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## TESTIMONY

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ON BEHALF OF  
THE ASSOCIATION OF HOME APPLIANCE MANUFACTURERS

BEFORE THE CONNECTICUT GENERAL ASSEMBLY  
JOINT COMMITTEE ON ENERGY AND TECHNOLOGY

HEARING  
SB 178  
CONCERNING APPLIANCE EFFICIENCY STANDARDS

FEBRUARY 27, 2020

Chairmen Needleman and Arconti, Ranking Members Formica and Ferraro and members of the Committee, the Association of Home Appliance Manufacturers (AHAM) strongly urges the committee to **oppose SB 178**, an act concerning appliance efficiency standards. Although AHAM understands the bill's intent to save energy, SB 178 **has a number of problems relating to home appliances that need to be addressed, not the least of which are health concerns for those with asthma or allergies.**

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. This includes manufacturers of air purifiers/cleaners, portable air conditioners, and commercial clothes washers, which are directly affected by SB 178. AHAM's membership includes over 150 companies that employ tens of thousands of people and produce more than 95% of the household appliances that are shipped for sale within the United States. The factory shipment value of these products is more than \$38 billion annually. The home appliance industry, through its products and innovation, is essential to consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to the U.S. job market and the nation's economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. The purchase of new appliances often represents the most effective choice a consumer can make to reduce home energy use and costs. **Some of the appliances impacted by SB 178 have a direct effect on indoor air quality affecting a significant population with health issues, such as asthma, allergies, and chronic breathing problems.** Our concerns with the bill's impacts on these products for manufacturers and consumers are outlined below.

#### **Expanded Authority on Energy Efficiency Standards**

We appreciate that Connecticut is striving to improve energy efficiency. As leaders in energy efficiency and active participants in efficiency matters before the U.S. Department of Energy, AHAM has a particular interest in SB 178. We oppose the bill's continuance and expansion of DEEP's authority to establish new standards for any new product. SB 178 continues the unrealistic minimum one-year minimum time period to redesign a product. Also, there should be additional limits to this authority, such as requiring a certain threshold of energy savings and impacts on manufacturers. Under federal law, manufacturers have three years to comply with the regulations, which allows for redesign, retooling of factories, pilot product testing, safety testing, and many other requirements to ensure the product is ready for the market. The cost for a state agency to develop standards is very costly, and that should be considered, as well.

#### **Energy Savings**

The goal of saving energy is important but should not be considered irrespective of other consequences, such as impacts to healthy indoor air quality and the products' availability to lower income and disadvantaged populations.

#### **Air Purifiers/Cleaners – Negative Impact on Air Filtration**

The minimum standard the bill would establish for air cleaners should be deleted. No other state has established a minimum energy standard for air cleaners, and for very good reason. In 2004, California was considering energy standards for air cleaners and determined that it should not

move forward. It was decided that this product should be handled by the Indoor Air Quality Division within California's EPA, not the Energy Commission. Please find attached a report by AHAM on this issue, which outlines the reasons why energy standards for air cleaners are not appropriate. **Furthermore, the bill sets levels that are entirely unknown because they are based on smoke CADR (Clean Air Delivery Rate), which is a new metric for the ENERGY STAR program.** The latest version of the ENERGY STAR specification (version 2.0) for air purifiers/cleaners switched to smoke CADR/Watt minimum and is not even effective until July 6, 2020. The current version sets a CADR/Watt based on dust, not smoke. The implications of this bill's standard level is based on no justification or understanding of the marketplace.

For many people, including most importantly the low income segment, air cleaners are purchased for health reasons and as the included report shows, the standards that SB 178 proposes could "destroy the retail price points for units at <\$50 and at \$50-100. This is likely to have a profound effect on consumers who depend on the availability of smaller air cleaners, with lower Clean Air Delivery Rate (CADR) values, for smaller rooms. This may be especially true for those consumers who are at fixed incomes or who are economically disadvantaged."

CADR is the Clean Air Delivery Rate and indicates the volume of filtered air delivered by an air cleaner. The higher the tobacco smoke, pollen and dust numbers, the faster the unit cleans the air in the room. The AHAM label (below) is found on the packaging of more than 15 million air cleaners shipped per year and lists the three CADR particulate reduction numbers – one for tobacco smoke, one for pollen and one for dust. But even more importantly, this label indicates the suggested room size, as tested, that is appropriate for the consumer, avoiding the tendency to just buy bigger and bigger units. This rating system, which indicates performance at the most efficient room size, greatly advantages the people with limited financial resources.



AHAM's Verifide program provides a uniform and practical verification of energy, volume and certain performance criteria for each product, with an independent laboratory performing the verification testing. AHAM is recognized by the EPA as a Certification Body and is approved to administer verification testing for purposes of the ENERGY STAR program. Manufacturers that participate in the programs are identified by the AHAM Verifide Mark (see below) that appears on the product packaging or rating label.



For purchasing the right air cleaner, a person can easily find the AHAM suggested room size noted prominently on the label. This suggested sizing should match the size of the room the consumer is trying to clean. Air cleaners today exist across the full range of CADR. If the CADR rating, which is directly linked to performance and room size, is limited based on wattage as a result of this bill, it will likely cause customers to buy multiple or bigger air cleaners to obtain the performance they were trying to achieve. The reason for this is because any air cleaner first and foremost has to move air across a filter to clean it. The denser the filters, the more watts are needed to move the air through the filtration system. In order to reduce the wattage of the fan/motor system, the filters could be made either less dense or move less air. For example, an optimal air cleaner for a small bedroom for a child that is 10 x 10 feet, or 100 square feet; is a unit with a smoke CADR of 65. In order to be ENERGY STAR in that small size, the product's wattage would be limited to half the dust CADR. If the dust CADR were 65 then the product would be limited to 32 watts. On 120 volts power, that means it would have to operate at less than 1/4 of an amp. That is not many amps to move air through a filter.

The electricity cost for the needed wattage is very low for the important health benefits. For example, if one unit used 100 watts and another used 40 watts, and even assuming it runs 12 hours a day, 365 days a year, the energy difference is only 263 kWh/year or \$2.77/month (assuming the average January 2019 rate of 12.67 cents per kWh in Hartford).

### **Portable Air Conditioners**

On January 10, 2020, DOE published a final rule pertaining to energy conservation standards for portable air conditioners. AHAM supported the publication of DOE's portable air conditioners final rule to ensure national energy savings and a national marketplace. The effective date of this rule is March 10, 2020. Under federal law (42USC6295), federal energy conservation standards preempt state standards on the date the final rule is issued by DOE. Creating a law in Connecticut that is preempted by federal law creates unnecessary confusion and waste of state resources.

### **Commercial Clothes Washers**

On December 15, 2014, the U.S. Department of Energy (DOE) prescribed energy conservation standards for commercial clothes washers. Compliance with the amended standards established for commercial clothes washers was required on January 1, 2018. Of critical importance is that the federal standards preempts any minimum energy standards in Connecticut regardless of the state law in this area. Creating a law in Connecticut that is preempted by federal law creates unnecessary confusion and waste of state resources.

### **Conclusion**

Thank you for the opportunity to present testimony to the committee. As you can see, SB 178 raises serious concerns for consumers and manufacturers. AHAM strongly urges you to reconsider this bill for the reasons set forth in this testimony.

## APPENDIX