May 13, 2026

Senate Committee on Natural Resource and Energy
Vermont General Assembly
Vermont State House
115 State Street
Montpelier, VT 05633

Re: Support of S202 - An Act Relating to Portable Solar Energy Generation Devices

Dear Chair Watson and Members of the Committee on Natural Resources and Energy:

ABB respectfully submits the following testimony in support of S.202.

Introduction

ABB is a global technology leader in electrification and automation, enabling a more sustainable and resource-efficient future. By connecting its engineering and digitalization expertise, ABB helps industries run at high-performance; while becoming more efficient, productive and sustainable so they outperform. ABB is the world's largest manufacturer of industrial electric motors and drives. ABB is a large employer and investor in the United States. We employ nearly 17,000 Americans across 40 manufacturing, distribution, and R&D locations, and we have invested more than $14 billion in the US since 2010.

ABB thanks the Committee for the opportunity to provide testimony on S.202. We appreciate the Committee's leadership in advancing energy efficiency and its efforts to provide regulatory clarity for manufacturers and the broader market. We share the Committee's goal of advancing practical efficiency standards that benefit manufacturers, end-users, and the environment.

ABB supports minimum efficiency standards for expanded-scope electric motors (ESEMs)

ABB supports practical efficiency regulations that balance energy-savings objectives with real-world applicability. Efficiency standards that reduce market uncertainty and reflect widely available technology help lower operating costs for businesses and consumers, reduce strain on the electric grid, and contribute to broader sustainability goals.

ABB supports expanding the adoption of higher-performing motors and motor systems and views the ESEMs rule as one way to reduce energy use in residential, commercial, and industrial settings. In 2025, DOE issued a final rule establishing the first federal energy conservation standards for ESEMs, with compliance required beginning January 1, 2029.

As an integral member of the Electric Motors Working Group—a coalition of motor manufacturers, energy-efficiency organizations, and utilities—ABB helped develop the joint recommendation that serves as the foundation for the federal ESEM standards. In anticipation of these standards, ABB has begun making capital investments to update US manufacturing processes and align our product portfolio with the requirements outlined in the rule.

Need for regulatory clarity on ESEMs

While DOE issued a pre-publication Federal Register final rule for ESEMs with a January 1, 2029 effective date, the subsequent withdrawal—with no clear indication of when, or even if, the rule will be reissued—complicates long-term planning for manufacturers like ABB, as well as our downstream customers.

Absent a clear regulatory signal, manufacturers risk either making unnecessary investments or facing gaps in product lineups, increasing disruption for end-users and costs for all involved.

Role of state-backstop standards

State-level "backstop" standards can help address this uncertainty by providing a reliable market signal that supports continued progress toward performance levels already supported by industry, regardless of any federal delay or disruption. States have previously used backstop mechanisms to ensure that, if federal efficiency standards are rolled back or not fully implemented, minimum performance levels remain in place within the state.

By adopting backstop provisions aligned with the federal ESEM standards, the legislature can reinforce market expectations and support manufacturers that are already investing to meet these levels. In addition, strong state action in this area may encourage timely and complete federal implementation of ESEM standards, aligning national policy with the direction of the market.

Treatment of embedded ESEMs

Given the complexity of federal regulations, ABB would support including a provision in state-backstop language that adopts ESEM levels that were published, with an exception applied to end-products already covered by federal efficiency standards. This would address concerns raised by other stakeholders while still offering significant energy savings for the public. ABB believes this is especially important to reduce unnecessary burden for end-products that are already subject to separate federal efficiency requirements, like HVAC equipment.

Removing additional state ESEM requirements eliminates overlapping or conflicting obligations and should address concerns that could undermine broader support for the standards. A clear exclusion for ESEMs embedded in federally regulated products would avoid double regulation while preserving the benefits of the backstop for standalone ESEMs.

Closing

ABB appreciates the opportunity to provide this testimony and looks forward to continued collaboration with the committee on these important issues. We remain committed to supporting policies that deliver cost-effective energy savings, enhance reliability, and maintain a level playing field for manufacturers.

Respectfully,

Kirk Anderson
Director of Government Relations and Public Affairs
1015 15th St NW
Washington, DC 20005
Kirk.Anderson@us.abb.com