

**HB-194**

Submitted on: 2/9/2023 6:37:18 AM

Testimony for EEP on 2/9/2023 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Matt L	Individual	Support	Written Testimony Only

Comments:

- Because Hawai‘i residents and businesses pay the highest electricity rates in the nation, it's important that there are standards in place to ensure that the appliances sold in the state are energy efficient.
- The energy, water, and economic savings from this energy efficiency measure are a win for the state, taxpayers, and our climate.
- Affordability is at the heart of this measure, which is very important for Hawai‘i families and businesses, now more than ever.
- The bill does not require changing out existing products. It means that when new products are purchased, the versions available are more efficient.
- The standards proposed have already been adopted in other states, and without a similar update to the standards in Hawai‘i. We risk being a dumping ground for inefficient products manufacturers can’t sell in other states.
- Embracing energy efficiency is a critical part of addressing climate change and reducing carbon emissions.



**STATE OF HAWAII  
HAWAII CLIMATE CHANGE MITIGATION & ADAPTATION  
COMMISSION  
POST OFFICE BOX 621  
HONOLULU, HAWAII 96809**

**Co-Chairs:**  
Chair, DLNR  
Director, OPSD

**Commissioners:**  
Chair, Senate AEN  
Chair, Senate WTL  
Chair, House EEP  
Chair, House WAL  
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Director, DOH  
Chairperson, DOE  
Director, C+C DPP  
Director, Maui DP  
Director, Hawaii DP  
Director, Kauai DP  
The Adjutant General  
Manager, CZM

**Testimony of  
Leah Laramee  
Coordinator, Hawaii Climate Change Mitigation and Adaptation Commission**

**Before the Senate Committee on  
ENERGY AND ENVIRONMENTAL PROTECTION**

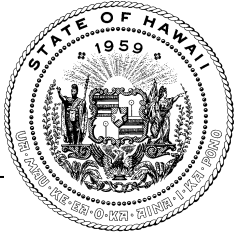
**Thursday, February 9, 2023  
9:00 AM  
State Capitol, Via Videoconference, Conference Room 325**

**In support of  
House Bill 194  
RELATING TO EFFICIENCY STANDARDS**

House Bill 194 allows the chief energy officer of the Hawaii state energy office to enforce minimum efficiency standards and adopt or amend efficiency standards. Sets minimum efficiency standards for air purifiers, electric vehicle supply equipment, portable electric spas, residential ventilating fans, toilets, urinals, and water coolers. **The Hawaii Climate Change Mitigation and Adaptation Commission (Commission) supports this measure.**

The State of Hawaii's commitment to uphold the Paris Climate Accord and progressively move towards zero emissions clean economy by 2045 requires that we actively invest in reducing our emissions and mitigate greenhouse gases (primarily carbon dioxide - CO<sub>2</sub>). Energy efficiency is critical to solving the climate crisis. Efficiency measures have proven to be the most cost-effective way to address climate change while reducing energy waste, saving money, and affordably expanding the use of renewable energy resources. It is vital that we include energy efficiency policies in climate legislation. Utility energy efficiency targets, air purifiers, electric vehicle supply equipment, portable electric spas, residential ventilating fans, toilets, urinals, and water coolers should all be among the basic elements of any climate action.

Mahalo for the opportunity to testify in support of this measure.



# HAWAII STATE ENERGY OFFICE STATE OF HAWAII

JOSH GREEN, M.D.  
GOVERNOR

MARK B. GLICK  
CHIEF ENERGY OFFICER

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Testimony of  
**MARK B. GLICK, Chief Energy Officer**

before the  
**HOUSE COMMITTEE ON ENERGY & ENVIRONMENTAL PROTECTION**

Thursday February 9, 2023  
9:00 AM  
State Capitol, Conference Room 325 and Videoconference

Providing Comments on  
**HB 194**

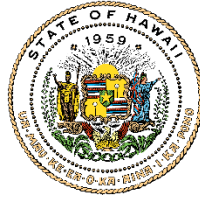
## **RELATING TO EFFICIENCY STANDARDS.**

Chair Lowen, Vice Chair Cochran and Members of the Committee, the Hawai'i State Energy Office (HSEO) respectfully submits comments on the adoption of HB 194 which allows the chief energy officer of HSEO to enforce minimum energy efficiency standards. HSEO's testimony is guided by its mission to promote energy efficiency, renewable energy, and clean transportation to help achieve a resilient, clean energy, decarbonized economy. Adoption of this bill would accelerate the attainment of Hawai'i's decarbonization goals by substantially reducing electricity use, consumers' electricity bills and the production of CO2. HSEO is not an enforcement agency empowered to enforce appliance efficiency standards. With the passage of this bill, Hawai'i will join forces with twelve other states with similar provisions. The Appliance Standards Awareness Project describes the power of efficiency standards to move Hawai'i closer to lower utility bills and to a decarbonized economy.

Thank you for the opportunity to testify.

**JOSH GREEN, M.D.**  
GOVERNOR | KE KIA'ĀINA

**SYLVIA LUKE**  
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



**STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAI'I  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
KA 'OIHANA KUMUWAIWAI 'ĀINA**

P.O. BOX 621  
HONOLULU, HAWAII 96809

**DAWN N.S. CHANG**  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

**LAURA H.E. KAAKUA**  
FIRST DEPUTY

**M. KALEO MANUEL**  
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT  
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ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

**Testimony of  
DAWN N. S. CHANG  
Chairperson**

**Before the House Committee on  
ENERGY AND ENVIRONMENTAL PROTECTION**

**Thursday, February 9, 2023  
9:00 AM**

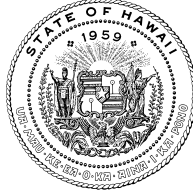
**State Capitol, Conference Room 325 and Videoconference**

**In consideration of  
HOUSE BILL 194  
RELATING TO EFFICIENCY STANDARDS**

House Bill 194 proposes to allow the Chief Energy Officer of the Hawai'i State Energy Office to enforce minimum efficiency standards and adopt or amend efficiency standards. This measure also proposes to set minimum efficiency standards for air purifiers, electric vehicle supply equipment, portable electric spas, residential ventilating fans, toilets, urinals, and water coolers. **The Department of Land and Natural Resources (Department) strongly supports this measure.**

The Department's Commission on Water Resource Management supports the proposed amendments to Part VI of Chapter 196, Hawai'i Revised Statutes, which would expand the list of products subject to State minimum efficiency standards. Per the Hawai'i Water Conservation Plan, per capita consumption of water averages around 170 gallons per person per day across the State of Hawai'i. Improving water and energy efficiency across the State of Hawai'i has become even more urgent due to impacts of climate change and the need to explore enhanced policies and standards to better adapt to these impacts and reduce greenhouse gas emissions. Water efficiency standards established at the state level for toilets and urinals will reduce indoor water use without necessitating changes to the State's plumbing code.

Mahalo for the opportunity to testify in support of this measure.



EXECUTIVE CHAMBERS  
KE KE'ENA O KE KIA'ĀINA

JOSH GREEN, M.D.  
GOVERNOR  
KE KIA'ĀINA

Testimony of **Nani Medeiros**  
Chief Housing Officer, Office of the Governor

Before the  
**House Committee on Energy & Environmental Protection**  
Thursday, February 09, 2023  
9:00 a.m., Via Video Conference  
Conference Room 325

In consideration of  
**House Bill No. 194**  
**RELATING TO EFFICIENCY STANDARDS**

Aloha Chair Lowen, Vice-Chair Cochran, and members of the committee:

Thank you for the opportunity to provide comments on House Bill 194.

We are concerned about the direct impact on the cost of housing that HB 194 would have. We request language be included in the measure to require a cost-benefit analysis be conducted by the chief energy officer for any proposed adoption or amendment of energy efficiency standards and the findings made public, prior to adoption.

Mahalo for your consideration,

Nani Medeiros



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## TESTIMONY

Jacob Cassady  
Director, Government Relations

On Behalf of  
Association of Home Appliance Manufacturers

Before the Hawaii House of Representatives  
Committee on Energy and Environmental Protection

## HEARING

HB 194  
Environmental Standards for Appliances and Fixtures Act

February 9, 2023

Chair Lowen, Vice Chair Cochran, and members of the Committee, the **Association of Home Appliance Manufacturers (AHAM) strongly urges the committee to oppose HB 194**. Although AHAM understands the bill’s intent to save energy, an objective we not only support, but have been key in advancing under the Federal Appliance Standards Program, the legislation has a number of problems relating to home appliances that need to be addressed, specifically with respect to consumer room air cleaners.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM represents more than 150 member companies that manufacture 90% of the major, portable and floor care appliances shipped for sale in the U.S. Home appliances are the heart of the home, and AHAM members provide safe, innovative, sustainable and efficient products that enhance consumers’ lives. The home appliance industry is a significant segment of the economy, measured by the contributions of home appliance manufacturers, wholesalers, and retailers to the U.S. economy. In all, the industry drives nearly \$200 billion in economic output throughout the U.S. and manufactures products with a factory shipment value of more than \$50 billion.

In Hawaii, the home appliance industry is a significant and critical segment of the economy. The total economic impact of the home appliance industry to Hawaii is \$2925.2 million, more than 2,200 direct and indirect jobs, \$68.8 million in state tax revenue and more than \$100.4 million in wages. The home appliance industry, through its products and innovation, is essential to consumer lifestyle, health, safety and convenience. Home appliances also are a success story in terms of energy efficiency and environmental protection. The purchase of new appliances often represents the most effective choice a consumer can make to reduce home energy use and costs.

On January 18, 2023, the Department of Energy (DOE) sent the final standards rule for consumer room air cleaners<sup>1</sup> to the White House Office of Information and Regulatory Affairs (OIRA).<sup>2</sup> The final standards rule is the result of a 2022 determination by DOE that air cleaners qualify as a covered product under Part A of Title III of the Energy Policy and Conservation Act (EPCA), effective September 13, 2022. After OMB approval, DOE can publish final rule and air cleaners would be pre-empted from state laws and regulations regarding minimum energy conservation standards. **This federal regulatory action makes the inclusion of consumer room air cleaners in the legislation unnecessary.**

Energy efficiency advocates and AHAM have worked for the past year towards an agreement on a national minimum energy standard for room air cleaners. That negotiated agreement, which we expect to be implemented by DOE’s upcoming direct final rule, is a win-win for a national marketplace and energy savings, including for consumers in Hawaii. AHAM and the efficiency and consumer advocates that jointly submitted agreed upon standards and accompanying test procedures to DOE are unified in support of implementing this agreement on a national minimum energy standard either through a DOE regulatory process or legislatively through

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<sup>1</sup> In the “Energy Conservation Program: Final Determination of Air Cleaners as a Covered Consumer Product” the US Department of Energy uses the term “consumer room air cleaner,” which is also known as an “air purifier.” <https://www.federalregister.gov/documents/2022/07/15/2022-13655/energy-conservation-program-final-determination-of-air-cleaners-as-a-covered-consumer-product>

<sup>2</sup> OIRA regulatory announcement: <https://www.reginfo.gov/public/do/eoDetails?rrid=293065>

Congress. Also, as part of this agreement, we are supporting a new national EnergyGuide label for air cleaners.

Importantly, absent federal rulemaking and the bill is enacted, Hawaii consumers will be faced with fewer options at higher cost, potentially putting them out of reach for lower-income residents. Air cleaners are a critical tool in the fight against COVID-19, asthma, allergies, and other health risks. Now, especially for people with health concerns, is the wrong time to limit the availability of the lower cost products by setting unnecessarily strict requirements with a product people depend on for their health at home. This is especially true given the unprecedented demand for these products coupled with severe supply chain challenges all industries are facing and which are significantly impacting air cleaner manufacturers' ability to provide an adequate supply of these products which are critical to consumers' health.

The legislation also completely undercuts the very purpose of the ENERGY STAR program, which has successfully created a label designating the more efficient products in the marketplace. ENERGY STAR standards are not intended to serve as a minimum, but are a goal for companies to strive towards by maximizing a product's efficiency. The ENERGY STAR label designation informs the consumer about the more efficient products that are available. Current ENERGY STAR criteria are not intended to be and never should be used as a mandatory minimum.

The legislation's January 1, 2024 requirement for residential room air cleaners to be in compliance is insufficient. Under Federal law, manufacturers have five years to comply with energy conservation standards for new products and three years to comply with amended energy conservation standards, both of which allow for redesign, retooling of factories, pilot product testing, safety testing, and many other requirements to ensure the product is ready for the market. This bill should not continue to include energy conservation standards for room air cleaners, but if it does, it should provide a minimum of five years for compliance.

#### Clean Air Delivery Rate (CADR)

CADR indicates the volume of filtered air delivered by an air cleaner. The higher the tobacco smoke, pollen and dust numbers, the faster the unit cleans the air in the room. The AHAM label (below) is found on the packaging of more than 15 million air cleaners shipped per year and lists the three CADR particulate reduction numbers — one for tobacco smoke, one for pollen and one for dust. But even more importantly, this label indicates the suggested room size, as tested, that is appropriate for the consumer, avoiding the tendency to just buy bigger and bigger units. This rating system, which indicates performance at the most efficient room size, greatly advantages the people with limited financial resources.





AHAM’s Verifide program provides a uniform and practical verification of energy, volume and certain performance criteria for each product, with an independent laboratory performing the verification testing. AHAM is recognized by the EPA as a Certification Body and is approved to administer verification testing for purposes of the ENERGY STAR program. Manufacturers that participate in the programs are identified by the AHAM Verifide Mark (see below) that appears on the product packaging or rating label.



For purchasing the right air cleaner, a person can easily find the AHAM suggested room size noted prominently on the label. This suggested sizing should match the size of the room the consumer is trying to clean. Air cleaners today exist across the full range of CADR. If the CADR rating, which is directly linked to performance and room size, is limited based on wattage as a result of this bill, it will likely cause customers to buy multiple or bigger air cleaners to obtain the performance they were trying to achieve. The reason for this is because any air cleaner first and foremost has to move air across a filter to clean it. The denser the filters, the more watts are needed to move the air through the filtration system. In order to reduce the wattage of the fan/motor system, the filters could be made either less dense or move less air. For example, an optimal air cleaner for a small bedroom for a child that is 10 x 10 feet, or 100 square feet; is a unit with a smoke CADR of 65. In order to be ENERGY STAR in that small size, the product’s wattage would be limited to half the smoke CADR. If the smoke CADR were 65, then the product would be limited to 32 watts. On 120 volts power, that means it would have to operate at less than 1/4 of an amp. That is not many amps to move air through a filter.

The electricity cost for the needed wattage is very low when compared to the important health benefits. For example, if one unit used 100 watts and another used 40 watts, and even assuming

it runs 12 hours a day, 365 days a year, the energy difference is only 263 kWh/year or \$2.77/month.

### Conclusion

AHAM appreciates the opportunity to provide comments on HB 194 and strongly urges the Energy and Environmental Protection Committee to oppose the bill. The goal of saving energy is important but should not be considered irrespective of other consequences, such as impacts to healthy indoor air quality and the products' availability to lower income and disadvantaged populations. AHAM strongly urges you to reconsider this bill for the reasons set forth in this testimony. For future reference, my contact information is 202.872.5955 x327 or via electronic mail at [jcassady@aham.org](mailto:jcassady@aham.org).



Before the House Committee on Energy & Environmental Protection  
Thursday, February 9, 2023 at 9:00 a.m.

Testimony in Support of HB194: Relating to Energy Efficiency Standards

Chair Lowen, Vice Chair Cochran, and Members of the Committee:

Thank you for the opportunity to testify in support and provide comments on House Bill 194.

Hawai'i Energy works to empower island families and businesses on behalf of the Hawai'i Public Utilities Commission (PUC) to make smart energy choices to reduce energy consumption, save money, and pursue a 100% clean energy future. Energy efficiency – the energy we do not use – is the cheapest option to help us achieve our 100% clean energy goal by eliminating waste and being more efficient.

Hawai'i Energy applauds the legislature's efforts to support the continued impact of energy efficiency on Hawai'i's residents and businesses as an integral component of the State's Clean Energy Initiative, which calls for Hawai'i to achieve 100% clean energy by 2045.

In 2019, the State Legislature passed Hawai'i's first minimum appliance standards, a law that went into effect in 2021. Although progress has been made, it is crucial that we do not rest on our laurels. We need to continue to push for more – more minimum standards, more savings, and more customer protection for different appliances.

Appliance standards empower Hawai'i consumers to make the best energy, water and financial choice over the lifetime of the equipment and protect our consumers from 'dumping' by manufacturers who cannot sell less efficient products in markets where standards do exist. This bill adds several appliances to the state's minimum appliance standards, including air purifiers, residential ventilating fans, toilets, urinals, and water coolers.

In addition, adopting the appliance energy standards modeled after and already implemented in California will allow Hawai'i to benefit from the market power that California exerts on manufacturers and the appliances they produce and ensure consistency for manufacturers.

Hawai'i Energy supports minimum appliance standards as a cost effective way to help reach our state's clean energy and carbon neutrality goals.

Thank you for the opportunity to testify in support of House Bill 194.

Sincerely,  
Caroline Carl  
Executive Director  
Hawai'i Energy



Email: [communications@ulupono.com](mailto:communications@ulupono.com)

HOUSE COMMITTEE ON ENERGY & ENVIRONMENTAL PROTECTION  
Thursday, February 9, 2023 — 9:00 a.m.

**Ulupono Initiative supports HB 194, Relating Efficiency Standards.**

Dear Chair Lowen and Members of the Committee:

My name is Micah Munekata, and I am the Director of Government Affairs at Ulupono Initiative. We are a Hawai'i-focused impact investment firm that strives to improve the quality of life throughout the islands by helping our communities become more resilient and self-sufficient through locally produced food, renewable energy and clean transportation choices, and better management of freshwater resources.

**Ulupono supports HB 194**, which allows the chief energy officer of the Hawai'i State Energy Office to enforce minimum efficiency standards and adopt or amend efficiency standards; and, sets minimum efficiency standards for air purifiers, electric vehicle supply equipment, portable electric spas, residential ventilating fans, toilets, urinals, and water coolers, effective 1/1/2025.

Ulupono is supportive of energy and water efficiency measures to lower consumption across the state. This bill seeks to add certain products to the current Hawai'i efficiency standards list adopted in 2019. With the additional seven items listed in this bill, Hawai'i consumers will realize an estimated savings of \$11 million by 2030 and \$24 million by 2040. Additionally, by 2040, adopting these standards will save 552 GWh of electricity and 3 billion gallons of water.<sup>1</sup> It is also worth noting that the State and electric utilities are depending on consumers to do their part in energy efficiency and conservation in order to achieve Hawai'i's 100% Renewable Portfolio Standard by 2045. Adding renewables and reducing demand are both vital in achieving our clean energy future.

Hawai'i leaders must consider our energy and water future to support affordable and resilient options for our local communities in the long run.

Thank you for the opportunity to testify.

Respectfully,

Micah Munekata  
Director of Government Affairs

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<sup>1</sup> <https://appliance-standards.org/>



## HOUSE COMMITTEE ON ENERGY AND ENVIRONMENTAL PROTECTION

February 9, 2023, 9:00 AM

Room 325

### TESTIMONY IN SUPPORT OF HB 194

Aloha Chair Lowen, Vice Chair Cochran, and Committee members:

Blue Planet Foundation **supports HB 194**, which expands the list of household products in Hawai'i that have minimum energy and water efficiency standards. Energy efficiency measures, like setting appliance standards as proposed in House Bill 194, are a simple, accessible, and effective tool to reduce the high-cost of electricity for local residents and businesses, while also accelerating our state's transition to 100% clean energy and carbon-negative economy by 2045.

#### What are appliance efficiency standards?

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Appliance and equipment standards specify the minimum energy and/or water efficiency levels of specific products. Many large household appliances—like refrigerators, washers, and dryers—are regulated by national standards. Action at the state level has historically been the catalyst for national policy. Most of the products now covered by national standards were first subject to state standards. For example, California, New York, and Florida refrigerator standards in the 1970s and 1980s were the basis of and a catalyst for the 1987 national refrigerator standards.

By adopting state appliance efficiency standards, states can fill in the gaps on appliances that aren't regulated by the federal government. While doing so, they also decrease energy use, save consumers and businesses money, and reduce greenhouse gas emissions and other pollutants.

In 2019, Hawai'i adopted appliance efficiency standards for five products sold in the state, including computers and monitors, high color rendering fluorescent lamps, showerheads, faucets, and spray sprinklers (Act 41 of 2019). Since then, 12 other states have also adopted efficiency standards, including for the products in HB 194.

#### Helping Hawai'i save on utility bills

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[info@blueplanetfoundation.org](mailto:info@blueplanetfoundation.org)

126 Queen Street, Suite 204 • Honolulu, Hawai'i 96813 • 808-954-6161 • [blueplanetfoundation.org](http://blueplanetfoundation.org)

Hawai'i residents and businesses pay the highest electricity rates in the nation,<sup>1</sup> which exacerbates our already high cost of living. Appliance efficiency standards are a low-hanging-fruit policy that can provide economic relief to Hawai'i's small businesses and struggling families.

Estimates show that if Hawai'i passed this bill with an effective date of 2025, **by 2030, Hawai'i households and businesses would be saving \$11 million annually on their utility bills. By 2040, this number would increase to an annual savings of \$24 million.**

Furthermore, the majority of the products in HB 194 have **no incremental cost**, meaning that they don't cost more than inefficient models and **consumers will start saving right away**. For other appliances, like air purifiers and portable electric spas, utility bill savings pay back the small incremental cost of products meeting the standards within six months. After that, savings accrue to the consumers over the lifetime of the product.

The table below was produced by a non-profit research association, the Appliance Standards Awareness Project, to provide a Hawai'i-specific breakdown on annual utility bill savings and incremental costs for products considered in this bill:

	Potential annual utility bill savings (million 2021\$)		Net present value savings (million 2021\$)	Benefit-cost ratio	Payback period (years)
	In 2030	In 2040			
Air purifiers	5.1	8.5	62.8	15.2	0.5
Electric vehicle supply equipment	0.5	3.3	20.1	no cost	0.0
Portable electric spas	2.2	3.8	27.3	11.6	0.6
Residential ventilating fans	0.4	1.2	8.1	no cost	0.0
Toilets (water closets)	1.4	4.2	36.0	no cost	0.0
Urinals	0.9	2.2	16.0	no cost	0.0
Water coolers	0.4	0.8	6.3	no cost	0.0
<b>Total</b>	<b>11</b>	<b>24</b>	<b>177</b>	<b>26.3</b>	--

Assuming a compliance date of 2025 for all the recommended standards. Net present value savings take into account both utility bill savings and estimated impacts on product costs for items sold between 2025 and 2040. Totals may not sum due to rounding. The total benefit-cost ratio is calculated as the present value of the total utility bill savings from products sold through 2040 for the package of recommended standards divided by the present value of the total additional costs. Urinal savings were estimated using a standard case of 0.125 gallons per flush and weighted for the availability of wall-mounted urinal models found in the Modernized Appliance Efficiency Database System (MAEDbS).

## States are already leading the way on appliance standards

The standards referenced in HB 194 are also easily implementable for the government agency tasked with oversight. This is because: (1) the standards are applicable to readily available

<sup>1</sup>Compton, Sophia. "Hawaii has the highest electric bills nationwide in 2022, report finds." *Pacific Business News*. January 6, 2023. (<https://www.bizjournals.com/pacific/news/2023/01/06/hawaii-had-highest-electric-bills-nationwide.html>)

products—i.e. products and technologies meeting the standards are readily available today from multiple manufacturers, and (2) other states have already done the lion’s share of work to set the appropriate standards and shift manufacturers’ behavior and compliance.

The proposed standards are largely modeled after standards adopted in other states, meaning that the manufacturers have already adapted to the testing, certification, and labeling requirements for selling energy and water efficient products across the country. As a reference, the following number of states have already adopted efficiency standards for the products included in this bill: standards for EV supply equipment have been adopted in 4 states, air purifiers in 5 states, residential ventilating fans in 9 states, urinals in 12 states, toilets in 13 states, water coolers in 13 states, and standards for portable electric spas have been adopted in 14 states.<sup>2</sup> Consequently, Hawai‘i can merely piggyback off of these standards for **easy implementation without a heavy lift for the local government agency tasked with oversight.**

## Preventing carbon emissions to help meet our climate goals

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Climate change will have devastating, long-term consequences on Hawai‘i’s environment, economy, and quality of life. For these reasons and others, the State of Hawai‘i has committed to a decisive transition away from fossil fuels. The legislature has passed aggressive carbon reduction goals, including a mandate to achieve 100% renewable electricity by 2045 (Act 97 of 2015), and a goal to be carbon-negative by 2045 (Act 15 of 2018), with an interim goal to achieve a 50% reduction from 2005 levels by 2030 (Act 238 of 2022).

Embracing energy efficiency measures is an important part of addressing climate change and reducing carbon emissions. In fact, adopting state appliance efficiency standards is a priority initiative for the U.S. Climate Alliance to accelerate climate action.<sup>3</sup>

Expanding Hawai‘i’s list of products with appliance standards would significantly aid our collective efforts to achieve a carbon-negative, clean energy future. Cumulatively through 2040, the standards set forth in this bill would **save 552 gigawatt hours of electricity and 3 billion gallons of water, as well as avoid 281,500 metric tons of carbon dioxide, 795 tons of nitrogen oxide, and 1,230 tons of sulfur dioxide pollution.**

## Conclusion

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As Hawai‘i progresses toward achieving its 100% renewable energy and decarbonization goals, energy efficiency remains the quickest, cheapest, and cleanest way to reduce emissions from the electricity sector, while providing financial benefits to Hawai‘i residents and businesses during the transition. Numerous states have adopted standards for all of the products proposed

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<sup>2</sup> “State Standards: State Adoption of Energy Efficiency Standards.” *Appliance Standards Awareness Project*. (<https://appliance-standards.org/states#states-table>)

<sup>3</sup> See <https://www.usclimatealliance.org/about-initiatives/>.

in this bill, and Hawai'i's past experience with appliance standards have already proven to be a cost-effective and easily implementable policy. Furthermore, as more states adopt similar legislation and lead the way to an energy efficient economy, the states without appliance standards become a dumping ground for inefficient products that suppliers cannot sell elsewhere. As a result, Blue Planet strongly supports expanding Hawai'i's list of appliance efficiency standards by adding the products included in HB 194.

Thank you for the opportunity to provide testimony.





February 8, 2023

Chairwoman Lowen  
Vice-Chair Cochran

**RE: HB 194 – Relating to efficiency standards (“Appliance efficiency standards”)**

Dear Members of the House Committee on Energy and Environmental Protection:

Please accept this testimony on behalf of the Appliance Standards Awareness Project (ASAP). We are a project of the American Council for an Energy Efficient Economy (ACEEE) dedicated to advancing cost-effective appliance and lighting standards at both the national and state level.

Our organization, along with ACEEE, conducted the research and analysis upon which HB 194 is based. In 2017, we published a joint report, *States Go First: How States Can Save Consumers Money, Reduce Energy and Water Waste, and Protect the Environment with New Appliance Standards*, and created savings analyses for each state which have been updated annually.<sup>1</sup> We would be happy to provide additional information about this analysis as well as the products and standards covered by HB 194.

**HB 194 WOULD SAVE MONEY, ENERGY, AND AVOID GREENHOUSE GASES**

The bill would set minimum energy or water efficiency standards for seven products. If adopted, our analysis shows these standards would save Hawaii residents and businesses \$24 million annually on utility bills by 2040.<sup>2</sup> Additionally, by 2040 Hawaii could cumulatively save 552 gigawatt hours of electricity while avoiding 281,000 metric tons of CO<sub>2</sub> emissions.

**THE PROPOSED STANDARDS ARE COST EFFECTIVE, PRODUCTS READILY AVAILABLE**

Five of the products in the bill have zero payback period, meaning the more efficient products are available at the same price and savings begin right away. The remaining two products, portable electric spas (aka hot tubs) and air purifiers, have payback periods of six months or less. Additionally, products meeting the standards are readily available today from multiple manufacturers.

**HB 194 WOULD CONTINUE HAWAII’S LEADERSHIP ON APPLIANCE STANDARDS**

In 2019, Hawaii passed efficiency standards for five products, becoming one of the first states in the nation to do so and putting the state on the path toward saving millions of dollars from decreased utility bills. Since then, 12 other states have also adopted appliance standards, creating a “strength in numbers” effect that is helping states with the implementation of standards.<sup>3</sup>

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<sup>1</sup> For the 2017 ASAP/ACEEE report and subsequent updates, see:  
<https://appliance-standards.org/document/report-overview-states-go-first>

<sup>2</sup> See 2023 Hawaii Appliance Standards Savings Analysis at the end of these comments.

<sup>3</sup> Washington, Oregon, California, Nevada, Colorado, New York, New Jersey, Maryland, Rhode Island, Massachusetts, Maine, and Vermont.



**STANDARDS ARE A COST-EFFECTIVE WAY TO ACHIEVE STATE GOALS**

Adopting efficiency standards is a low-cost way for Hawaii to cut energy waste, reduce electricity bills, and reduce greenhouse gases – helping the state meet its clean energy, energy efficiency, and affordability goals.

We would be happy to provide further information, answer questions about appliance standards, or provide technical assistance should such a need arise.

Sincerely,

A handwritten signature in cursive script that reads "Brian Fadie".

Brian Fadie, State Policy Manager  
Appliance Standards Awareness Project

Appliance Standards Awareness Project

2023 State Appliance Standards Recommendations

Savings estimates for: **Hawaii**

	Potential annual savings in 2030						Potential annual savings in 2040					
	Electricity (GWh)	Natural gas (BBtu)	Water (million gallons)	NO <sub>x</sub> (tons)	SO <sub>2</sub> (tons)	CO <sub>2</sub> (thous. MT)	Electricity (GWh)	Natural gas (BBtu)	Water (million gallons)	NO <sub>x</sub> (tons)	SO <sub>2</sub> (tons)	CO <sub>2</sub> (thous. MT)
Air purifiers	16.0	--	--	27.6	42.0	8.9	26.1	--	--	31.9	50.4	12.0
Electric vehicle supply equipment	1.5	--	--	2.6	4.0	0.8	10.1	--	--	12.3	19.4	4.6
Portable electric spas	6.9	--	--	12.0	18.2	3.9	11.6	--	--	14.3	22.5	5.4
Residential ventilating fans	1.3	--	--	2.3	3.5	0.7	3.6	--	--	4.4	6.9	1.7
Toilets (water closets)	--	--	83	--	--	--	--	--	219	--	--	--
Urinals	--	--	54	--	--	--	--	--	117	--	--	--
Water coolers	1.6	--	--	2.7	4.2	0.9	2.9	--	--	3.5	5.6	1.4
<b>Total</b>	<b>27</b>	<b>--</b>	<b>136</b>	<b>47</b>	<b>72</b>	<b>15</b>	<b>54</b>	<b>--</b>	<b>337</b>	<b>66</b>	<b>105</b>	<b>25</b>

Assuming a compliance date of 2025 for all the recommended standards. Totals may not sum due to rounding. Urinal savings were estimated using a standard case of 0.125 gallons per flush and weighted for the availability of wall-mounted urinal models found in the Modernized Appliance Efficiency Database System (MAEDbS).

Savings estimates for: **Hawaii**

	Potential annual utility bill savings (million 2021\$)		Net present value savings (million 2021\$)	Benefit-cost ratio	Payback period (years)
	In 2030	In 2040			
Air purifiers	5.1	8.5	62.8	15.2	0.5
Electric vehicle supply equipment	0.5	3.3	20.1	no cost	0.0
Portable electric spas	2.2	3.8	27.3	11.6	0.6
Residential ventilating fans	0.4	1.2	8.1	no cost	0.0
Toilets (water closets)	1.4	4.2	36.0	no cost	0.0
Urinals	0.9	2.2	16.0	no cost	0.0
Water coolers	0.4	0.8	6.3	no cost	0.0
<b>Total</b>	<b>11</b>	<b>24</b>	<b>177</b>	<b>26.3</b>	<b>--</b>

Assuming a compliance date of 2025 for all the recommended standards. Net present value savings take into account both utility bill savings and estimated impacts on product costs for items sold between 2025 and 2040. Totals may not sum due to rounding. The total benefit-cost ratio is calculated as the present value of the total utility bill savings from products sold through 2040 for the package of recommended standards divided by the present value of the total additional costs. Urinal savings were estimated using a standard case of 0.125 gallons per flush and weighted for the availability of wall-mounted urinal models found in the Modernized Appliance Efficiency Database System (MAEDbS).

### Cumulative savings estimates for: **Hawaii**

	Potential cumulative savings through 2040					
	Electricity (GWh)	Natural gas (Tbtu)	Water (billion gallons)	NO <sub>x</sub> (tons)	SO <sub>2</sub> (tons)	CO <sub>2</sub> (thous. MT)
Air purifiers	300	--	--	436.1	674.2	153.3
Electric vehicle supply equipment	57	--	--	77.9	121.1	28.1
Portable electric spas	132	--	--	192.1	297.2	67.5
Residential ventilating fans	30	--	--	43.2	66.9	15.3
Toilets (water closets)	--	--	1.9	--	--	--
Urinals	--	--	1.2	--	--	--
Water coolers	32	--	--	45.8	70.9	17.3
<b>Total</b>	<b>552</b>	<b>--</b>	<b>3</b>	<b>795</b>	<b>1,230</b>	<b>281</b>

Assuming a compliance date of 2025 for all the recommended standards. Totals may not sum due to rounding. Urinal savings were estimated using a standard case of 0.125 gallons per flush and weighted for the availability of wall-mounted urinal models found in the Modernized Appliance Efficiency Database System (MAEDbS).

### Per-unit savings estimates for: **Hawaii**

	Average lifetime (years)	Per-unit incremental cost (2021\$)	Per-unit annual savings		Per-unit annual utility bill savings in 2025 (2021\$/yr)
			Electricity (kWh/yr)	Water (gallons/yr)	
Air purifiers	9	36	117	--	37.14
Electric vehicle supply equipment	16	0	30	--	9.52
Portable electric spas					
<i>standard/exercise/combination</i>	10	121	464	--	99.53
<i>inflatable</i>	3	108	1,311	--	281.37
Residential ventilating fans	15	0	14	--	4.57
Toilets (water closets)					
<i>residential</i>	25	0	--	861	15.00
<i>commercial</i>	12	0	--	488	7.53
Urinals	12	0	--	4,095	63.17
Water coolers	10	0	92	--	25.96

Urinal savings were estimated using a standard case of 0.125 gallons per flush and weighted for the availability of wall-mounted urinal models found in the Modernized Appliance Efficiency Database System (MAEDbS).



February 8, 2023

Representative Nicole E. Lowen  
Hawaii State Capitol  
415 South Beretania Street  
Room 425  
Honolulu, HI 96813  
[replowen@capitol.hawaii.gov](mailto:replowen@capitol.hawaii.gov)

**PMI 2023  
Board of  
Directors**

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LIXIL  
President**

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Industries  
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KEROX LTD**

**Bob Neff  
Delta Faucet Co.**

**Daniel  
Gleiberman  
Sloan Valve Co.**

**Kevin Campbell  
MOEN**

**RE: RE: Hawaii HB 194 – An Act Relating to Efficiency Standards**

Dear Chair Lowen and Members of the House Committee on Energy & Environmental Protection:

Plumbing Manufacturers International (PMI) appreciates the opportunity to provide comments regarding Hawaii HB 116, that your committee will be considering on February 2<sup>nd</sup>, that looks to modify the definition for “showerhead” and creates a new position “Chief Energy Officer” to administer and enforce the state’s appliance efficiency standards.

Regarding the proposed bill, PMI has the following concerns (**Please note:** PMI’s proposed text changes are indicated in **red**):

- In Section 2, for consistency with the definitions in the national standards that address plumbing fixtures and fittings (i.e., ASME A112.18.1/CSA B125.1 “Plumbing Fittings” and ASME A112.19.2/CSA B45.1 “Ceramic Plumbing Fixtures”). PMI recommends revising the definitions of showerhead and water closet as follows:

~~“Toilet” or “water closet” means a plumbing fixture that includes~~ **with** a water—containing receptor that ~~is designed to receive~~ **liquid and solid human body waste and on actuation conveys the** waste through an exposed integral trap into a drainage system. “Toilet” or “water closet” includes but is not limited to a dual—flush toilet.

~~“Showerhead” means~~ **an accessory to a supply fitting for spraying water onto a bather typically from an overhead position** ~~a device through which water is discharged for a shower bath. Showerhead includes any showerhead, including a handheld showerhead, except a safety showerhead.~~

- In Section 3 (2), the text as proposed appears to permit the chief energy officer to increase the efficiency standards without any public input at all. Such changes could have a significant, long-term impact on the health and safety of the public, and should be required to, at a minimum, seek public input. Any amendment to efficiency standards should provide for a public input period of no less than 45 days which is the common practice in many states. PMI recommends revising the new text as follows:

(2) Adopt or amend efficiency standards for any products as the chief energy officer deems appropriate, including but not limited to those products listed or incorporated in section 196—84(a); provided that the chief energy officer shall set efficiency standards upon a determination that new or increased efficiency standards would serve to promote energy or water conservation in the State, **would not jeopardize health and safety**, and would be cost—effective for consumers who newly purchase and use those products; provided further that **the chief energy officer seeks public input on any amendment to efficiency standards for a period of no less than 45 days and** no new or increased efficiency standards shall become effective within one year following the adoption of any amended regulations establishing the increased efficiency standards."

- In Section 5 (10), the flush volume for all urinals should be changed to 0.5 gallons per flush (gpf) to be consistent with EPA WaterSense® program requirements that have been vetted through a consensus process to ensure that such fixtures function safely and effectively. Such a requirement will ensure that urinals are not only 50% more water efficient than federal regulations (or what is currently permitted in Hawaii at 1.0 gpf), but are also required to meet high performance standards. For urinals and water closets located in prisons or mental health care facilities, such fixtures must flush more water per flush in order to ensure the safety of facility personnel. It is common in such facilities for inmates and patients to vandalize such fixtures by clogging them, which requires attention from facility personnel that puts their safety at risk. Finally, the reference to 10 CFR should be consistent with how it is reference in the eCFR system. The eCFR Webpage can be accessed through the url address: <https://www.ecfr.gov/current/title-10/chapter-II/subchapter-D/part-430/subpart-B/appendix-Appendix%20S%20to%20Subpart%20B%20of%20Part%20430>

(10) Toilets, also known as water closets, and urinals, other than those designed and marketed exclusively for use at prisons or mental health facilities, shall meet the standards shown in subparagraphs (A) to (D) when tested in accordance with **10 CFR title 10 Code of Federal Regulations Part 430, appendix T to subpart B of Part 430**, — "Uniform Test Method for Measuring the Water Consumption of Water Closets and Urinals" — ...

(A) Wall—mounted urinals, except for trough—type urinals **and urinals designed and marketed exclusively for use in prisons and mental health care facilities**, shall have a maximum flush volume of ~~0.125~~ **0.5** gallons per flush;

(B) Floor—mounted urinals, except for trough-type urinals **and urinals designed and marketed exclusively for use in prisons and mental health care facilities**, shall have a maximum flush volume of 0.5 gallons per flush;

(C) Toilets, except for dual-flush tank—type toilets **and toilets designed and marketed exclusively for use in prisons or mental health care facilities**, shall have a maximum flush volume of 1.28 gallons per flush; and

(D) Dual—flush tank—type toilets shall have a maximum dual—flush effective flush volume of 1.28 gallons per flush. As used in this subparagraph, "dual-flush effective flush volume" means the average flush volume of two reduced flushes and one full flush; and

- In Section 6 (b), the existing text is unclear as to the meaning of the term "new" (i.e. ..., no "new" air purifier, electric vehicle ....). From the perspective of a manufacturer "new" products are that which are newly produced. However, it is also understood that from the perspective of a consumer a "new" product could be one which is on the shelf and is purchased new from a store. PMI's suggested revision of this text included below is intended to clarify the meaning of the term "new" (i.e. that

which is identified through a specific manufacturing date). This revision will also permit the sell through of local inventoried product to ensure that retailers and distributors (including local hardware stores) have sufficient time to vend existing stock without incurring excessive costs or hardship.

(b) On or after January 1, 2025, no new air purifier, electric vehicle supply equipment, portable electric spa, residential ventilating fan, toilet, urinal, or water cooler **that is manufactured on or after January 1, 2025**, may be sold or offered for sale, lease, or rent in the State unless the efficiency of the new product meets or exceeds the efficiency standards provided in section 196—85.

PMI is an international, U.S.-based trade association representing manufacturers that provide 90% of the plumbing products sold in the United States. We have made the promotion of water safety and efficiency a top priority and have included this in our mission statement<sup>1</sup>. PMI's members are industry leaders in producing safe, reliable and innovative water efficient plumbing technologies and have supported the U.S. EPA WaterSense® program since its inception. **In Hawaii, plumbing manufacturers contribute \$234 million to the economy, provide more than 1,550 jobs (direct and indirect) and generate \$74.8 million in wages.**

Thank you for considering our comments. If you have any questions regarding our comments, please do not hesitate to contact me.

Sincerely,



Kyle Thompson  
Technical Director  
Plumbing Manufacturers International  
Office: 847-217-7212  
[kthompson@safep plumbing.org](mailto:kthompson@safep plumbing.org)

cc: Members

**PMI Members**

\*Bradley Corporation \*Brasscraft Manufacturing Company \*CSA Group \*Delta Faucet Company \*Dornbracht Americas, Inc. \*Duravit USA, Inc.  
\*Fisher Manufacturing Company \*Elkay Manufacturing Company \*Fluidmaster, Inc. \*Gerber Plumbing Fixtures, LLC \*Hansgrohe, Inc.  
\*Haws Corporation \*IAPMO \*International Code Council – Evaluation Service (ICC-ES) \*KEROX LTD \*Kohler Company  
\*Lavelle Industries, Inc. \*LIXIL \*MOEN \*NEOPERL, Inc. \*NSF International \*Pfister  
\*Reliance Worldwide Corporation \*Similor AG \*Sloan Valve Company \*Speakman Company  
\*Sprite \*Symmons Industries, Inc. \*T & S Brass and Bronze Works, Inc. \*TOTO USA \*UL, LLC  
\*Uponor \*Viega, LLC \*Water Pick, Inc. \*WCM Industries, Inc.

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<sup>1</sup> PMI's Mission: To promote the water efficiency, health, safety, quality and environmental sustainability of plumbing products while maximizing consumer choice and value in a fair and open marketplace. To provide a forum for the exchange of information and industry education. To represent openly the members' interests and advocate for sound environmental and public health policies in the regulatory/legislative processes. To enhance the plumbing industry's growth and expansion.



9 February 2023

Committee on Energy and Environmental Protection  
Conference Room 309  
State Capitol  
415 South Beretania Street  
Honolulu, Hawaii 96813

RE: Comments on HB194, Relating to Efficiency Standards

Dear Committee Members:

The Home Ventilating Institute (“HVI”) is an ISO 17065 compliant certification body and a trade association representing over 100 manufacturers located in North America, South America, Asia, and Europe. Our manufacturer members provide the residential and light commercial ventilating products that deliver essential indoor air quality to homes and businesses throughout North America. HVI is pleased to partner with Hawaii on the new standards for Residential Ventilating Fans (“RVFs”). HVI certifies RVFs, ensuring that consumers and builders can choose high-performing, energy-efficient appliances. HVI’s outstanding record in providing certification in this area resulted in the Hawaii choosing HVI’s Publication 916, “HVI Airflow Test Procedure,” as the testing standard for RVFs in the proposed Efficiency Standards.

HVI offers comment on the certification process and labeling requirements in HB194.

#### **Use of HVI’s Certified Product Directory to Meet Certification and Labeling Requirements**

Under Hawaii’s current law, any product listed in California’s Modernized Appliance Efficiency Database System (CA MAEDbS) is “deemed to be in compliance” with provisions requiring manufacturers to “certify and label products,” HRS § 196-88. However, the CA MAEDbS lists not only RVFs that comply with Hawaii’s law but also products that do not comply. To support compliance with Hawaii law, identifying a clearer method of determining compliant products is advisable.

***Advancing the Value of Residential Ventilation for Healthier Living®***



In addition to recognizing CA MAEDBs, Hawaii law also allows that the “certification and labeling programs of other states and federal agencies” may establish compliance with the certification and labeling requirements for regulated products in Hawaii. HRS § 196-88. As an ISO accredited certification body of RVFs, HVI is uniquely positioned to communicate compliance with Hawaii’s new RVF standards. Given that HVI’s testing procedure is an element of compliance, and that HVI maintains a “certification and labeling program” referenced by another state (namely, Vermont), HVI requests that HVI’s Certified Products Directory (<https://www.hvi.org/hvi-certified-products-directory/>) be explicitly recognized as a certification program by the State of Hawaii under HRS § 196-88. If Hawaii accepts HVI’s Certified Products Directory as a certification program under HRS § 196-88, HVI will add a field to its Directory for directly determining Hawaii compliance. See the screenshot below from Section I of HVI’s Directory for an example of how HVI communicates compliance with a state’s (i.e., Vermont’s) RVF performance requirements.

**HVI Publication 911: Certified Home Ventilating Products Directory**®  
Section I - Complete Product Listing

Please note that Model Numbers are shown with spaces and dashes removed in order to facilitate the sorting function within the directory.

\* Some HVI-Certified Models are also ENERGY STAR-rated as indicated by a "Yes" in the "ENERGY STAR" column. This field is provided for information only. To confirm the current ENERGY STAR listings, visit the [Ventilating Fans Product Finder](#).

Save HVI Product Directory as a spreadsheet

Search:

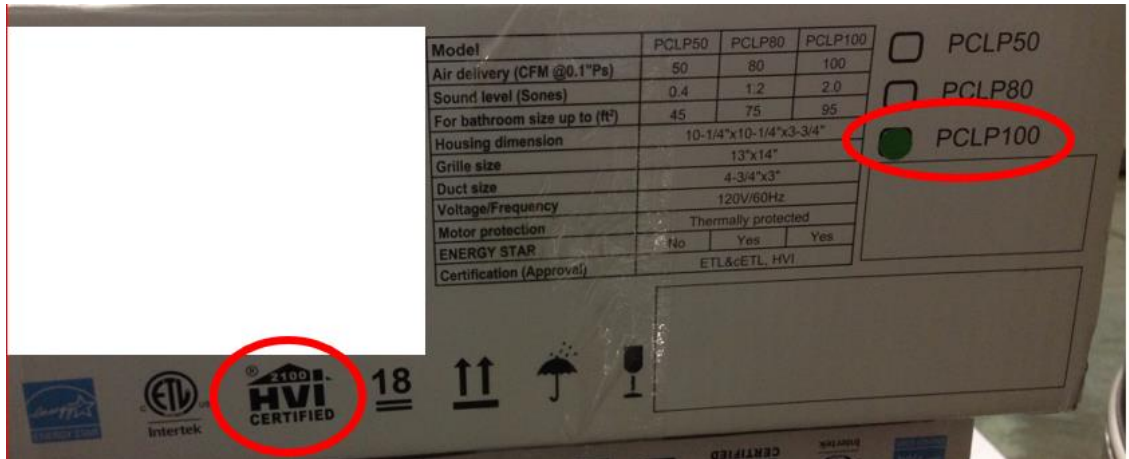
Product Category	Product Subcategory	Brand Owner	Brand Name	Model	Rated Airflow (cfm)	Rated Sound (Sones)	Input Power (Watts)	* Energy Star	Meets Vermont Efficiency Reqs
Bathroom Exhaust Fans		Homewerks Worldwide, LLC	Homewerks Worldwide	7140-50-G3	50	1	17	No	
Bathroom Exhaust Fans		Homewerks Worldwide, LLC	Homewerks Worldwide	7140-50-G3	27			No	No
Bathroom Exhaust Fans		Homewerks Worldwide,	Homewerks Worldwide	7140-80-G3	80	1.5	28	Yes	Yes

### About the HVI Certified Products Directory

HVI accepts for listing in its Certified Products Directory only those RVFs which have been tested using the HVI Airflow Test Procedure in laboratories approved by HVI in accordance with ISO 17065. HVI also verifies the test results of listed products using a third-party lab accredited in accordance with ISO 17025. HVI selects 10% of each of its members' products in each category for annual verification. As an accredited certification body, HVI is accountable to the American National Standards Institute.

Each HVI certified product is already labeled as such, and a regulator, retailer, installer, or consumer will be able to easily confirm, by looking up the model number on the product packaging (see image below for an example) within the HVI Certified Products Directory, whether the product complies with Hawaii’s RVF standards.

***Advancing the Value of Residential Ventilation for Healthier Living®***



HVI is eager to support Hawaii’s Efficiency Standards through clearly communicating to the Hawaii State Energy Office and the general public whether a listed RVF is certified as complying with Hawaii’s requirements. We hope that the Committee will consider our recommendation, and we would be glad to discuss these matters further should you have any questions. Please feel free to reach out to Matt Matheny, HVI Engineering Director, at [iaq@hvi.org](mailto:iaq@hvi.org).

Respectfully submitted,

Jacki Donner, HVI CEO

**HB-194**

Submitted on: 2/3/2023 10:40:42 AM

Testimony for EEP on 2/9/2023 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Andrew Crossland	Individual	Support	Written Testimony Only

Comments:

I support this Bill.

**HB-194**

Submitted on: 2/3/2023 5:09:11 PM

Testimony for EEP on 2/9/2023 9:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Wyatt McHale	Individual	Support	Written Testimony Only

Comments:

**To the Committee on Energy & Environmental Protection,**

**My name is Wyatt McHale. I am a student at UH Manoa and a lifelong resident of the North Shore of O‘ahu. I am testifying to support House Bill No. 194 and its aim to enforce energy efficiency standards for household appliances and products in Hawai‘i. As we continue to feel the impacts of climate change in Hawai‘i, the importance of sustainability and environmental protection in Hawai‘i cannot be overstated. Adopting policies that promote energy conservation will both reduce Hawai‘i’s carbon footprint and limit the use of inefficient energy sources that contribute to environmental degradation.**

**We all know that the cost of living in Hawai‘i is extremely high. For people of my generation housing affordability is for the most part unattainable. In addition to high rental or mortgage costs, energy bills are an additional stressor. For a household of 7, my family sometimes pays upwards of \$700 in utility bills each month. Implementing minimum efficiency standards on certain household products will help mitigate the high cost of living in Hawai‘i. Minimum energy efficiency standards will significantly lower Hawai‘i’s utility bills and result in almost \$170,000,000 in total utility bill savings in the next 15 years. The millions of dollars of potential savings on energy bills statewide will provide some much needed relief for local households and businesses. Additionally, residents and businesses will have more funds which will be used to stimulate the local economy.**

**Authorizing the Chief Energy Officer of the State of Hawai‘i to be in charge of enforcing minimum energy standards ensures that energy conservation efforts will not fall to the wayside of business, development, and tourism sectors. This bill provides a much needed framework to ensure that Hawai‘i is on track to meet its clean energy and climate mitigation goals. As a resident of Hawai‘i I believe that energy conservation and efficiency will only become more important in the coming years. This is why I am supporting House Bill No. 194 to guarantee that the products and appliances we use in our homes are energy efficient, environmentally friendly, and cost effective.**

**Thank you for your time and consideration.**

**HB-194**

Submitted on: 2/6/2023 2:37:20 AM

Testimony for EEP on 2/9/2023 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Robin Miyajima	Individual	Support	Written Testimony Only

Comments:

I support the introduction of minimum efficiency standards. I think this would help our state to be more efficient.

**HB-194**

Submitted on: 2/6/2023 12:20:04 PM

Testimony for EEP on 2/9/2023 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Brodie Lockard	Individual	Support	Written Testimony Only

Comments:

I support HB194.

**HB-194**

Submitted on: 2/6/2023 12:39:27 PM

Testimony for EEP on 2/9/2023 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Keala Dickhens	Individual	Support	Written Testimony Only

Comments:

Hawaii residents and businesses pay the highest electricity rates in the nation. Efficiency standards ensure that the appliances being sold in Hawaii use less energy and water while ensuring quality, affordability, and progress toward our climate goals. By adding seven new products — such as air purifiers, toilets, and EV charging equipment — Hawai‘i consumers and businesses can save an estimated \$24 million in annual utility bills by 2040, while reducing air pollutants, GHG emissions, and saving precious water. Best of all, most of the proposed products don’t cost any more than the current inefficient models, so consumers will start saving right away.

**HB-194**

Submitted on: 2/6/2023 1:14:44 PM

Testimony for EEP on 2/9/2023 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
B.A. McClintock	Individual	Support	Written Testimony Only

Comments:

Because Hawai‘i residents and businesses pay the highest electricity rates in the nation, it's important that there are standards in place to ensure that the appliances sold in the state are energy efficient.

The energy, water, and economic savings from this energy efficiency measure are a win for the state, taxpayers, and our climate.

Affordability is at the heart of this measure, which is very important for Hawai‘i families and businesses, now more than ever.

The bill does not require changing out existing products. It means that when new products are purchased, the versions available are more efficient.

The standards proposed have already been adopted in other states, and without a similar update to the standards in Hawai‘i. We risk being a dumping ground for inefficient products manufacturers can't sell in other states.

Embracing energy efficiency is a critical part of addressing climate change and reducing carbon emissions.



**HB-194**

Submitted on: 2/6/2023 3:04:25 PM

Testimony for EEP on 2/9/2023 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Sarah Daigle	Individual	Support	Written Testimony Only

Comments:

This makes absolute sense, helping the earth, and helping residents/state save money is a win win.

**HB-194**

Submitted on: 2/6/2023 4:18:19 PM

Testimony for EEP on 2/9/2023 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Pili Valderrama	Individual	Support	Written Testimony Only

Comments:

Aloha Chair Lowen, Vice Chair Cochran, and members of the Committee,

I am testifying in support of House Bill 194, which expands the list of household products sold in Hawai‘i that meet minimum energy and water efficiency standards.

- Because Hawai‘i residents and businesses pay the highest electricity rates in the nation, it's important that there are standards in place to ensure that the appliances sold in the state are energy efficient. and
- Embracing energy efficiency is a critical part of addressing climate change and reducing carbon emissions.

Energy efficiency will play a critical role in reaching the state's 100% clean energy requirement by 2045. In 2019, Hawaii adopted efficiency standards for five products. Since then, 12 other states have also adopted standards, including for the seven products in HB 194.

By expanding Hawai‘i’s list of efficiency standards, Hawai‘i residents and businesses are estimated to save \$24 million on utility bills, 54 gigawatt hours of electricity, and 25,000 metric tons of carbon emissions—each and every year by 2040. In addition, most of the products included in this bill don’t cost more than the inefficient models, so consumers will start seeing savings right away.

Please pass HB 194 to support affordability for Hawai‘i's families and businesses and significantly reduce air pollutants, carbon emissions, and save freshwater resources for the future for our islands.

Thank you for the opportunity to submit testimony in support of HB 194.

Maria del Pilar Valderrama Castro

Honolulu, HI 96814

**HB-194**

Submitted on: 2/6/2023 5:05:35 PM

Testimony for EEP on 2/9/2023 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Camile Cleveland	Individual	Support	Written Testimony Only

Comments:

Aloha - I am writing in strong support of HB194 which would expand the list of products in the state that have that have minimum energy and water efficiency standards. Minimum efficiency standards are a proven tool to lowering energy usage, thus lowering energy costs for residents and reducing the state's levels of air pollutants, carbon emissions, and water usage. Most of the proposed products are the same cost as current inefficient models.

I work in the climate policy sector, and have seen that energy efficiency is often not given as much attention as other more exciting, innovative solutions such as renewable energy and electric vehicles - however it is a critically important piece of addressing the climate crisis, and will reduce energy costs for the people of Hawai'i, who currently pay the highest energy rates in the United States.

Mahalo for the opportunity to testify.

**HB-194**

Submitted on: 2/6/2023 8:03:55 PM

Testimony for EEP on 2/9/2023 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Lei-Anne Jones	Individual	Support	Written Testimony Only

Comments:

Aloha Chair Lowen, Vice Chair Cochran, and members of the Committee,

I am testifying in support of House Bill 194, which expands the list of household products sold in Hawai‘i that meet minimum energy and water efficiency standards.

Energy efficiency will play a critical role in reaching the state's 100% clean energy requirement by 2045. In 2019, Hawaii adopted efficiency standards for five products. Since then, 12 other states have also adopted standards, including for the seven products in HB 194.

By expanding Hawai‘i’s list of efficiency standards, Hawai‘i residents and businesses are estimated to save \$24 million on utility bills, 54 gigawatt hours of electricity, and 25,000 metric tons of carbon emissions—each and every year by 2040. In addition, most of the products included in this bill don’t cost more than the inefficient models, so consumers will start seeing savings right away.

Please pass HB 194 to support affordability for Hawai‘i's families and businesses and significantly reduce air pollutants, carbon emissions, and save freshwater resources for the future for our islands.

Thank you for the opportunity to submit testimony in support of HB 194.

Lei-Anne Jones, Honolulu, HI 96822

**HB-194**

Submitted on: 2/7/2023 11:53:07 AM

Testimony for EEP on 2/9/2023 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Alena Huffine	Individual	Support	Written Testimony Only

Comments:

Aloha Chair Lowen, Vice Chair Cochran, and members of the Committee,

I am testifying in support of House Bill 194, which expands the list of household products sold in Hawaii to include seven additional products that meet minimum energy and water efficiency standards.

With the issues facing our community regarding Red Hill, water conservation is of the utmost importance. Our community is fighting hard to have clean drinking water and to protect our aquifers and this bill would help support Hawaii's efficiency goals by adding toilets and urinals to the list of products that meet efficient standards. Several other states, including California, have already adopted these standards. If this bill were passed, Hawaii could save potentially 337 million gallons of water and 25,000 metric tons of carbon emissions through 2040. Our stores are already primarily selling these efficient models (toilets and urinals), which cost around the same as inefficient models. However, if we don't adopt these standards, we risk Hawaii being the dumping ground for inefficient products manufacturers can't sell in other states which have already adopted these standards. Water-efficient toilets use 20% less water than the current federal standard and water-efficient urinals use 50% less water than the federal standard. This bill does not require changing out existing products but it does require that when new products are purchased, the only available measures will be more efficient.

Help Hawaii reach it's sustainability goals. Please pass HB 194 to support affordability for Hawaii's families and businesses, and significantly reduce water usage and carbon emissions for future generations.

Thank you for the opportunity to submit testimony in support of HB 194.

Sincerely,

Alena Huffine, Kahuku, HI 96731

**HB-194**

Submitted on: 2/8/2023 8:32:11 AM

Testimony for EEP on 2/9/2023 9:00:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Severine Busquet	Individual	Support	Written Testimony Only

Comments:

Aloha Chair Lowen, Vice Chair Cochran, and members of the Committee,

I am testifying in support of House Bill 194, which expands the list of household products sold in Hawai‘i that meet minimum energy and water efficiency standards.

Efficiency of our appliances is a key part to reduce our electricity and water consumption which is essential to decrease people’s electricity bills and our impact on the climate.

Energy efficiency will play a critical role in reaching the state's 100% clean energy requirement by 2045. In 2019, Hawaii adopted efficiency standards for five products. Since then, 12 other states have also adopted standards, including for the seven products in HB 194.

By expanding Hawai‘i’s list of efficiency standards, Hawai‘i residents and businesses are estimated to save \$24 million on utility bills, 54 gigawatt hours of electricity, and 25,000 metric tons of carbon emissions—each and every year by 2040. In addition, most of the products included in this bill don’t cost more than the inefficient models, so consumers will start seeing savings right away.

Please pass HB 194 to support affordability for Hawai‘i's families and businesses and significantly reduce air pollutants, carbon emissions, and save freshwater resources for the future for our islands.

Thank you for the opportunity to submit testimony in support of HB 194.

Severine Busquet

Honolulu, 96825