



TESTIMONY OF HELEN WALTER-TERRINONI  
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ON BEHALF OF  
THE AIR-CONDITIONING, HEATING, AND REFRIGERATION INSTITUTE

BEFORE THE VERMONT HOUSE OF REPRESENTATIVES  
COMMITTEE ON NATURAL RESOURCES, FISH, AND WILDLIFE

HEARING ON S 30

MAY 7, 2019

Chair Sheldon, Vice-Chair Lefebvre, and members of the House Committee on Natural Resources, Fish, and Wildlife. My name is Helen Walter-Terrinoni and I am Vice President of Regulatory Affairs for the Air-Conditioning, Heating, and Refrigeration Institute (AHRI). Thank you for allowing me to speak with you today about Senate Bill 30 and its efforts to reduce greenhouse gas emissions from hydrofluorocarbons (HFCs).

AHRI represents more than 300 manufacturers of air-conditioning, heating and commercial refrigeration equipment. It is an internationally recognized advocate for the HVACR industry, and certifies the performance of many of the products manufactured by its members. In North America, the annual output of the HVACR industry is worth more than \$20 billion. In the United States alone, AHRI members employ approximately 130,000 people, and support another 800,000 dealers, contractors, and technicians nationwide.

AHRI has been actively engaged at the international, federal, and state levels with rulemakings and legislation related to the reduction of HFC emissions from stationary air-conditioning and refrigeration systems. As an association, we have organized our members and facilitated information sharing with all of the states that have announced an intent to regulate HFC emissions. It is our goal that through providing technical feedback and industry expertise we can help states, including the State of Vermont, in the adoption and implementation of laws and regulations that are feasible and achieve the objectives of Senate Bill 30 – to reduce emissions of HFCs, help the climate, and also help American businesses retain their positions as global leaders in air conditioning and refrigerant technologies.

With these same objectives in mind, AHRI advocated for the development of the Kigali HFC Amendment to the Montreal Protocol to phasedown high global warming potential (GWP) HFCs. Furthermore, AHRI supports pragmatic, predictable, and cost-effective measures like the adoption of the rules promulgated by the Environmental Protection Agency (EPA) to control the use of high GWP HFCs in specific end uses [Significant New Alternative Policy or SNAP Rules 20 and 21] with some specific exceptions.

HFCs were introduced as refrigerants, and in other uses, with the intent of safely meeting critical societal needs (e.g. food preservation, fire suppression, and delivery of medicines). These needs must continue to be met without increasing risk while balancing environmental benefits and minimizing the cost impact to consumers. It is also important that the phasedown of HFCs allow adequate time for manufacturers, distributors, and contractors to prepare for a safe and efficient transition to lower-GWP technologies.

AHRI would like to see a provision added to the legislation that permits the use of reclaimed refrigerant in new and existing equipment. By adding this provision, end users will be

incentivized to properly capture and dispose of used refrigerants, an important component of the overall strategy to reduce emissions. AHRI would also like to emphasize that our members have a strong preference for technology neutrality when determining which refrigerants might have the smallest carbon footprint in the context of energy efficiency.

We hope this is the start of a conversation between Vermont State and AHRI, especially as you explore additional measures. We believe that AHRI can provide helpful recommendations that are technically feasible, allow for market certainty, benefit consumers and the industries that serve them, while still positively impacting the environment.

Thank you for the opportunity to present testimony at this hearing. AHRI looks forward to working with the members of the committee on the changes and recommendations contained in this testimony, so we can be partners in supporting and achieving the phasedown of high global warming HFCs.