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House Energy & Technology Committee

VPIRG Testimony in Support of H.410 – Appliance Efficiency Standards
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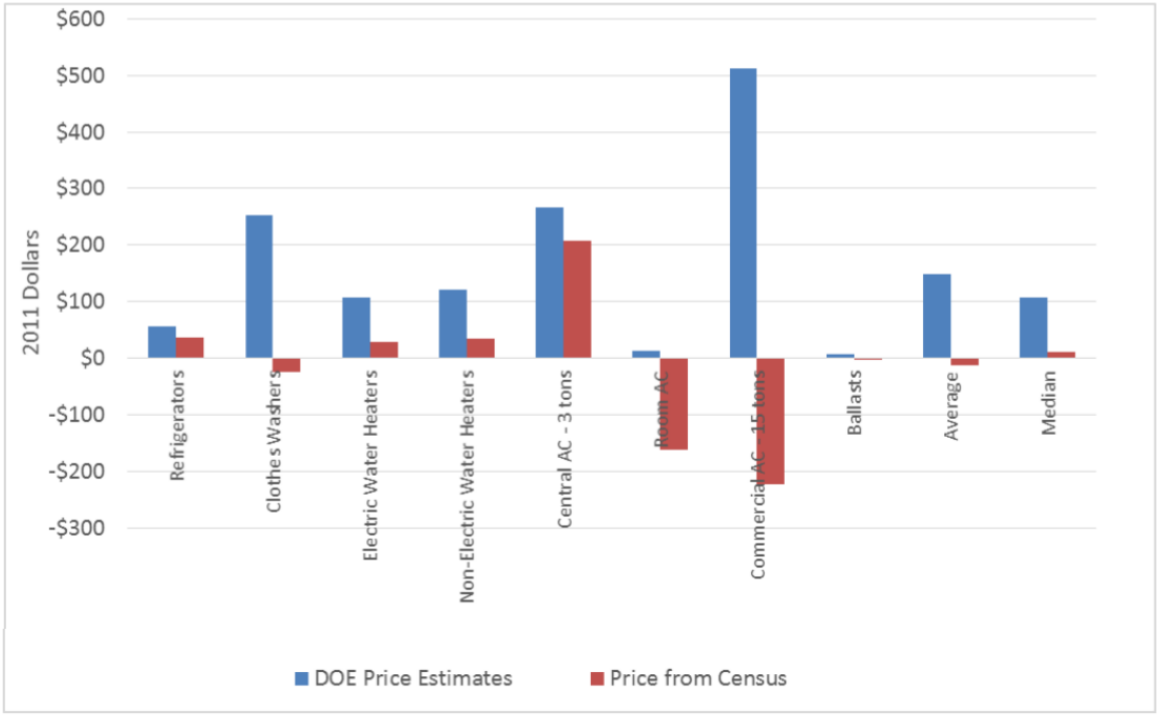
- VPIRG has been advocating for appliance standards at least since the early 1990s. As the Federal standards have been expanded, thanks to broad bipartisan support, advocacy around state level standards has been unnecessary.
- As you heard from Efficiency Vermont yesterday, standards partner well with state efficiency programs. Where efficiency programs encourage the most efficient products and ensure that consumers have access to those products, standards ensure that the worst products simply aren't on the market.
- Standards encourage innovation, resulting in better appliances overall without increasing the cost. In a study of nine products covered by existing standards, ASAP found that "On average, DOE estimated that the new standards would increase product prices by 35%. According to the Census data, on average there was no price increase." (https://appliance-standards.org/sites/default/files/Appliance_Standards_Comparing_Predicted_Expected_Prices.pdf)

Figure ES-1. Comparison of Predicted Manufacturer Price Increase for Standards with Actual Price Increase



Note: For clothes washers, this figure shows the sum of the two standards.

- The high CRI lightbulb piece of the bill is particularly important from an energy and cost savings standpoint. Because of the loophole that exists in the Federal standards, if you have a T12 fixture and are looking to replace your lamp, the lamp you're going to replace it with will be far less efficient than the one you would have bought 20 years ago.
- T12 lightbulbs were intended to be phased out long before today. The first standard for linear fluorescent tubes was set in 1995 at 75 lumens per watt (lpw). High CRI T12 lamps you can buy today range from 55-65 lpw (see chart below), 10-20 lpw below the standard from over twenty years ago.
- Today, these excluded lamps make up 13% of linear fluorescent tubes sold each year, or 64,000,000 lamps.
- If this bill goes into effect and these lamps are discontinued, the lighting needs they're currently filling will not go away, they will be replaced by more efficient lights (manufactured at the same facilities that are currently manufacturing T12 bulbs). For the limited functions that actually require high CRI lighting, LED options exist (including one manufactured by Phillips) that can be easily installed in the same fixture that is currently holding a T12 high CRI lamp. For all other functions, there are many other products available, including both T8 and LED lamps, that can be easily installed to replace the T12 lamp.
- This bill wouldn't take effect until 2020, giving the market time to adjust to new production lines to fill the change in customer demand.