

September 24, 2020

The Honorable Frank Pallone ,Jr.
Chairman
Committee on Energy and Commerce
U.S. House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Eddie Bernice Johnson
Chairwoman
Committee on Science, Space and Technology
U.S. House of Representatives
2321 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Pallone and Chairwoman Johnson,

We write in support of Representative Harley Rouda's amendment to H.R. 4447, the Clean Economy Jobs and Innovation Act. This amendment would suspend preemption for federal appliance and equipment standards when the Department of Energy (DOE) misses deadlines to update such standards.

The Department of Energy's appliance standards program is among the nation's most effective laws for saving energy. The energy savings from appliance standards translate into savings for families and businesses, create jobs, make our energy systems more resilient and reliable, foster technological innovation, and reduce emissions that harm public health and the environment.

The typical household spends about \$500 less on utility bills every year than if there were no appliance standards. Across the economy, standards on the books today will have saved consumers and businesses \$2 trillion by 2030. Appliance standards have also played a major role in combatting climate change – carbon dioxide emissions this year will be 345 million metric tons lower as a result of standards.

Unfortunately, progress has been episodic, and over the past three and a half years the national appliance standards program has been seriously mis-handled by DOE. As a result, forward progress on new standards has come to a standstill. By law, DOE must review each national appliance standard every six years and publish either a proposed rule to update the existing standard or a determination that no change is warranted. As of August 2020, DOE has missed legal deadlines for twenty-eight product standards.

States are generally preempted from setting standards for products for which there is a federal standard, and under current law even when DOE fails to update a standard, states' hands are tied. The states cannot prevent the energy waste that costs their citizens and makes it hard to meet their energy and environmental goals.

These missed deadlines for updating appliance standards result in lost savings for consumers and businesses alike. In a 2016 report, Next Generation Standards, the Appliance Standards Awareness Project and the American Council for an Energy-Efficient Economy found that updates to existing appliance standards could save \$43 billion each year on utility bills by 2035 and cut annual carbon dioxide emissions by 134 metric tons.

Mr. Rouda's amendment would provide states seeking those benefits for their citizens the ability to act when and where the federal government fails to. While we would prefer to see a robust, forward

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looking program at DOE, we support this effort to provide a path to the next generation of standards when the agency will not pursue one.

American Council for an Energy-Efficient Economy

Appliance Standards Awareness Project

Consumer Federation of America

National Association of State Energy Officials

Natural Resources Defense Council