



## Consumer Federation of America

Via email

June 17, 2020

To: Wendy Simons and Blake Shelide  
Oregon Department of Energy  
550 Capitol St. NE, 1st Floor  
Salem, OR 97301

RE: Support for Standards Proposed by ODOE at May 20<sup>th</sup> Advisory Meeting

Dear Ms. Simons and Mr. Shelide,

The Consumer Federation of America (CFA) is pleased to respond to Oregon's Department of Energy (ODOE) request for comments on updating Oregon's energy efficiency standards. CFA is an association of more than 250 nonprofit organizations that was established in 1968 to advance the consumer interest through research, advocacy, and education. For more than two decades, we have been advocating for cost-effective energy and water efficiency standards as they benefit consumers through lower utility bills.

CFA supports the energy efficiency standards proposed by ODOE at the May 20<sup>th</sup> Advisory Meeting. They include standards for consumer products such as computers, common ventilating fans, faucets and showerheads. According to the Appliance Standards Awareness Project (ASAP), Oregonians will save \$40 million annually by 2025 if the standards are adopted, these savings will rise to almost \$120 million annually by 2035. We applaud ODOE for undertaking this important effort.

While there are significant savings with the standards currently proposed, we would like to suggest ODOE include efficiency standards for additional consumer products, specifically air purifiers, toilets and electric vehicle supply equipment, which according to the ASAP would save Oregon consumers and businesses an additional \$20 million annually by 2035.<sup>1</sup> ODOE should also consider moving ahead on standards for certain general service light bulbs that may not be preempted by national standards, as energy savings quickly pay for the slightly higher purchase price. A national public

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<sup>1</sup> 2020 State Appliance Standards Recommendations for Oregon, Appliance Standards Awareness Project, June 2020, [https://appliance-standards.org/sites/default/files/state\\_savings\\_state\\_standards/Oregon.pdf](https://appliance-standards.org/sites/default/files/state_savings_state_standards/Oregon.pdf)

opinion poll conducted by CFA in March 2019<sup>2</sup> found that 64% support standards for uncovered lighting products, such as reflector, three-way and globe light bulbs as well as decorative lights. Adding these products provides even greater opportunity to reduce energy and water waste, lower consumer utility bills, and cut emissions.

With the currently proposed standards as well as the four additional products mentioned above, data provided by ASAP indicates the annual savings for Oregon consumers and businesses by just 2025 to be:

- over \$45 million on utility bills;
- over 260 gigawatt hours of electricity;
- over 1.5 billion gallons of water;
- and 86,000 metric tons of carbon.

We applaud ODOE moving forward on energy and water efficiency standards, and strongly urge you to consider including air purifiers, electric vehicle supply equipment, toilets and certain general service light bulbs which may not be subject to federal standards.

While we have focused on certain consumer products, we also encourage you to consider the additional products proposed by the Appliance Standards Awareness Project. We understand that ASAP has provided you with good information on the benefits of a host of products used by consumers and businesses. When the commercial and industrial sectors save on their operating costs, consumers benefit indirectly through lower costs of goods and services.

In closing, CFA appreciates your action thus far on the beneficial, pro-consumer standards that are being proposed, and we urge you to give serious consideration to including additional products that will provide even greater benefits to Oregonians. This will clearly demonstrate Oregon's continued commitment to being a leader in energy and water efficiency.

Thank you for your consideration.

Sincerely,



Richard Eckman  
Energy Research Associate  
Consumer Federation of America

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<sup>2</sup> The survey was conducted for CFA by Engine International by cell phone and landline on March 21-24, 2019, using a representative sample of 1,007 adult Americans. The survey's margin of error is plus or minus 3.09 percentage points at the 95% confidence level.