



**TECHNET**  
THE VOICE OF THE  
INNOVATION ECONOMY

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February 27, 2020

Sen. Norman Needleman, Chair  
Rep. David Arconti, Chair  
Joint Committee Energy and Technology  
Legislative Office Building, Room 3900  
Hartford, CT 06106

**Re: SB 178- Energy Efficiency Standards**

Dear Chairs Needleman and Arconti and members of the Committee:

TechNet is the national, bipartisan network of over 80 technology companies that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50 state level. TechNet's diverse membership includes dynamic American businesses ranging from startups to the most iconic companies on the planet and represents more than three million employees in the fields of information technology, e-commerce, clean energy, gig and sharing economy, venture capital, and finance. TechNet is committed to advancing the public policies and private sector initiatives that make the U.S. the most innovative country in the world.

TechNet respectfully submits these comments in opposition to SB 178, legislation pertaining to energy efficiency appliance standards. TechNet's member companies strive for and pride themselves on offering highly efficient products for consumers and businesses. While we appreciate and support the impetus for this legislation, it would be largely redundant to enact this legislation.

TechNet believes that Connecticut should rely on voluntary industry standards and existing international and national standards rather than impose state-specific regulations to improve energy efficiency. Industry is unable to support a patchwork quilt of state regulations for products supplied on a national/global scale. Current efficiency standards are already generating significant energy savings and adoptions is widespread.

While the legislation references California legislation for IT products and allows the Commissioner to update regulations to mirror California, the legislation is permissive and not required for the Commissioner to do so. The industry cannot risk having different regulations in different states for the same product. We strongly encourage you consider stronger language to require the Commissioner to update regulations when and if California updates regulations for IT products.

Additionally, our members also have concerns with several lighting definitions. An example of is the definition of “general service lamp” (GSLs), the regulation of which is preempted by Federal law. The Department of Energy has stated this at 84 FR 46669: “Therefore, all states, including California and Nevada, are prohibited from adopting energy conservation standards for GSLs.” As such, we strongly urge you to remove this definition and the GSL efficacy standards from the bill.

We are also concerned with definitions for “cold temperature lamp” and “impact resistant lamp”. Few TLEDs offer a rated operating temperature as low as -20F that the definition of ‘cold temperature’ lamps requires in the bill. Most manufacturers go to -4F. A -20F rating would require a completely new design to guarantee reliable starting at -20F. TLED products are also not inherently more impact resistant than linear fluorescent products. Some now are constructed of glass rather than plastic. Additionally, the volume for both these type of lamps is very low, thus the potential for significant energy savings is low.

Finally, TechNet is concerned that the proposed definition of “electric vehicle supply equipment” conflicts with how the technology is defined in Public Act No. 16-135. We recommend that SB 178 conform to the existing statutory definition for EV charging technology. The Department of Energy and Environmental Protection and Public Utility Regulatory Authority are in the process of addressing planning and strategy for transportation electrification, and consistency in technological definitions will support the achievement of Connecticut’s electric transportation goals.

Thank you for your consideration on these matters. Please do not hesitate to reach out with any questions.

Sincerely,



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