



**Testimony of Jennifer Rushlow
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Support for H.600 – Strengthening Vermont’s Appliance Efficiency Backstop Statute

**Before the House Committee on Energy and Digital Infrastructure
April 16, 2026**

Dear Chair James and Members of the Committee,

My name is Jennifer Rushlow and I am testifying on behalf of Conservation Law Foundation (CLF), where I am Interim Vice President for Vermont. CLF strongly supports H.600, a simple but critical update to Vermont’s existing appliance efficiency backstop statute, 9 V.S.A. ch. 74. H.600 ensures that Vermont residents and businesses are not left exposed to sudden federal rollbacks of appliance efficiency standards, and manufacturers are not faced with regulatory uncertainty and stranded investments. Strong energy efficiency standards for appliances illustrate the well-known adage: the cheapest form of energy is the energy you do not need.

Benefits of Appliance Efficiency Standards

Appliance efficiency standards set minimum performance thresholds that prohibit the manufacture, import, or sale of products that fail to meet specified energy or water efficiency requirements. This testimony will focus on appliance energy efficiency standards. Appliance energy efficiency standards ensure that everyday household appliances, like refrigerators, water heaters, and clothes washers and driers use less energy to provide the same level of use. Such standards reduce utility bills, improve product performance, and reduce strain on the electric grid. In fact, appliance energy efficiency standards provide some of the most cost-effective energy savings available to households, businesses, and institutions, saving the average American family hundreds of dollars per year on utility bills.¹ According to the U.S. Department of Energy (DOE), “[t]he program covers more than 70 products, representing about 90% of home energy use, 70% of commercial building energy use, and 30% of industrial energy use. Standards implemented since 1987 have reduced utility bills for American households and businesses by \$105 billion in 2024 alone.”² Appliance energy efficiency standards provide more energy savings than any other policy, second only to Corporate Average Fuel Economy (CAFE) standards.³ Associated greenhouse gas emissions reductions are also significant—the GHG emissions reductions from *existing*

¹ See Appliance Standards Awareness Project and Am. Council for an Energy-Efficient Econ., *More Savings Ahead: The Potential of Future Appliance Standards*, iv. (June 2025), <https://www.aceee.org/sites/default/files/pdfs/a2501.pdf>.

² U.S. Dep’t of Energy, *Appliance Standards Fact Sheet*, <https://www.energy.gov/sites/default/files/2025-03/Appliance%20Standards%20Fact%20Sheet-02.pdf>.

³ Appliance Standards Awareness Project, *Benefits of Standards*, <https://appliance-standards.org/benefits-of-appliance-standards>.

appliance efficiency standards as of 2016 were estimated to achieve 20% of the U.S. emissions reduction commitment under the Paris Agreement.⁴

Federal standards

Appliance efficiency standards are usually set by the federal government; states are only permitted to regulate appliances that are not already federally regulated. The Energy Policy and Conservation Act (EPCA) was the first U.S. policy to pursue nationwide appliance efficiency standards. EPCA was enacted in 1975 during the Ford Administration in direct response to the 1970s energy crises and associated volatility in oil supply and prices—a goal that remains highly relevant today, as energy markets continue to experience volatility driven by geopolitical instability. The program has grown significantly over time, due in large part to the broad and diverse coalitions of states, manufacturers, consumer groups, utilities, and efficiency advocates that have joined forces in support of the program.⁵ But unfortunately, federal appliance efficiency standards have fluctuated based on administrative priorities—and we currently find ourselves in a downturn.

Recently, DOE has delayed, revised, and reconsidered efficiency standards across multiple appliance categories through rulemaking activity (actual or threatened).⁶ Congress has also considered legislation that would constrain DOE’s authority to strengthen or maintain appliance efficiency standards, or otherwise limit the agency’s rulemaking discretion under EPCA.⁷ Particularly in this political environment, Vermont’s backstop statute is essential because it provides regulatory certainty: if federal efficiency protections are withdrawn, Vermont can preserve a stable baseline of efficiency protections for consumers and manufacturers.

State Backstops

Vermont’s existing backstop statute is widely regarded as one of the most direct and effective models of this approach, but Vermont is not acting in isolation. States are increasingly preparing for potential federal volatility by strengthening their own efficiency standard frameworks. Rhode Island is currently considering legislation that would establish an automatic backstop trigger mechanism similar to Vermont’s statute.⁸ Other states, like New York and California, have policies that ensure that if federal appliance efficiency standards are eliminated, they remain in force through applicable state law.⁹

H.600 is a simple and prudent update to Vermont’s existing appliance efficiency backstop statute. It preserves consumer protections, supports long-term affordability, and ensures that Vermont remains

⁴ Andrew DeLaski & Joanna Mauer, ASAP & Am. Council for an Energy-Efficient Econ., *Next Generation Standards: How the National Energy Efficiency Standards Program Can Continue to Drive Energy, Economic, and Environmental Benefits*, 2 (2016), <https://www.aceee.org/sites/default/files/pdfs/a1604.pdf>.

⁵ Michael B. Gerrard & John C. Dernbach eds., *Legal Pathways to Deep Decarbonization in the United States* 219 (2019) (Kit Kennedy, Lighting, Appliances, and Other Equipment).

⁶ Francisco Camacho and Christa Marshall, *4 things to watch at DOE in 2026*, E&E (January 16, 2026).

⁷ See, e.g., H.R. 4626, 119th Congress (2025) (prohibiting DOE from prescribing appliance efficiency standards in some circumstances); H.R. 6192, 118th Cong. (2023) (changing DOE’s appliance efficiency standard rulemaking requirements).

⁸ H. 7884, 2026 Gen. Assemb., Jan. Sess. (R.I. 2026).

⁹ N.Y. Energy Law § 16-105 (if federal standard ceases, it continues in effect in the state); Cal. Code Regs. tit. 20, § 1605.2 (state regulations align with federal standards to serve as a continuous regulatory floor).



resilient in the face of potential federal regulatory changes. For these reasons, CLF respectfully urges the Committee to vote in favor of H.600. Thank you for your consideration.