

POSITION PAPER: REGIONAL APPLIANCE EFFICIENCY STANDARDS

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The American Supply Association Opposes Regional Standards.

- The recently enacted Energy Independence and Security Act of 2007 gives the Department of Energy (DOE) new authority to set regional energy efficiency standards for furnaces, air conditioners and heat pumps.
- ASA voiced strong objections to the concept of regional efficiency standards. Up to the last minute, ASA sought amendments to the legislation, but was rebuffed in almost every instance.
- The debate over regional standards will move to DOE in 2008. The agency will launch a rulemaking, where ASA will actively participate to mitigate the adverse impact of regional standards on the supply chain.
- The legislation authorizes DOE to set regional standards, in addition to a base national standard for heating and cooling equipment. A DOE-designated region would encompass contiguous states and a state would not be able to opt out of the region. Possible regions would be California and the Southwest for a cooling standard and New England and the upper Midwest for a heating standard.
- One of ASA's major objections is the lack of any meaningful enforcement provisions in the legislation. The end result -- a patchwork of state enforcement, with some states being aggressive and other states choosing not to enforce.
- The next step will be for DOE to begin a rulemaking to decide on regional standards and to determine just who in the supply chain will be legally responsible for compliance with the standards. ASA will participate in the DOE process.

