

**Testimony of Garrett McGuire
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**Before the
Natural Resources and Energy Committee
Vermont State Senate**

April 5, 2017

Chairman Bray and members of the Senate Committee on Natural Resources and Energy. Thank you for inviting me to speak today about energy efficiency standards for appliances and equipment.

I join you from just outside Washington, D.C. this morning on behalf of the Air-Conditioning, Heating, and Refrigeration Institute (AHRI). AHRI has over 300 member companies that manufacture quality, safe, efficient, and innovative residential, commercial, and industrial air conditioning, space heating, water heating, and refrigeration equipment and components for sale in North America and around the world. AHRI's member companies represent more than 90 percent of the HVACR and water heating equipment manufactured and sold in North America.

Our members have been the leaders and innovators of highly energy efficient equipment that makes homes comfortable, businesses operational, and climates habitable. Our members also manufacture products that are critical in the preservation of food, pharmaceuticals and other medical supplies critical to saving lives. The equipment on the market today is vastly different and more efficient than the equipment sold even 20 years ago.

AHRI and our members support the federal energy efficiency standards for the HVACR and water heating products "covered" under the Energy Policy and Conservation Act. In many cases, these regulations have been developed through negotiated rulemakings in which our association and our member organizations have been intimately involved with the federal Department of Energy. These federal regulations set a standard that allows for predictability in manufacturing for a national and global market while also providing businesses and homeowners energy savings and environmental benefits. Additionally, it removes the risk of poorly manufactured and operating equipment entering the market without regulation. The Energy Policy and Conservation Act also puts into place a strong federal preemption provision that allows for a national market of energy efficient products. AHRI strongly supports this federal preemption for HVACR and water heating energy efficiency regulations.

It is in our industry's interest that the federal energy efficiency regulations remain in place. Our industry is strongly advocating the current administration to keep in place federal regulations and preemption so that secondary markets marked by inefficient and poor equipment do not occur.

If Vermont would like to remain a leader in energy efficiency policies and programs, and ensure that building design and construction begins with a baseline for energy efficient equipment, the state should continue to adopt industry consensus building energy codes that require construction to meet a variety of energy targets, including federal energy efficiency regulations for HVACR equipment.

H. 411, while good intentioned, is not the proper mechanism for ensuring energy efficient products are sold and installed in Vermont should energy efficiency regulations be repealed. That is done through the adoption of the latest version of energy building codes from ASHRAE, ICC, and the IEC. Again, while the goal of H. 411 is well intentioned, we do not believe it is necessary for the goal it seeks to accomplish.

Thank you for your time and I would be happy to try and answer any questions.