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April 28, 2015

Via E-mail

The Honorable Jessica Vega Pederson  
Chair  
House Committee on Energy & Environment  
900 Court Street, NE  
Salem, Oregon 97301

beth.patrino@state.or.us

Re: Proposed Amendment to SB 20 – *Relating to minimum energy efficiency standards*

Dear Chair Vega Pederson:

The Association of Home Appliance Manufacturers (AHAM) appreciates the opportunity to propose an amendment to SB 20, a bill relating to minimum energy efficiency standards. AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

Current Oregon law includes a provision establishing a minimum energy standard for commercial clothes washers (modified energy factor of 1.26 and water consumption factor of 9.5). Federal law preempts Oregon law in this area (See 42USC6316 which references and adopts the preemption for Residential products at 42USC6297). Oregon cannot establish energy standards for commercial clothes washers (neither more nor less stringent). As a result, to eliminate confusion and to prevent wasted time and resources spent to clarify any confusion, AHAM recommends SB 20 delete commercial clothes washers from the Oregon law. In order to highlight this concern of confusion, although the current federal standards are an MEF of 1.35 and WF of 8.5 for Top-loading and MEF of 2.00 and WF of 5.5 for Front-loading, the Department of Energy just recently (December 2014) established new federal minimum standards for commercial clothes washers that will become effective in 2018.

**Proposed Amendment**

Strike – *[(2) Commercial clothes washers must have a minimum modified energy factor of 1.26 and a maximum water consumption factor of 9.5. For purposes of this subsection, capacity, modified energy factor and water consumption factor are defined and shall be measured in accordance with the federal test method for commercial clothes washers under 10 C.F.R. 430.23.]*

AHAM appreciates the opportunity to comment on SB 20. Please contact me or Kevin Messner ([kmessner@politicallogic.net](mailto:kmessner@politicallogic.net)) to discuss this matter further.

Sincerely,



Robert McArver  
Vice President, Policy & Government Relations