

February 27, 2020

Senator Norman Needleman and Representative David Arconti  
Chairs, Energy and Technology Committee  
Legislative Office Building, Room 3900  
Hartford, CT 06106  
In-person and Via Email to [ETtestimony@cga.ct.gov](mailto:ETtestimony@cga.ct.gov)

**Re: CTA Comments on SB No. 178 – An Act Concerning Energy Efficiency Standards**

Dear Senator Needleman, Representative Arconti and Members of the Energy and Technology Committee:

The Consumer Technology Association™ (CTA) appreciates the opportunity to provide comments to the Energy and Technology Committee regarding specific components of [Senate Bill No. 178 \(S.B. No. 178\)](#). CTA would first like to voice our support for the removal of the outdated standards for compact audio players, digital versatile disc players, and digital versatile disc recorders. However, several areas of S.B. No. 178 remain problematic. **CTA respectfully requests the removal of the existing broad authority language granting the Connecticut Commissioner of Energy and Environmental Protection the authority to adopt regulations for any products, including consumer electronics, as well as the removal of the unnecessary standards for computers and computer monitors.**

As North America's largest technology trade association, CTA® is the tech sector. Our members are the world's leading innovators – from startups to global brands – helping support more than 18 million American jobs. For many years, CTA has supported and advanced energy efficiency in consumer technology as part of the industry's broader commitment to environmental sustainability. Our industry has achieved real results – more consumer products than ever are using less energy. We share the Legislature's goal of increasing energy efficiency, but we do not believe the approach outlined in S.B. No. 178 is the path to get there.

Consumer technology products are already an energy efficiency success story without state mandated energy efficiency standards. A recent study commissioned by CTA and produced by Fraunhofer USA finds the number of tech devices in U.S. homes has increased 21 percent since 2010, but those devices now account for *25 percent less* residential energy consumption over that same time.<sup>1</sup> This landmark energy efficiency achievement is due to the consumer tech industry's investments in lightweight materials and energy efficient technologies, as well as the convergence of multi-functional devices and continuous innovation. These achievements weren't accomplished through mandated state or federal requirements.

---

<sup>1</sup> Urban, Roth, Singh, & Howes. "Energy Consumption of Consumer Electronics in U.S. Homes in 2017". December 2017. Available at: <http://www.cta.tech/cta/media/policyImages/policyPDFs/Energy-Consumption-of-Consumer-Electronics-in-U-S-Homes-in-2017.pdf>

Televisions are an excellent example of consumer technology's major energy efficiency strides. A television's annual in-home energy consumption declined 30 percent from 2013 to 2017 – the average cost to power a television in the U.S. is now less than five cents a day.<sup>2</sup> LCDs alone consume 76 percent less energy (per screen area) in 2015 than they did in 2003.<sup>3</sup> These major strides are driven by competition, consumer demand, and voluntary, market-oriented programs like ENERGY STAR. They have not been driven by government mandates.

In addition to the above accomplishments for televisions, CTA has pursued voluntary agreements on energy efficiency. A voluntary agreement for set-up boxes resulted in consumer savings of nearly \$2.1 billion since it was signed in 2013 with nearly 99 percent of new set-top boxes meeting its energy standards. A similar industry agreement for home internet equipment has increased the energy efficiency of more than 98 percent of consumer broadband equipment purchased and sold in the U.S. in 2016.<sup>4</sup>

**CTA does not support the broad authority granted in S.B. No. 178.** As evidenced above, the consumer technology industry has embraced its role in pursuing energy efficiency achievements without mandated state or federal requirements. We object to the language found in Section 1(b)(17) and (d)(3)(A) granting authority to the Commissioner of Energy and Environmental Protection to adopt regulations to establish minimum energy efficiency standards for any product, including consumer electronics.

While CTA appreciates the Legislature's leadership in the area of energy efficiency, the existing broad authority language is concerning given policies and initiatives – EnergyStar and voluntary agreements – currently exist for consumer technology that result in real savings for consumers, while at the same time protecting consumer choice and industry innovation.

We are concerned that the broad authority language provides blanket authorization to the Department of Energy and Environmental Protection (DEEP) to establish energy efficiency standards for any virtually any consumer electronic product. For high tech products, such government standards are not only damaging to technology innovation and design, they ultimately harm consumers and limit their choice of consumer electronic products, features and services. CTA believes that it would be more prudent for the Legislature to retain oversight on the products that it determines need to meet minimum energy efficiency standards, if any.

**Standards for computers and computer monitors are unnecessary.** Consumer technology products, including computers and computer monitors, are sold in a U.S. or North American market, not state-by-state. This means that the most stringent energy efficiency standard found within that market is the de facto energy efficiency standard for the entire market. For computers and computer monitors sold in the U.S. or North American market, the most stringent standards is the California Energy Commission (CEC) standard. As such, the computers and computer monitors sold in Connecticut are already compliant with the CEC standard required in S.B. No. 178 and Connecticut consumers are already benefiting from those energy efficiency savings.

---

<sup>2</sup> Urban, Roth, Singh & Howes. December 2017.

<sup>3</sup> Urban & Roth. "LCD Television Power Draw Trends from 2003 to 2015". May 2017. Available at: <http://www.cta.tech/cta/media/policyimages/policyPDFs/Fraunhofer-LCD-TV-Power-Draw-Trends-FINAL.pdf>

<sup>4</sup> For additional information, visit <https://www.energy-efficiency.us/>.

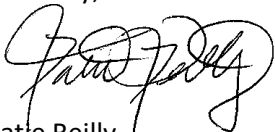
As such, CTA is requesting the removal of the requirements for computers and computer monitors to meet the CEC standards found in Section 1(k)(6). The residents of Connecticut receive the benefits of the energy efficiency standards required for sale in California without any government involvement. Adoption of the California standards in order to achieve energy efficiency savings is a solution looking for a problem. Those achievements will occur regardless of requiring industry to operate under a regulatory scheme in Connecticut for a California standard they are already complying with. The inefficiency and compliance burden for industry to ultimately achieve the same end goal of energy efficiency savings for Connecticut consumers doesn't make sense. Copying of the California standards does not yield energy savings but rather increases compliance costs for manufacturers.

**Conclusion:** CTA and its members are firmly committed to energy efficiency across our industry. For the past 15 years, the industry has worked aggressively on energy efficiency. We're one of the only sectors that actively tracks the energy usage of our products as quantified in CTA's triennial energy efficiency studies. We continue to work with policymakers across the U.S. and globally to urge innovation-friendly, voluntary and market-oriented approaches to energy efficiency for consumer electronics that have proven successful. We've also developed new approaches –industry-led voluntary agreements– that go beyond existing programs to capture additional energy savings in rapidly-evolving product categories.

Industry and policymakers share the goal of energy efficiency but there are many paths to that goal. We do not believe that the approach outlined in S.B. No. 178 is the path to get there. CTA respectfully requests the Committee remove the unnecessary standards for computers and computer monitors as well as the language granting authority to the DEEP to adopt energy efficiency standards for any product, including consumer electronic products.

Please do not hesitate to contact me with any questions or requests for additional information.

Sincerely,



Katie Reilly  
Senior Manager, Environmental and Sustainability Policy  
[kreilly@cta.tech](mailto:kreilly@cta.tech)  
703-625-0054

cc: Senator Matthew L. Lesser, Vice Chair  
Representative Raghiv Allie-Brennan, Vice Chair  
Senator Paul M. Formica, Ranking Member  
Representative Charles J. Ferraro, Ranking Member  
Representative Tim Ackert  
Senator Dennis A. Bradley  
Representative Bill Buckbee  
Representative Holly H. Cheeseman  
Representative Christopher Davids  
Representative Joe de la Cruz  
Representative Mike Demicco  
Representative Josh Elliott  
Representative Jillian Gilchrest

CTA Comments on S.B. No. 178 - OPPOSE  
February 27, 2020

Representative Joseph P. Gresko  
Representative Brian Lanoue  
Representative Rick Lopes  
Representative Stephen R. Meskers  
Representative Chris Perone  
Representative William A. Petit  
Representative John E. Piscopo  
Representative Jonathan Steinberg  
Representative Peter A. Tercyak  
Representative Michael Winkler