

May 5, 2026

The Honorable Kathleen James  
Chair, House Committee on Energy and Digital Infrastructure  
Vermont General Assembly  
P.O. Box 1044  
Manchester Center, VT 05255

**RE: *Vermont House Bill 600 (H.600) -- An Act Relating to Appliance Efficiency***

Dear Chair James:

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 April 16, 2026, the Committee on Energy and Digital Infrastructure heard testimony on H.600, which would update Vermont's statute on minimum appliance efficiency standards (Title 9, Chapter 74) with recent Energy Policy and Conservation Act (EPCA) standards. The Appliance Standard Awareness Project (ASAP) urged the Committee to consider "adoption of 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."<sup>1</sup>

AHRI respectfully opposes adding the Energy Conservation Standards for Expanded Scope Electric Motors (ESEMs) rule to H.600. The final rule was withdrawn by DOE and never published in the *Federal Register*, calling into question its validity as a final rule.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

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<sup>1</sup> H.600: ASAP Testimony Brooke Lockwood

without improving performance and would significantly increase burdens on equipment manufacturers that rely on special- and definite-purpose motors.

For these reasons, AHRI has consistently opposed ESEM regulation. Hence, we urge the Committee not to add ESEMs to H.600

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](mailto:sslater@ahrinet.org).

Sincerely,

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

Samantha Slater  
Senior Vice President of Government Affairs

Cc: Members of the Energy and Digital Infrastructure Committee