



March 29, 2018

Dear Chairman Bray and Vice Chair Campion,

On behalf of the Information Technology Industry Council (ITI) and TechNet, we appreciate the opportunity to express our concerns with H.410 - *An act relating to adding products to Vermont's energy efficiency standards for appliances and equipment.*

Together, ITI and TechNet represent the most innovative and productive companies in the world. Our companies vigorously compete to offer customers products that meet performance needs and do so with the highest levels of energy efficiency. We are proud of our twenty-five year partnership with the EPA on ENERGY STAR, and of our work with governments worldwide in improving energy efficiency.

Our members were actively engaged throughout the multi-year California Energy Commission (CEC) rulemaking on Computers and Computer Monitors. We ultimately supported the CEC's ambitious standards because of the bill's incorporation of data-driven targets that do not undermine innovation. However, we do not support H.410 because it conflicts with the CEC standards and lacks critical technical components.

Although H.410 directly cites portions of the California Code of Regulations, the bill omits the CEC clause that allows for stakeholders to petition for expedited regulatory review of new technologies entering the market, a critical component for the fast-paced computing and displays industry. The bill also omits technical definitions for components of the CEC regulation, like "discrete GPU" and "OLED Monitor." Harmonized standards are the most productive approach in reaching goals to reduce carbon emissions, and any variations from the CEC standard would cause a significant burden to stakeholders and could reduce market access for Vermont consumers.

Furthermore, the H.410 proposal to regulate computers and computer monitors unnecessarily attempts to duplicate an existing standard (CEC) that already has national implications. The CEC standard prompted an industry-wide effort to significantly change the way computers and computer monitors are designed and manufactured. The energy savings from these products affect the national market and are not only limited to California customers. This bill, if enacted,



puts additional and unnecessary certification and compliance burden on the manufacturers for products that already meet CEC requirements.

We appreciate your consideration of our comments and welcome the opportunity to discuss further.

Sincerely,

A handwritten signature in black ink, appearing to read "AMcBride", written in a cursive style.

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A handwritten signature in blue ink, appearing to read "Matthew Mincieli", written in a cursive style.

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Member Companies

