



MEMORANDUM

TO: Representative Arthur Handy, Chair, Rhode Island House Environment and Natural Resources Committee

FROM: Josh Craft and David Lis, Northeast Energy Efficiency Partnerships (NEEP)

CC: Chris Kearns, Rhode Island Office of Energy Resources (OER)

DATE: April 8, 2014

RE: NEEP Responses and Suggestions Regarding H. 7799, an Act Relating to Minimum Energy and Water Efficiency Standards

Thank you again for the opportunity to testify at last week's hearing before the House Committee on the Environment and Natural Resources regarding [H. 7799](#), an Act relating to Minimum Energy and Water Efficiency Standards. H. 7799 is an important measure that can reduce energy costs and improve economic productivity while contributing to Rhode Island's energy and environmental policy goals.

Based upon the discussion at the hearing, we have a number of language suggestions for the Committee to consider as it discusses H. 7799.

1) Revised Language on the Appliance Standards in H. 7799

We propose the following minor technical corrections to the bill, to ensure consistency with the existing Rhode Island appliance standards statute and best practices from other states in the region:

- **Water Dispensers/Coolers (Section 42-140.5-4(a)(9)):** There is a reference to water coolers/dispensers in H. 7799, but it's already been adopted by RI in the 2005 bill and the new reference can be taken out.
~~• (9) Water coolers, including both bottled (including compartment type) and bottle less, 18 but excluding units that provide pressurized water;~~
- **Battery Chargers (section 42-140.5-5(b)(1)):** While battery chargers are listed, the standard/efficiency level is not. Here is the appropriate language from the model bill: *"Battery charger systems shall meet the requirements of Section 1605.3 of Title 20 of the California Code of Regulations as in effect on November 1, 2013, as measured in accordance with test methods prescribed in Section 1604 of those regulations."*
- **Electric Spa standards (section 42-140.5-5(b)(5)):** NEEP learned recently that there is a new standard from ANSI and ASPS that has adopted the California efficiency standard for electric spa. The efficiency level would remain the same but with a slightly different standard referenced. The language should be updated as follows: *"(5) Portable electric spas shall meet all the requirements contained in ANSI/APSP/ICC 14 - 2011 the American National Standard for Portable Electric Spa Energy Efficiency as in effect on January 4, 2011, including a normalized standby power not greater than 5(V^{2/3}) watts, where V=the fill volume in gallons (The 2/3 is a superscript: means "V to the two-thirds power") as measured in*



accordance with the test method for portable electric spas contained in ANSI/APSP/ICC 14 - 2011.”

2) Consumer Electronics Association Proposed Amendment to Section 42-140.5-8

The Consumer Electronics Association (CEA) has proposed that Section 42-140.5-8, which discusses certification of new products covered by the state appliance efficiency standards, should be amended to drop the in-state registration and certification for products already certified in California.

There is merit to making this change in order to expedite and simplify the standards adoption process in Rhode Island. As the CEA mentions, Connecticut is seeking to make this change within a bill currently before the Senate there, [SB 357](#). The change could allow the Office of Energy Resources, along with the Energy Efficiency and Resource Management Council (EERMC), and other stakeholders to focus on certification only for products not already certified in California under their Title 20 appliance standards regulations. The following language could be used:

“(b) Manufacturers of any new products covered by § 42-140.5-4 for which (1) no efficiency standards exist in California, and (2) the commissioner adopts efficiency standards shall certify to the commissioner that such products are in compliance with the provisions of § 42-140.5-4. Such certifications shall be based on test results. The commissioner shall promulgate regulations governing the certification of such products and shall coordinate with the certification programs of other states and federal agencies with similar standards.”

3) Changes Suggested by the Office of Energy Resources (OER)

OER in its oral testimony has suggested that the implementation of appliance standards be done jointly between OER and the EERMC, which works with National Grid and other key stakeholders to develop Rhode Island’s annual energy efficiency plans. We concur with this suggestion and stand ready to assist with any further language changes necessary to put this change into effect.

Thank you again for the opportunity to comment on this important energy efficiency measure. Please feel free to contact Josh Craft at jcraft@neep.org or (781) 860-9177 ext. 109 if you have any questions about these or other matters regarding energy efficiency.