

**From:** [Eilert, Patrick](#)  
**To:** [Anderson, Mary](#)  
**Subject:** RE: DOE RFI  
**Date:** Monday, June 19, 2017 7:28:56 AM

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Mary-

You are eluding to it, but I think we can say that regulations stimulate innovation. We see this over and over for EE programs and response by builders to standards.

Pat

-----Original Appointment-----

**From:** Anderson, Mary

**Sent:** Friday, June 16, 2017 1:40 PM

**To:** Charles Kim; Eilert, Patrick; John Barbor; 'randall Higa'; Daniela Garcia; Hunt, Marshall; Elliott, Ed; Craig Tyler (craigtyler@comcast.net); Bijit Kundu; Reefe, Jeremy (JMReefe@semprautilities.com)

**Subject:** DOE RFI

**When:** Monday, June 19, 2017 10:00 AM-11:00 AM (UTC-08:00) Pacific Time (US & Canada).

**Where:** Conference Call Info Below

<< File: DOE Regulatory Reform RFI Summary 7June2017.docx >>

DOE has released an RFI on how to streamline improve regulations. We would like to discuss the potential comments. Please see the potential comments below.

### **Summary of Key Issues and Potential Comments**

Topic: DOE shall identify regulations that... *(i) Eliminate jobs, or inhibit job creation; (ii) Are outdated, unnecessary, or ineffective; (iii) Impose costs that exceed benefits...*

- **Jobs**

- Lower utility bills for consumers means larger macroeconomic benefits to the US economy – including creation of jobs
- Costs are likely much smaller (cite ASAP paper)
- [Research specific US manufacturers who have increased product lines/market share due to innovations in response to standards – Cree, others]

- **Utility Sector**

- EE regulations provides the stick to the carrot of incentive programs. Without mandatory regulations, incentive programs can become outdated with limited savings opportunities

- Advocacy on EE regulations are a significant component in the utilities EE portfolio and the most cost-effective program
- EE regulations reduce utilities' capital costs by not having to build new power plants to meet increasing demand
- Peak demand reduction: prevent use of expensive peaker plants
- Test procedures regulations for incentive programs
- **General Benefits**
  - All DOE efficiency regulations adopted have benefits that far exceed the costs
  - Cite statutory requirement in EPCA
- **Consumer Benefits**
  - Lower utility bills means more spending power
  - EE regulations allows US manufacturers to innovate products to make them better performing and feature-rich – increasing customer satisfaction
  - More efficiency appliances help meet state and local building code regulations which lowers costs for builders and owners
- **Statutory Requirements**
  - Cite EPCA and cost-benefit requirements, periodic review of rules
  - Anti-backsliding provision
- **Rulemaking Enhancements**
  - Support working with states to reduce duplicative reporting burdens
  - Support ASRAC working group efforts as a way to streamline regulations

## References

- RFI: <https://www.gpo.gov/fdsys/pkg/FR-2017-05-30/pdf/2017-10866.pdf>
- ASAP Jobs Paper: <http://appliance-standards.org/sites/default/files/Appliance-and-Equipment-Efficiency-Standards-Money-Maker-Job-Creator.pdf>
- ASAP Better Appliance Paper: [https://appliance-standards.org/sites/default/files/Better\\_Appliances\\_Report.pdf](https://appliance-standards.org/sites/default/files/Better_Appliances_Report.pdf)

- ASAP Comparing Predicted and Observed Prices: [https://appliance-standards.org/sites/default/files/Appliance\\_Standards\\_Comparing\\_Predicted\\_Expected\\_Prices.pdf](https://appliance-standards.org/sites/default/files/Appliance_Standards_Comparing_Predicted_Expected_Prices.pdf)
- Executive Order 13771: Reducing Regulation and Controlling Regulatory Costs
  - <https://www.gpo.gov/fdsys/pkg/FR-2017-02-03/pdf/2017-02451.pdf>
- Executive Order 13783: Promoting Energy Independence and Economic Growth
  - <https://www.gpo.gov/fdsys/pkg/FR-2017-03-31/pdf/2017-06576.pdf>

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