



**ITI and TechNet Testimony on H. 410 - An act relating to adding products to Vermont's energy efficiency standards for appliances and equipment**

Senate Committee on Natural Resources and Energy  
Friday, April 13, 2018

Good morning, Chairman Bray, Vice Chairman Campion and Members of the Senate Committee on Natural Resources and Energy,

Thank you for the opportunity to testify on House Bill 410. My name is Alex McBride and I'm a Director of Environment and Sustainability at the Information Technology Industry Council (ITI). I'm here on behalf ITI and TechNet. You may recall that Matt Mincieli of TechNet testified on this bill via phone a few weeks ago.

Together, ITI and TechNet have the privilege of representing 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're proud of our global engagement on energy efficiency programs and standards, including our twenty-five year partnership with the U.S EPA's ENERGY STAR program and our recent multi-year collaboration with the California Energy Commission (CEC) on standards for computers and monitors. After four years of collaboration with the CEC, environmental advocates, and other stakeholders, we publicly supported California's ambitious standards when they were adopted in December 2016. The CEC standards have both a national and international impact, and U.S. states including Vermont will experience the energy savings generated by our sectors' compliance with the CEC standards. We do not support, nor do we see the value in, states attempting to duplicate the CEC computer standards, because of the risk and likelihood that these standards will differ.

As it stands, H 410 does not harmonize with the CEC standards for computers and monitors. The bill is missing critical definitions for components of computers and displays, it lacks language about other regulatory elements of the CEC standard, and it is not future-proofed to withstand the likely evolution of the CEC standard as computers and monitors continue to technologically advance. As an example, there have been three separate changes to the CEC standards since the bill passed in December 2016 (ABC test method, discrete GPU definition and mobile workstations definition). There's also a growing list of frequently asked questions where the CEC provides their interpretation of the standards. These FAQs are not in the California Code, so we're unsure of how H 410 would capture this guidance. Finally, the California standard has multiple effective dates ranging from January 2018 to July 2021.

H 410 would create confusion for product manufacturers and will be a significant administrative burden on all stakeholders, including the Vermont legislature, to continually ensure that the Vermont standards are harmonized with California's. We've seen this situation first-hand in other states, like Oregon, who attempted to duplicate CEC standards for battery chargers, and have had to issue multiple rulemakings to adhere to California's changes to their regulations.



In an effort to collaborate on the best possible compromise, we have offered some suggested language that would improve the bill, but we still remain concerned that a separate state bill would insufficiently capture the changes to the CEC standards as they evolve.

In closing, I'd like to emphasize that while we understand the intent of the bill and appreciate Vermont's willingness to lead on environmental issues, the inclusion of computers and monitors into this bill is a solution in search of a problem. The proposal has the potential to create a burden for doing business in Vermont, for no reason, since the CEC standard is already being followed nationally.

Again, we appreciate the opportunity to provide further insight today, and welcome additional discussion on these topics.

Thank you.