



2311 Wilson Boulevard Suite 400 Arlington VA 22201 USA
Phone 703 524 8800 | Fax 703 562 1942
www.ahrinet.org

May 15, 2026

The Honorable Jill Krowinski
Speaker of the House
Vermont State House
115 State Street
Montpelier, VT 05633-5301

RE: *Vermont Senate Bill (SB) 202 -- An Act Relating to Portable Solar Energy Generation*

Dear Madam Speaker:

I am writing on behalf of the Air-Conditioning, Heating, and Refrigeration Institute (AHRI), which is the primary trade association representing over 330 manufacturers of commercial and residential heating, ventilating, air conditioning, refrigeration (HVACR) and water heating equipment. In North America, the annual output of the HVACR and water heating industry is worth more than \$44 billion. In the United States, the industry supports 1.3 million jobs and \$256 billion in economic activity annually.

On May 6, the House Committee on Energy and Digital Infrastructure took language from H. 600, *Appliance Efficiency*, and inserted it into S.202, a bill allowing portable solar energy devices to be installed without a certificate of public good. The bill that advanced out of the House Committee on Energy and Digital Infrastructure and out of the House chamber did **not** adopt the following language:

“minimum efficiency and water conservation standards for each product that is subject to a standard under 10 C.F.R. §§ 430 and 431 as those provisions existed on January 19, 2025 and amended in a final rule entitled, ‘Energy Conservation Program: Energy Conservation Standards for Expanded Scope Electric Motors’ signed on January 8, 2025, excluding any motor incorporated into a product to which a federal energy conservation standard applies under 10 CFR Parts 430 or 431.”

However, the Senate Natural Resources Committee inserted the above language into S. 202, which was passed by the Senate on May 13th. S. 202 will now come before your chamber for concurrence.

AHRI respectfully opposes adding above language on the federal Energy Conservation Standards for Expanded Scope Electric Motors (ESEMs) rulemaking to S. 202. **The final rule was withdrawn by DOE and never published in the *Federal Register***, calling into question its validity as a final rule.

AHRI maintains that expanding the scope of electric-motor regulation would create layered regulation of both motors and the equipment that uses them. Motors in HVACR and water heating equipment are not standalone commodities. HVACR and water heating units are tightly integrated systems in which fans, blowers, and compressors are co-designed to operate together. Regulating a motor in isolation can force changes that degrade system performance or require a full system redesign. This would increase costs for both the motor and the finished product without improving performance and would significantly increase burdens on equipment manufacturers that rely on special- and definite purpose motors and ultimately increase costs for Vermont consumers.

For these reasons, AHRI has consistently opposed ESEM regulation. Hence, we urge the House to remove the language related to ESEMs in S. 202.

Thank you for your consideration. AHRI would be happy to schedule a meeting with you or your staff to discuss this further at your convenience. I can be reached at (202) 302-5165 or sslater@ahrinet.org.

Sincerely,

A handwritten signature in cursive script that reads "Samantha M. Slater".

Samantha Slater
Senior Vice President of Government Affairs

Cc: The Honorable Kathleen James
Members of the Energy and Digital Infrastructure Committee