



130 Albert Street > Suite 1200 > Ottawa Ontario K1P 5G4 Canada
t 613.236.8428 www.ahamcanada.ca

September 24, 2022

Andrew Howse
Ministry of Energy
Northern Development and Mines, Conservation and Renewable Energy Division
77 Grenville St., 5th Floor
Toronto, ON
M7A 2C1

Re: **Proposal to amend O.Reg. 509/18 under the Electricity Act, 1998 (“Efficiency Regulation”)**

Dear Mr. Howse,

The Association of Home Appliance Manufacturers (AHAM) wishes to submit the following comments concerning the recent proposal to amend [O.Reg. 509/18](#) under the Electricity Act, 1998 (“Efficiency Regulation”). The related section for AHAM members is a proposal to update the dehumidifier scope to use rolling incorporation with the United States Department of Energy (DOE), and the product title would be revised to “Dehumidifier” to reflect the current scope.

AHAM supports Ontario’s efforts to ensure consistency with the current Natural Resources Canada (NRCan) test procedure. We encourage Ontario to cite it instead of the U.S. regulation, and we note that the two procedures are the same.

We encourage Ontario to continue ensuring its regulations are harmonized with NRCan’s to provide residents of Ontario have access to a wide variety of efficient home appliances.

Please do not hesitate to contact me should you have any questions.

Respectfully submitted,

Greg Hall
Director of Regulatory Affairs and Standards
Association of Home Appliance Manufacturers (AHAM) /
Association des fabricants d’appareils électroménagers (AFAE)

Background:

AHAM represents major, portable and floor care home appliances manufacturers and suppliers to the industry. AHAM Canada represents more than 150 member companies that manufacture 90% of the major, portable and floor care appliances shipped for sale in Canada. Home appliances are the heart of the home, and AHAM members provide safe, innovative, sustainable and efficient products that enhance consumers' lives.

The home appliance industry is a significant segment of the economy, measured by the contributions of home appliance manufacturers, wholesalers, and retailers to the Canadian economy. In all, the industry drives nearly \$6 billion in economic output throughout Canada and manufactures products with a factory shipment value of more than \$5 billion. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.