

From: [Marianne DiMascio](#)
To: [Ungar, Lowell](#); [Steve Nadel](#); [Soheila Pasha](#); [Daniel Bresette](#); [Ben Evans](#); [Kennedy, Kit](#); [Elizabeth Noll](#); [Lauren Urbanek](#); [Noah Horowitz](#); [Timothy Ballo](#); [Mel Hall-Crawford](#); [Charlie Harak](#); [Kristen Driskell](#); [Patrick Saxton](#); [Ellert, Patrick](#); [Charlie Stephens](#); [Claire Miziolek](#); [Tom Eckman](#); [John Wilson](#); [Andrew deLaski](#); [Bijit Kundu](#)
Subject: Key points for Regulatory RFI
Date: Friday, June 30, 2017 10:50:05 AM
Attachments: [Regulation RFI talking points.docx](#)

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If you are submitting comments to DOE in response to the regulatory RFI, feel free to use the attached key points.

Marianne

On Tue, Jun 6, 2017 at 4:45 PM, Marianne DiMascio <mdimascio@standardsasap.org> wrote:

Hi all,

The agenda for the regulatory reform call on Wednesday, June 7 is below. Call is at 2pm Eastern/11am Pacific. Hope you can join us.

Call-in info:

[1-800-882-3610](tel:1-800-882-3610)

code 9547414

Agenda

Discussion of DOE RFI on regulatory reform

COMMENTS DUE JULY 14

1. Overview

DOE is seeking public comments "to assist DOE in identifying existing regulations, paperwork requirements and other regulatory obligations that can be modified or repealed, consistent with law, to achieve meaningful burden reduction while continuing to achieve the Department's statutory objectives."

2. Any word from industry or others on submitting comments?

3. Who plans to submit comments?

4. Strategy for responding

- Do we just respond with benefits/positives of program or do we also look for any regulations or processes that should be repealed or streamlined?

5. Key topics

a) What factors should DOE consider in selecting and prioritizing rules for reform?

b) Any regulations that no longer make sense or are outdated?

c) Processes that should be streamlined?

d) Can we provide accurate, objective information and data about the costs, burdens, and **benefits** of existing regulations? Particularly the effects of regulations over time?

- Recent studies? Reports? (e.g. National lab reports, Better Appliances)

Keep in mind that DOE asks commenters to "identify with specificity the regulation or reporting requirement at issue, providing legal citation where available."

5. Any media action, blog posts?

6. Next steps

- leads for individual and joint comments?

- next call?

Marianne and Andrew

On Thu, Jun 1, 2017 at 9:40 AM, Marianne DiMascio <mdimascio@standardsasap.org> wrote:

Hi all,

We are organizing a call to discuss and coordinate comments for the "Reducing Regulation and Controlling Regulatory Costs" RFI that DOE issued on Monday. The RFI is in response to President Trump's January 30th executive order to reduce regulation and control costs.

If you are interested in participating, please fill out the doodle poll below by the end of the day tomorrow. We'd like to schedule as soon as possible since the comment period is only 45 days (due on July 14th.)

<https://doodle.com/poll/v2x5c2rmww8vqfic>

Here's the RFI:

<https://www.gpo.gov/fdsys/pkg/FR-2017-05-30/pdf/2017-10866.pdf>

Thanks,
Marianne

Key points for responses to DOE's Request for Information (RFI) on regulatory burden.

To submit comments to DOE:

Interested persons are encouraged to submit comments, identified by "Regulatory Burden Reduction RFI," by any of the following methods:

- Federal eRulemaking Portal: <http://www.regulations.gov>. Follow the instructions for submitting comments.
- Email: Regulatory.Review@hq.doe.gov. Include "Regulatory Burden RFI" in the subject line of the message.

Link to RFI: <https://www.gpo.gov/fdsys/pkg/FR-2017-05-30/pdf/2017-10866.pdf>

US consumers and businesses derive enormous benefits from efficiency standards.

The appliance standards program is delivering enormous benefits for the nation. It is one of the most effective policies for saving energy and water and reducing utility bills.

In 2015 alone:

- The average American family saved nearly \$500 on utility bills due to efficiency standards for appliances, lighting, and plumbing products.
- Businesses saved nearly \$23 billion - money that can be invested in jobs.

Accounting for products sold between 1987 and 2035 and for estimated impacts on product costs, existing standards are worth \$2.4 trillion in cumulative net savings for consumers and businesses. Consumer benefits from standards outweigh costs by at least 5 to 1.¹

Energy and water savings from standards help to increase reliability and resiliency by easing the strain on the electric grid and on our nation's water supply.

- Energy savings from existing standards equaled 13 percent of US electricity consumption and 4 percent of natural gas consumption in 2015.
- In 2015, water savings reached 1.5 trillion gallons, enough to meet the needs of all the households in Texas, Oklahoma, Arizona, and Colorado combined.

Efficiency standards overcome market barriers and ensure a level playing field for US manufacturers.

National standards overcome market barriers that prevent the wide adoption of cost-effective efficiency improvements. They ensure that efficiency gains are accessible to all consumers, not just those who can afford high-priced models. Manufacturers measure efficiency levels using a uniform DOE test method that is often based on industry standards.

DOE's certification, compliance and enforcement efforts ensure that products from all manufacturers – US and foreign - meet the efficiency standards, creating a level playing field.

¹ deLaski, A. and Mauer, J. [Energy-Saving States of America: How Every State Benefits from National Appliance Standards](#). 2017.

DOE has a mandate to update standards when key criteria are met.

Under the Energy Policy and Conservation Act, DOE is mandated by Congress to periodically review and, if warranted, update efficiency standards. DOE must determine if updated standards are technologically feasible and economically justified, and would save a significant amount of energy. DOE can only increase a standard if the Secretary of Energy determines that the benefits outweigh the burdens.

Regular review of standards helps push technological advances into the market, providing more benefits to consumers.

According to all the Senate-confirmed Republican and Democratic Assistant Secretaries of Energy who led the DOE Office of Energy Efficiency and Renewable Energy (EERE) between 1989 and 2017: “Standards for many types of residential, commercial, and industrial equipment are required to be regularly updated in order to capture the impact of technology advances and push these advances into the market. Thus, a refrigerator in 1973 used about 1900 kWh of electricity per year but federal R&D and standards have helped drop that electricity use to about 400 kWh per year, saving a typical household roughly \$150 per year.”²

Appliances remain affordable, often declining in price, after standards are adopted.

A March 2017 study found that “prices declined while quality and consumer welfare increased” for major appliances (clothes washers, dryers, refrigerators and room air conditioners) subject to efficiency standards.³

Another study in 2013 found that between 1987 and 2010, energy use for refrigerators, clothes washers, and dishwashers decreased by 50%, 75%, and 50% respectively while prices decreased by 35%, 50%, and 30%.⁴

² Excerpt from letters sent to Energy Secretary Perry and to the Chairs and Ranking Members of the Senate and House Subcommittee on Energy and Water Development. June 2017.

³ Brucal, A., & Roberts. *Do Energy Efficiency Standards Hurt Consumers? Evidence from Household Appliance Sales*. 2017.

⁴ Mauer, J. et al. *Better Appliances: An Analysis of Performance, Features, and Price as Efficiency Has Improved*. 2013.