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Feb. 7, 2018

The Honorable Rick Perry
Secretary
U.S. Department of Energy
1000 Independence Ave SW
Washington, D.C. 20585

RE: Request for Information for Procedures, Interpretations, and Policies for Consideration of New or Revised Energy Conservation Standards for Consumer Products

Dear Secretary Perry:

The National Conference of State Legislatures (NCSL), the bi-partisan organization representing the legislatures of our nation's states, territories, and commonwealths, appreciates the opportunity to respond to the Department of Energy's (the department) request for information as it works to identify potential modifications to the "Process Rule" for the development of appliance standards.

As the department looks to amend the procedures, interpretations, and policies that guide it in establishing new, or amending energy-efficiency standards, NCSL reiterates its previous statement informing DOE of its adopted National Appliance Efficiency Standards Resolution, also enclosed, that urged the department to:

- Amend standards only when it is technically feasible and economically justified.
- Ensure consumers choice in use of multiple efficient technologies as stipulated by law and in accordance with the review schedule dictated by Congress.

NCSL supports federal energy efficiency standards for appliances, equipment and lighting that not only protect consumers, but provide a cost-effective means to reduce energy and water waste, lower utility bills and decrease pollutants and atmospheric emissions including greenhouse gasses. The standards create a national marketplace and help stimulate innovative technologies which are beneficial to American manufacturers in a competitive global environment.

Further, NCSL urges the department to maintain the benefits that efficiency standards provide to states and consumers across the nation while continuing the review schedule established by Congress as it looks to revise the Process Rule in order to "achieve meaningful burden reduction." We encourage the department to consider NCSL's adopted energy-efficiency standards policy, also enclosed, and we look forward to working with the department as it moves forward with amending the Process Rule.

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Please contact NCSL staff, Ben Husch (ben.husch@ncsl.org) and Kristen Hildreth (kristen.hildreth@ncsl.org) with any additional questions.

Sincerely,



Representative Curt McCormack
Vermont House of Representatives
Co-Chair, Natural Resources and Infrastructure
Committee, NCSL



Representative Ed Orcutt
Washington House of Representatives
Co-Chair, Natural Resources and Infrastructure
Committee, NCSL

Enclosures:

[National Appliance Efficiency Standards Resolution](#)
[NCSL Policy Priority Letter to Secretary Perry, October 2017](#)