



**EVA GREENE**

Analyst, Government Relations

## **Testimony of Eva Greene**

### **In opposition to House Bill 410 An Act Relating to Adding Products to Vermont's Energy Efficiency Standards for Appliances and Equipment**

**Before the House Committee on Environment and Natural Resources**

**March 21, 2018**

Chairman Bray, Vice Chairman Campion, and members of the Natural Resources and Energy Committee, thank you for the opportunity to provide testimony on HB. 410. Whirlpool Corporation strongly urges the committee to reject this legislation, as it would create significant market limitations for Vermont consumers and could negatively impact home indoor air quality.

As the number one appliance manufacturer in the world, Whirlpool has approximately \$21 billion in annual sales, 23,000 U.S. employees, and nine U.S. manufacturing facilities. We sell major and small appliances under brand names such as Whirlpool, Maytag, KitchenAid, Amana, and Jenn-Air.

Whirlpool supports the testimony submitted by the Association of Home Appliance Manufacturers and appreciates the opportunity to provide additional commentary.

#### **HB. 410 Could Greatly Reduce Availability of Microwaves, Ranges and Ventilation Hoods**

If enacted, HB. 410 could have large-scale implications on the availability of cooking products sold in the State of Vermont. The broad definition of "residential ventilating fan" could include a wide scope of products that are engineered to improve air quality in the home. For example, the current language could cover over-the-range microwave ovens, downdraft ranges and cooktops that contain ventilation systems (see accompanying Figure 1 for sample products). Today, few ventilation hoods are certified to ENERGY STAR criteria, and no downdraft cooktops, downdraft ranges or over-the-range microwaves are certified to the ENERGY STAR criteria for residential ventilating fans. As a result, this legislation could greatly reduce appliance choices for Vermont consumers. The scope of this bill impacts many cooking products that are made in the U.S. and support thousands of manufacturing jobs.

ENERGY STAR is a voluntary program, and its criteria are not intended to be used as minimum standards. Furthermore, downdraft ranges, downdraft cooktops and over-the-range microwaves were never intended to be covered by the ENERGY STAR criteria for residential ventilating fans.

#### **HB. 410 Could Result in Inadequate Ventilation for High Output Cooking Products**

Ranges and cooktops offer various options in terms of burner output. For example, a Jenn-Air 48" professional-style range has a maximum output of 90,000 BTUs and Whirlpool recommends ventilation



with a minimum ventilation rating of 600 cfm<sup>1</sup>. HB. 410 could limit availability of ventilation products that meet the minimum recommended ventilation requirements for ranges or cooktops, resulting in insufficient choices for Vermont consumers.

### **Conclusion**

Whirlpool Corporation is dedicated to designing home appliance products that save energy for our customers without compromising performance. Whirlpool has received 26 ENERGY STAR awards in the United States, and 39 awards across the U.S. and Canada, more than any other appliance manufacturer. The requirements set out in HB. 410 would undermine the intent of the ENERGY STAR label and cause significant market limitations for kitchen ventilation products in the State of Vermont. We urge the Committee to reject this legislation and would welcome any further questions from the Committee. Thank you for the opportunity to comment.

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<sup>1</sup> [https://jennair.com/digitalassets/JGRP548WP/Installation%20Instruction\\_EN.pdf](https://jennair.com/digitalassets/JGRP548WP/Installation%20Instruction_EN.pdf) Motor Class CFM