the CEC to demonstrate that their certification program for bathroom exhaust fans, including use of the AHAM Verifide® Mark, meets the requirements of ASHRAE 62.2-2022 Section 7.1. The documentation provided included the following appendices:

- A1. The Procedural Guide for the AHAM program, which is available to members and non-members.
- A2. AHAM HBF-2-2026. This is the test procedure document and is fully based on the requirements of ASHRAE 62.2-2022 clause 7.1 and Table 7-1.
- A3. The on-line directory.
- A4. Lab Qualifications.
- A5. The Certification Body Accreditations.
- A6. Supplemental information about AHAM and the AHAM program.

The CEC provided an initial copy of the application to interested members of the public on January 20, 2026, and accepted comments through February 17, 2026.

On January 31, 2026, AHAM submitted an updated application to the CEC clarifying the scope of their request included both Section 150.0(o)1G and Section 160.2(b)2Avi. The Commission provided a copy of the updated application to interested parties on February 3, 2026, and accepted comments through February 19, 2026.

CEC staff reviewed the application and determined it met all the requirements to be considered as an alternative procedure under Section 10-109(h). The Executive Director evaluated staff's analysis and agrees that AHAM's program provides an acceptable alternative procedure and, therefore, recommends its approval for the 2025 Energy Code under Section 150.0(o)1G for single-family buildings and Section 160.2(b)2Avi for multifamily buildings compliance purposes.

II. STAFF RECOMMENDATION

CEC staff and the Executive Director have considered the application for CEC approval of AHAM's bathroom exhaust fan testing and certification program and confirmed that it meets the requirements for manufacturer ratings of airflow for local mechanical exhaust fans specified by the 2025 Energy Code. Therefore, staff recommend approval of AHAM's bathroom exhaust fan testing and certification program as an alternative procedure to demonstrate compliance with the local mechanical exhaust system rating requirements of the 2025 Energy Code, consistent with Section 10-109(h).

III. ENERGY COMMISSION FINDINGS

Based on the entirety of the record, the CEC finds that:

- 1) On December 18, 2025, the Association of Home Appliance Manufacturers (AHAM) submitted to the CEC an application for CEC approval of AHAM's bathroom exhaust fan testing and certification program.

- 2) On January 20, 2026, the CEC provided an initial copy of the application to interested persons and provided an opportunity for public comment. No comments were received by the close of the comment period on February 17, 2026. A public notice was posted to Docket Number [26-BSTD-01](https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=26-BSTD-01) (<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=26-BSTD-01>).
- 3) The notice provided an opportunity for public comment, and no comments were received by the close of the comment period on February 17, 2026. On January 31, 2026, AHAM submitted an updated application to the CEC for approval of AHAM's bathroom exhaust fan testing and certification program, clarifying the scope of their request included both Section 150.0(o)1G and Section 160.2(b)2Avi.
- 4) On February 3, 2026, the CEC provided a copy of the updated application to interested persons and provided an opportunity for public comment, and no comments were received by the close of the comment period on February 19, 2026. The public notice was posted to Docket Number [26-BSTD-01](https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=26-BSTD-01) (<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=26-BSTD-01>).
- 5) Staff reviewed the updated application, and supporting documentation. No comments were received during the comment periods. Staff's analysis confirmed that AHAM's bathroom exhaust fan testing and certification program meets the requirements of ASHRAE 62.2-2022, Section 7.1.
- 6) The Executive Director reviewed the staff analysis and, on February 25, 2026, submitted a recommendation to the CEC that the Commission approve AHAM's bathroom exhaust fan testing and certification program as an alternative procedure to demonstrate compliance with the local mechanical exhaust system rating requirements of the 2025 Energy Code under Section 150.0(o)1G for single-family buildings and Section 160.2(b)2Avi for multifamily buildings compliance purposes.

The Executive Director reviewed staff's analysis and conclusion that the action is not a project, as defined, under the California Environmental Quality Act (CEQA) or, in the alternative, if it is a project, it is exempt from CEQA pursuant to the common-sense exemption and recommends the CEC confirm this determination

IV. CONCLUSION AND ORDER

The CEC has considered the application materials, staff's analysis, and the Executive Director's recommendations. No written or oral comments were received, and no staff responses were required.

Therefore, the CEC concludes the following in accordance with Section 10-109(h) of the 2025 Energy Code:

- 1) AHAM's bathroom exhaust fan testing and certification program is an alternative procedure to demonstrate compliance with the local mechanical exhaust system rating requirements of the 2025 Energy Code under Section 150.0(o)1G for single-family buildings and Section 160.2(b)2Avi for multifamily buildings compliance purposes.

- 2) Approval of this application is not a project, as defined, subject to the California Environmental Quality Act (CEQA) and, alternatively, if it is a project, it is exempt pursuant to the common-sense exemption under section 15061(b)(3) of the CEQA Guidelines; and,
- 3) The CEC delegates the authority and directs the Executive Director to take, on behalf of the CEC, all actions reasonably necessary to carry out the above direction.

V. IT IS SO ORDERED.

APPROVED AND ADOPTED this [xth] day of [MM YYYY], by the following vote:

AYE:

NAY:

ABSENT:

ABSTAIN:

CERTIFICATION

The undersigned Secretariat to the CEC does hereby certify that the foregoing is a full, true, and correct copy of a resolution duly and regularly approved and adopted by the affirmative vote of the CEC at a meeting held on [MM DD, YYYY].

Kim Todd
Secretariat

MEMORANDUM

TO: CALIFORNIA ENERGY COMMISSION

FROM: DREW BOHAN
EXECUTIVE DIRECTOR
CALIFORNIA ENERGY COMMISSION
715 P STREET
SACRAMENTO, CALIFORNIA 95814

SUBJECT: CEC EXECUTIVE DIRECTOR RECOMMENDATION TO APPROVE ASSOCIATION OF HOME APPLIANCE MANUFACTURER'S BATHROOM EXHAUST FAN TESTING AND CERTIFICATION PROGRAM AS AN ALTERNATIVE PROCEDURE FOR COMPLIANCE WITH THE 2025 ENERGY CODE

DATE: FEBRUARY 25, 2026

BACKGROUND

On September 11, 2024, the California Energy Commission (CEC) adopted the 2025 Energy Code, contained in the California Code of Regulations, Title 24, Part 1, Chapter 10, and Part 6, which includes requirements for local mechanical exhaust systems for single-family buildings in Section 150.0(o)1G and for multifamily buildings in Section 160.2(b)2Avi. These requirements went into effect on January 1, 2026.

The 2025 Energy Code incorporated by reference ANSI/ASHRAE Standard 62.2-2022 Ventilation and Acceptable Indoor Air Quality¹. Section 150.0(o)1G and Section 160.2(b)2Avi require that local mechanical exhaust systems, including bathroom exhaust fans, shall be rated for airflow in accordance with ASHRAE 62.2-2022, Section 7.1. ASHRAE requires that airflow and sound ratings for ventilation devices and equipment serving individual dwelling units shall be provided by:

- An administration and certification body that is accredited in accordance with ISO/IEC 17065 with respect to application of the standards and test procedures referenced in Table 7-1 "Laboratory Test Procedures for Airflow and Sound"
 - For bathroom fans, the relevant test procedures are listed in Table 7-1 under "other exhaust or supply."
- The administration and certification body is accredited by an accreditation body operating in accordance with ISO/IEC 17011.

Further, Section 10-109(h) of the 2025 Energy Code states that "In addition to the procedures and protocols identified in Sections 10-109(c), 10-116 and the Reference Appendices, the Commission may authorize alternative procedures that demonstrate compliance with Part 6."

On December 18, 2025, the Association of Home Appliance Manufacturers (AHAM) submitted to the CEC an application for CEC approval of AHAM's bathroom exhaust fan testing and certification program to meet the requirements for manufacturer ratings of airflow for local mechanical exhaust fans specified by the 2025 Energy Code. AHAM submitted documentation to the CEC to demonstrate that their certification

program for bathroom exhaust fans, including use of the AHAM Verifide® Mark, meets the requirements of ASHRAE 62.2-2022, Section 7.1. The documentation provided included the following appendices:

- A1. The Procedural Guide for the AHAM program, which is available to members and non-members.
- A2. AHAM HBF-2-2026. This is the test procedure document and is fully based on the requirements of ASHRAE 62.2-2022 clause 7.1 and Table 7-1.
- A3. The on-line directory.
- A4. Lab Qualifications.
- A5. The Certification Body Accreditations.
- A6. Supplemental information about AHAM and the AHAM program.

The CEC provided an initial copy of the application to interested members of the public on January 20, 2026, and accepted comments through February 17, 2026.

On January 31, 2026, AHAM submitted an updated application to the CEC clarifying the scope of their request included both Section 150.0(o)1G and Section 160.2(b)2Avi. The Commission provided a copy of the updated application to interested parties on February 3, 2026, and accepted comments through February 19, 2026.

No comments were received during the comment periods. Therefore, CEC staff reviewed the application submitted on January 31, 2026, including supporting analysis. The application asserts that AHAM's bathroom exhaust fan testing and certification program meets the requirements of ASHRAE 62.2-2022, Section 7.1. CEC staff reviewed the updated application and evaluated it against the requirements of ASHRAE 62.2-2022, Section 7.1, including the laboratory test procedures specified in Table 7-1. CEC staff confirmed that AHAM's Verifide® program requires the use of the same laboratory test procedures for airflow measurement and rating of local mechanical exhaust fans referenced by ASHRAE 62.2-2022, including ANSI/ASHRAE 51/AMCA 210 and applicable HVI procedures. The review also examined AHAM's certification framework, including confirmation that airflow ratings are provided by a certification body accredited in accordance with ISO/IEC 17065 and that this certification body is accredited by an accreditation body operating in accordance with ISO/IEC 17011, as required by Section 7.1. Staff also reviewed how airflow ratings are established, verified, and maintained through quality assurance and compliance procedures. Based on this technical evaluation, staff determined that AHAM's program meets, at a minimum, the applicable requirements of ASHRAE 62.2-2022 Section 7.1 for airflow rating and verification. Accordingly, CEC staff concludes that AHAM's program provides an acceptable alternative procedure and recommends its approval for Energy Code compliance purposes. Therefore, staff recommend approval of AHAM's bathroom exhaust fan testing and certification program as an alternative procedure to demonstrate compliance with the local mechanical exhaust system rating requirements of the 2025 Energy Code, Section 150.0(o)1G and Section 160.2(b)2Avi, consistent with Section 10-109(h).

SEQUENCE OF EVALUATION

- On December 18, 2025, AHAM submitted to the CEC an application for CEC approval of AHAM's bathroom exhaust fan testing and certification program.
- On January 20, 2026, the CEC provided a copy of the application to interested persons and provided an opportunity for public comment through February 17, 2026. A public notice was posted to Docket Number [26-BSTD-01](https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=26-BSTD-01) (<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=26-BSTD-01>).
- The notice provided an opportunity for public comment, and no comments were received by the close of the comment period on February 17, 2026.

- On January 31, 2026, AHAM submitted an updated application to the CEC for approval of AHAM’s bathroom exhaust fan testing and certification program, clarifying the scope of their request included both Section 150.0(o)1G and Section 160.2(b)2Avi.
- On February 3, 2026, the CEC provided a copy of the updated application to interested persons and provided an opportunity for public comment through February 19, 2026. A public notice was posted to Docket Number [26-BSTD-01](https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=26-BSTD-01) (<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=26-BSTD-01>).
- The notice provided an opportunity for public comment, and no comments were received by the close of the comment period on February 19, 2026.
- Staff reviewed the updated application, supporting documentation, and all written comments submitted. Staff’s analysis confirmed that AHAM’s bathroom exhaust fan testing and certification program meets the requirements of ASHRAE 62.2-2022, Section 7.1.

CONCLUSION AND RECOMMENDATION

Based upon all of the information and in response to AHAM’s application, in accordance with Section 10-109(h) of the 2025 Energy Code, the Executive Director recommends that the Commission approve AHAM’s bathroom exhaust fan testing and certification program as an alternative procedure to demonstrate compliance with the local mechanical exhaust system rating requirements of the 2025 Energy Code.



Drew Bohan
Executive Director
California Energy Commission

Date: March 12, 2026

MEMORANDUM

TO: Docket 26-BSTD-01

FROM: Will Vicent, Deputy Director, Building Standards

SUBJECT: Basis for finding that the action of approving AHAM's bathroom exhaust fan testing and certification program as an alternative procedure for Energy Code compliance is not a project and is otherwise exempt from the California Environmental Quality Act under the Common-Sense Exemption.

DATE: February 25, 2026

I. California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) Public Resources Code (PRC) sections 21000 *et seq.*, see also CEQA Guidelines, California Code of Regulations (CCR), Title 14, sections 15000 *et seq.*) requires that state agencies consider the environmental impact of certain discretionary decisions. CEQA allows certain projects to be exempted from its requirements. Of relevance here, and discussed further below, is the common-sense exemption (CCR, Title 14, section 15061(b)(3)).

II. Alternative Procedures for Energy Code Compliance (Title 24, Section 10-109(h))

The California Energy Commission (CEC) adopts and regularly updates regulations for new construction, additions, and alterations to residential and nonresidential buildings, which are contained in California Code of Regulations, Parts 1 and 6 (the California Energy Code). These regulations go through an extensive public process and are adopted at a CEC business meeting before going into effect.

Part 1 of the Energy Code includes administrative regulations for implementation. In certain circumstances, interested parties or the CEC may identify alternative procedures that meet the minimum requirements of the Energy Code, but that require additional regulatory action to ensure compliance and consistency with the Energy Code. In these situations, section 10-109(h) of the 2025 Energy Code states that "In addition to the procedures and protocols identified in Sections 10-109(c), 10-116 and the Reference Appendices, the CEC may authorize alternative procedures that demonstrate compliance with Part 6."

III. The Proposed Action

On December 18, 2025, the Association of Home Appliance Manufacturers (AHAM) submitted to the CEC an application for CEC approval of AHAM's bathroom exhaust fan testing and certification program to meet the requirements for manufacturer ratings of airflow for local mechanical exhaust fans specified by the 2025 Energy Code. AHAM submitted documentation to the CEC to demonstrate that their certification program for

bathroom exhaust fans, including use of the AHAM Verifide® Mark, meets the requirements of ASHRAE 62.2-2022, Section 7.1. On January 31, 2026, AHAM submitted an updated application to the CEC clarifying the scope of their request included both CCR, Title 24, Section 150.0(o)1G for single-family buildings and Section 160.2(b)2Avi for multifamily buildings. The CEC provided a copy of the updated application to interested parties on February 3, 2026, and accepted comments through February 19, 2026. No comments were received.

CEC staff reviewed the application submitted on January 31, 2026, including supporting analysis, and all written comments submitted. CEC staff's analysis confirmed that AHAM's bathroom exhaust fan testing and certification program meets the minimum requirements of the 2025 Energy Code. Therefore, CEC staff and the Executive Director recommended the CEC approve AHAM's program as an alternative procedure to demonstrate compliance with the local mechanical exhaust system rating requirements of the 2025 Energy Code, Section 150.0(o)1G and Section 160.2(b)2Avi, consistent with Section 10-109(h). The CEC is considering making findings regarding AHAM's application to be approved as an alternative procedure at the CEC's March 12, 2026, Business Meeting.

IV. CEC findings regarding AHAM's Application are not a CEQA project

A "project" under CEQA is defined as the "whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment" (CCR, Title 14, section 15378(a)). The CEC's findings regarding AHAM's application do not constitute a "project" under CEQA since it is not an activity that may cause a direct or reasonably foreseeable indirect physical change to the environment.

In its findings approving AHAM's application to establish an alternative procedure, the CEC does not change the minimum requirements of the 2025 Energy Code. Instead, CEC is approving a voluntary alternative compliance pathway that guarantees, at least, the same action as already required by the regulations. The CEC's actions in approving an application on its own do not amount to actions that may cause a direct or reasonably foreseeable indirect physical change to the environment, as provided by the CEQA definition for a "project" (CCR, Title 14, section 15378(a)). Accordingly, the CEC's actions are not a "project" for purposes of CEQA.

V. If CEC's findings regarding AHAM's alternative procedure were considered a project, they are exempt from CEQA under the Common-Sense Exemption

Even if considered a project under CEQA, the CEC's approved findings in accordance with section 10-109(h) are exempt from CEQA under the Common-Sense Exemption. The Common-Sense Exemption states that, "Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA" (CCR, Title 14, section 15061(b)(3)).

A “significant effect on the environment” is defined as a “substantial, or a potentially substantial, adverse change” in the environment, and does not include an economic change by itself (Public Resources Code, section 21068; CCR, Title 14, section 15382).

The Common-Sense Exemption would apply as it can be seen with certainty that there is no possibility that the CEC’s findings regarding AHAM’s applications will have a significant effect on the environment (CCR, Title 14, sections 15061(b)(3) and 15061(a)). As discussed above, the findings regarding this application confirm that AHAM’s alternative procedure meets, at a minimum, the requirements in the 2025 Energy Code. It does not require any particular project or design to engage in any activity that was not already evaluated during the 2025 Energy Code rulemaking, which published an initial study and negative declaration for the 2025 Energy Code as a whole. For these reasons, the CEC’s approval of AHAM’s application for an alternative procedure is not subject to CEQA under the Common-Sense Exemption, section 15061(b)(3).

VI. Conclusion

As provided above, the approval of AHAM’s application for its bathroom exhaust fan testing and certification program to meet the requirements for manufacturer ratings of airflow for local mechanical exhaust fans specified by the 2025 Energy Code is not subject to CEQA because the CEC’s findings do not meet the definition of a “project” as it is not an activity that has the potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment. Even if it is a project, it is exempt from CEQA pursuant to the Common-Sense Exemption (CCR, Title 14, section 15061(b)(3)) because it can be seen with certainty that there is no possibility that the activity will have a significant effect on the environment.