SB 418_PHTA_Letter of Support.pdf
Uploaded by: Davidson, Jason
Position: FAV

February 10, 2021

The Honorable Paul G. Pinsky
Senate Education, Health, and Environmental Affairs Committee
2 West Miller Senate Office Building
11 Bladen Street
Annapolis, Maryland 21401

Re: Support of amendments for Senate Bill 418 — Maryland Energy Administration — Energy and Water Efficiency Standards — Alterations

Dear Chairman Pinsky:

This bill, relating to the establishment of certain energy efficiency standards through the adoption of regulations, provides for energy efficiency requirements for a number of appliances used by the citizens of Maryland. By requiring minimum efficiencies, this bill will save consumers and businesses money on their utility bill at the same time decreasing energy consumption and reducing greenhouse gases.

With regard to the portable spa provisions in this bill, we support the proposed amendments, which are consistent with what is used within the industry and in other state and national standards. We fully support the requirement to have Maryland portable spas meet the latest edition of the ANSI/APSP/ICC-14 Standard for Portable Electric Spa Energy Efficiency. This standard has been adopted by over 21 states through either the adoption of the International Pool and Spa Code (ISPSC) or by appliance energy efficiency legislation similar to what Maryland is considering in SB 418.

Currently, the Maryland General Assembly is also considering HB 109 and SB 254 which would adopt the ISPSC, which references this same APSP-14 Standard and therefore align with the intent of this piece of legislation. Additionally, at least 10 additional state legislatures have either filed or will file legislation to adopt the Portable Electric Spa Energy Efficiency APSP-14 Standard in 2021. To ensure consistency with what is required within this standard and a higher compliance rate, we strongly support its inclusion into statute via this legislation.

POOL & HOT TUB ALLIANCE
2111 Eisenhower Ave., Ste 500
Alexandria, VA 22314

On behalf of the many Maryland pool and spa professionals represented by PHTA, as well as those in neighboring states that do business in Maryland, we respectfully request that you consider moving this important legislation out of your committee.

Sincerely,

Jason Davidson

PHTA, Director of Government Relations

jdavidson@phta.org

About Us

The Pool & Hot Tub Alliance was formed in 2019, combining the Association of Pool & Spa Professionals (APSP) and the National Swimming Pool Foundation (NSPF). With the mission to “Celebrate the Water,” PHTA facilitates the expansion of swimming, water safety and related research and outreach activities aimed at introducing more people to swimming, making swimming environments safer and keeping pools open to serve communities.

APSP, now the PHTA, is the world’s oldest and largest association representing swimming pool, hot tub, and spa manufacturers, distributors, manufacturers’ agents, designers, builders, installers, suppliers, retailers, and service professionals. Dedicated to the growth and development of its members’ businesses and to promoting the enjoyment and safety of pools and spas, PHTA offers a range of services, from professional development to advancing key legislation and regulation at the federal and local levels, to consumer outreach and public safety. PHTA is the only industry organization recognized by the American National Standards Institute to develop and promote national standards for pools, hot tubs, and spas. For more information, visit PHTA.org.

SB418_IndivisibleHoCoMD_FAV_Elizabeth Fixsen.pdf
Uploaded by: Deutschmann, Richard
Position: FAV

SB418– Maryland Energy Administration – Energy and Water Efficiency Standards – Alterations
Testimony before Senate Education, Health, and Environmental Affairs
Hearing Feb. 10, 2021
Position: Favorable

Mr. Chair, Madame Vice Chair and members of the committee, my name is Elizabeth Fixsen, and I represent the 700+ members of Indivisible Howard County. We are providing written testimony today in ***support of SB418***, to make alterations in energy and water efficiency standards for certain products sold in the state of Maryland. Indivisible Howard County is an active member of the Maryland Legislative Coalition (with 30,000+ members).

According to EmPower Maryland, energy efficiency is among the least expensive ways to meet the growing electricity demands of the state. This finding is repeatedly affirmed by national studies. The EmPOWER Maryland Energy Efficiency Act of 2008 established a goal to reduce per capita electricity usage and peak demand 15 percent by 2015. The 2015 goals were met statewide.

In 2017, the EmPOWER statute was updated to establish a new goal structure and cost-effectiveness requirements for the 2018-2020 and 2021-2023 program cycles. The new goal is an annual energy savings goal of 2% of gross energy sales. **SB418** will move our state towards greater energy efficiency, including application of Energy Star standards, for a range of products that use electricity.

Furthermore, the bill will promote water use efficiency. According to EnergyStar.gov, using water-saving techniques diverts less water from our rivers, bays, and estuaries, which helps keep the environment healthy. It can also reduce water and wastewater treatment costs and the amount of energy used to treat, pump, and heat water. This lowers energy demand, which helps prevent air pollution. As our population continues to grow, demands on precious water resources increase. There are many opportunities to use household water more efficiently, saving users money without reducing services.

Thank you for your consideration of this important legislation.
We respectfully urge a favorable report.

Elizabeth Fixsen
Savage, MD

Sources Cited:

EmPower Maryland. Maryland Public Service Commission.
https://www.psc.state.md.us/electricity/empower-maryland/

EmPower Maryland Fact Sheet. Maryland Public Service Commission
https://www.psc.state.md.us/electricity/wp-content/uploads/sites/2/EmPOWER_2019-Data.pdf

Saving Water Helps Protect Our Nation's Water Supplies. Energy Star.
https://www.energystar.gov/products/saving_water_helps_protect_our_nations_water_supplies

Maryland2page fact sheet.pdf
Uploaded by: DiMascio, Marianne
Position: FWA

Appliance Efficiency Standards

Maryland business and residents are spending more money than necessary running appliances and lighting in homes and businesses. Efficiency standards ensure that the products we purchase use less energy and water while preserving quality and affordability. Maryland residents can put money saved on utility bills towards other needs.

The basics of appliance efficiency standards

- Set a minimum level of energy and water efficiency for household and commercial appliances
- Provide savings for consumers and businesses
- Encourage innovative water- and energy-saving technologies

By 2025, new standards could save the electricity equivalent to powering **10,000** Maryland homes.

Standards benefit the environment

- Cut CO2 emissions and help Maryland meet Greenhouse Gas Emissions Reduction Act goals
- Cut other emissions harmful to public health
- Save precious water resources
- Reduce need to build more power plants

If new standards are **not** enacted in 2021, Maryland consumers and businesses would lose out on **$70** million in savings per year.

Standards bring huge benefits to Maryland

- **Affordability**: Consumers and businesses save money on utility bills, protecting customers from energy waste
- **Jobs**: Local economies get a boost when consumers have more spending money
- **Clean energy**: Public health and air quality improve when emissions and pollutants are cut

Neighboring states are acting on standards

- In the northeast, DC and Vermont adopted a similar package of standards. Connecticut, Maine, Massachusetts, New Jersey, New York, Pennsylvania, and Rhode Island plan to pursue standards in 2021.
- Outside the northeast, California, Colorado, Hawaii, and Washington have adopted many of the same standards.
- Maryland should not be left behind.

Support Appliance Standards in Maryland in 2021

The time to act is now!

Energy savings | **Water Savings** | **Utility Bill Savings** | **Emissions Reductions**

What's in it for Maryland consumers?

Annual savings in 2025	Equivalent to:
130 GWh of electricity	Electricity consumption of 10,000 MD households
283 billion Btus of natural gas	Natural gas consumption of 7,000 MD households
4.2 million gallons of water	Water consumption of 58,000 MD households
55,000 metric tons of CO2	Emissions from about 12,000 cars for a year

Residents, businesses, and government save money.

Efficiency standards ensure that the products we purchase use less energy and water while preserving quality and affordability.

Maryland residents, businesses, and local and state governments will save more than **$70 million annually by 2025**, which can be re-invested in the local Maryland economy, spurring job creation. These **savings grow to $330 million annually by 2035.**

Short payback periods and long-term benefits: Of the 11 standards included in the bill, 7 have **no incremental cost**, so consumers and businesses start saving right away. For the remaining 4 standards, the payback period is one year or less.

Additional Benefits

Maryland would be eligible to earn additional points on the ACEEE Energy Efficiency Scorecard (Maryland currently in #6 position.)

Water savings can reduce strain on water supply and delay the need for water and sewer infrastructure improvements.

These standards would be in addition to federal appliance standards that are **already saving Maryland households about $520 a year** on utility bills.

Do I have to replace my current products?

No. Efficiency standards merely raise the floor for products available for new purchases and do not require changing out products currently in use. The recommended standards are also set to ensure consumers and businesses will have numerous choices of qualifying products to purchase.

Residential	Commercial/Industrial	Water	Multi-Sector
Air purifiers	Commercial dishwashers	Faucets	Electric vehicle supply equipment*
Portable electric spas	Commercial steam cookers	Showerheads	High CRI lamps
Residential ventilating fans		Spray sprinkler bodies	Water coolers
		Toilets	
		Urinals	*May adopt standards for EVSE

SB0418 Testimony Appliance Standards Awareness Pro

Uploaded by: DiMascio, Marianne

Position: FWA

February 1, 2021

Members of the Senate Education, Health, and Environmental Affairs Committee
Maryland State House, Annapolis MD

RE: SB0418 Energy and Water Efficiency Standards

Dear Honorable Members of the Committee:

Please accept this testimony on behalf of the Appliance Standards Awareness Project (ASAP) regarding SB0418. **ASAP supports SB0418 as amended.**

ASAP is a coalition project that includes representatives from energy efficiency, consumer and environmental advocacy groups, state government, and utilities. ASAP works to advance cost-effective appliance standards at both the national and state level.

Our organization, along with the American Council for an Energy-Efficient Economy (ACEEE), published a report on state appliance standards entitled: *States Go First: How States Can Save Consumers Money, Reduce Energy and Water Waste, and Protect the Environment with New Appliance Standards*[1]. We also published state savings analyses which we update annually. We would be happy to provide additional information about the products, standards, and analysis as requested.

Appliance standards have been called the best climate and energy policy that you've never heard of because of their strong impact and low profile. Most people are unaware that federal efficiency standards are already savings Maryland consumers and businesses $522 a year in lower utility bills.[2] Adopting the state efficiency standards in SB0418 would add to the savings and further reduce energy and water waste and lower consumer utility bills.

FACTS ABOUT STANDARDS IN SB4180; The standards included in the bill are:

- **Very cost effective to buyers and users** – Most of the products in the bill have NO incremental cost so consumers start saving right away. For others, utility bill savings pay back the incremental cost of products meeting the standards within one year.
- **Readily available** – Products and technologies meeting the standards are readily available today from multiple manufacturers.
- **Provide significant energy savings statewide** – the standards make a meaningful contribution to meeting the state's energy, water, and climate needs.

MARYLAND HAS A HISTORY OF LEADERSHIP ON APPLIANCE STANDARDS
In 2004, and again in 2007 (with Senator Pinsky as sponsor), Maryland was one of the first states after California to adopt efficiency standards for about 15 products. Most of the products in those bills

[1] 2017 ASAP/ACEEE report: *States Go First: How States Can Save consumers Money, Reduce Energy and Water Waste, and Protect the Environment with New Appliance Standards.*
[2] From the 2017 ASAP/ACEEE White Paper, *Energy Saving States of America: How Every State Benefits from National Appliance Standards.*

became part of national standards legislation in 2007, leading to massive energy and dollar savings and CO_2 reductions nationwide. We are currently at a critical point where states can have a big impact, particularly with the U.S. Department of Energy playing catch-up on federal standards after years of delays and rollbacks. Maryland can take the lead in the mid-Atlantic region with this latest package of state standards.

OTHER STATES ARE ACTING; MARYLAND MAY BE LEFT BEHIND.
While Maryland has a strong history of acting on appliance standards, it could potentially be left behind as other states act. Colorado, Hawaii, Nevada, New York, Vermont, Washington, and Washington D.C. have adopted appliance standards. Regionally, Connecticut, Maine, Massachusetts, and Rhode Island have either filed or plan to file efficiency standards bills in 2021.

SB0418 WOULD SAVE MONEY, ENERGY, AND WATER AND REDUCE GREENHOUSE GASES
The bill would set minimum energy and water efficiency standards for 11 common household and commercial appliances. If adopted, the standards could save Maryland residents and businesses more than $70 million on utility bills in 2025. As more and more consumers purchase products compliant with state efficiency standards, annual savings would grow, reaching nearly $330 million in 2035.[3] In 2025, standards would save enough electricity in that one year to power 10,000 households and reduce CO_2 emissions by 55,000 metric tons or the equivalent of taking 12,000 cars off the road for a year.

STANDARDS ARE A COST-EFFECTIVE WAY TO ACHIEVE STATE GOALS
Adopting efficiency standards is a low-cost way for Maryland to cut energy and water waste, reduce utility bills and reduce greenhouse gases – the latter helping Maryland meet their Greenhouse Gas Emissions Reductions Act goals.

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

Sincerely,

Marianne DiMascio, State Policy Manager
Appliance Standards Awareness Project

[3] Ibid.

SB0418 - FWA.pdf
Uploaded by: Fahrig, Landon
Position: FWA

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor
Mary Beth Tung, Director

TO: Members, Education, Health, & Environmental Affairs Committee
FROM: Mary Beth Tung – Director, MEA
SUBJECT: SB0418 – Maryland Energy Administration – Energy and Water Efficiency Standards – Alterations
DATE: February 10, 2021

MEA POSITION: FWA

Senate Bill 418 continues Maryland's efforts to implement appliance efficiency requirements that reduce energy use, minimize adverse environmental impacts, and ultimately save consumers money.

States are generally preempted from establishing state energy-efficiency standards for products that are covered by federal standards.[1] However, states are permitted to establish energy efficiency for products that are *not* covered by the Federal appliance standards program. At least 18 states have enacted appliance standards at various times.[2] These state standards have benefited the residents of those states while encouraging an increase in national standards. Most of today's national standards, which cover products ranging from refrigerators to commercial air conditioners to electric motors, started out at the state level.[3]

The proposed legislation as amended requires MEA to adopt specific energy efficiency standards for 11 appliances, and permit MEA to adopt regulations for 2 additional technologies. The bill also requires MEA to review standards and permits MEA to update those standards through regulation.

The bill as amended requires the adoption of minimum efficiency standards for: air purifiers, commercial dishwashers, commercial steam cookers, faucets, portable electric spas, residential ventilating fans, showerheads, spray sprinkler bodies, toilets, urinals, and water coolers. These energy- and water-efficiency standards are established based on various sources, including ENERGY STAR®[4] and WaterSense[5] specifications, and standards issued by the U.S. Department of Energy.

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[1] https://www.nrdc.org/experts/lauren-urbanek/states-step-progress-efficiency-standards
[2] https://database.aceee.org/state/appliance-standards-summary
[3] https://appliance-standards.org/sites/default/files/States%20Go%20First.pdf
[4] Started in 1992 as part of the federal Clean Air Act, ENERGY STAR is a federal voluntary program run by the U.S. Environmental Protection Agency (EPA) to help people learn more about the many ways they can save money and help reduce environmental degradation through improved energy efficiency. Under the program the EPA identifies and promotes energy-efficient products and buildings, all with the overall goal of reducing energy consumption, improving energy security and reducing pollution. https://blog.constellation.com/2016/01/15/what-is-energy-star/
[5] WaterSense, a voluntary partnership program sponsored by the U.S. Environmental Protection Agency (EPA), is both a label for water-efficient products and a resource for helping to save water. The WaterSense label makes it simple to find water-efficient products, new homes, and programs that meet EPA's criteria for efficiency and performance. WaterSense-labeled products and services are certified to use at least 20 percent less water, save energy, and perform as well as or better than regular models. https://www.epa.gov/watersense/about-watersense

If enacted, this bill will result in over 4,000 gigawatt hours (GWh) of electricity savings (1 GWh = 1,000.00 megawatt hours), 158 million gallons of water savings, and over 2,235 thousand metric tons of carbon dioxide savings.

Admittedly, efficiency standards have the potential to increase incremental costs. This is less than desirable in the midst of economic recovery. Therefore, MEA has gone to some lengths to limit the scope of this bill so that it minimizes any potential negative effects on business growth and investment. MEA is offering the attached amendments (*see page 3*) to further incorporate the input it has received from industry partners, while maintaining significant savings requirements.

Specifically the amendments require make a technical correction to a definition; close a loophole for "dual-flush" toilets; protect homeowners from unintentional violations of the law; correct efficiency requirements to include specific standards portable electric spas and remove noise-level requirements for ventilating fans; and remove a subsection aimed at mitigating federal rollbacks on efficiency standards that advocates no longer feel is necessary; respectively.

For these reasons, MEA urges the Committee for a **favorable report as amended**.

MEA Recommended Amendments

AMENDMENT NO. 1

On page 4 in line 28 strike "**or**".

AMENDMENT NO. 2

On page 5, strike beginning with "**does**" in line 19 down through "**water**" in line 20 and substitute "**includes a water closet incorporating a feature that allows the user to flush the water closet with either a reduced or a full volume of water, also known as a dual-flush water closet**".

On page 10 after line 36 insert

"**A. Dual-flush tank-type water closets shall have a maximum dual flush effective flush volume of 1.28 gallons per flush;**".

AMENDMENT NO. 3

On page 6 in line 13, after "installed" insert "**for profit**".

On page 8 in line 19, and on page 11 in line 22, in each instance, after "**installed**" insert "**for profit**".

AMENDMENT NO. 4

On page 8 in lines 5, 9, 11, and 19, in each instance, strike "**(b)(1)(i) through (iii)**" and substitute "**(b)(1)(i) through (ii)**".

On page 8 in line 25, and on page 11 on lines 14 and 22, in each instance, strike "**(b)(1)(iv) through (xiii)**" and substitute "**(b)(1)(iii) through (xiii)**".

On page 10 in line 10, after "the" insert "**cubic feet per minute per watt (cfm/W) energy efficiency**"; in line 13 strike "**4.1**" and substitute "**3.2**"; and in line 36 strike "**; and**" and substitute a colon.

On page 11 in line 12 strike the period and substitute "**; and**"; and after line 12 insert

"**11. Portable electric spas shall meet the requirements of the American National Standard for Portable Electric Spa Energy Efficiency specifically known as ANSI/APSP/ICC 14-2019.**"

AMENDMENT NO. 5

On page 15, strike in their entirety the lines beginning with 11 through line 20, inclusive.

Maryland Appliance Efficiency Standards AHAM Testi

Uploaded by: Cassady, Jacob

Position: UNF

ASSOCIATION OF HOME APPLIANCE MANUFACTURERS

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TESTIMONY

Jacob Cassady
Director, Government Relations

On Behalf of
The Association of Home Appliance Manufacturers

Before the Maryland Senate Committee on
Education, Health, and Environmental Affairs

HEARING

SB 418
Relating to Energy and Water Efficiency Standards

February 10, 2021

Chair Pinsky, Vice Chair Kagan, and members of the Committee, the **Association of Home Appliance Manufacturers (AHAM) strongly urges the committee to <u>oppose SB 418</u>**, an act concerning appliance efficiency standards. Although AHAM understands the bill's intent to save energy, the legislation has a number of problems relating to home appliances that need to be addressed.

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 support more than one million jobs, have a $198 billion economic impact, and produce more than 95% of the household appliances shipped for sale. In Maryland, the home appliance industry is a significant and critical segment of the economy. The total economic impact of the home appliance industry to Maryland is $1.2 billion, nearly 8,000 direct and indirect jobs, $194.1 million in state tax revenue and more than $426.6 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.

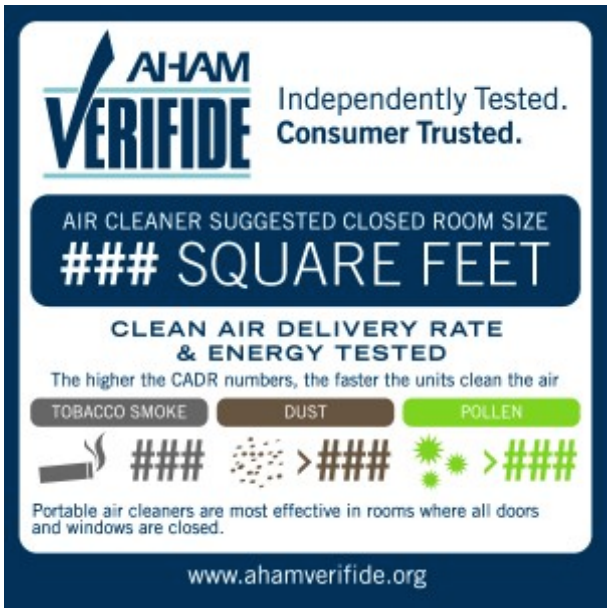
SB 418 will restrict the availability of air cleaners/purifiers in Maryland and effectively remove approximately 60% of air cleaners from the shelves. No other state has created this type of standard for air cleaners, and for very good reason. In 2004, California was considering energy standards for air cleaners and reversed course after careful consideration and input from industry. Please find the attached report by AHAM on this issue, which outlines the reasons why energy standards for air cleaners are not appropriate.

Maryland consumers will be faced with fewer options at higher cost, potentially putting them out of reach for lower-income residents. Air cleaners/purifiers 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 exact 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.

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. For air cleaners/purifiers, SB 418 points to an old Energy Star version, making it difficult to identify which products meet the levels. ENERGY STAR had an October 2020 effectivity date for revision 2.0 on air cleaners. Even with this new version, 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. ENERGY STAR never was and never should be used as a mandatory minimum. Furthermore, the bill sets levels that are based on smoke CADR (Clean Air Delivery Rate). The current version sets a CADR/Watt based on dust, not smoke. The implications of this bill's standard level is based on no justification or understanding of the marketplace.

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 dust CADR. If the dust 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 for 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.

As leaders in energy efficiency and active participants in efficiency matters before the U.S. Department of Energy, AHAM is opposed the bill's language authorizing the Maryland Energy Administration to adopt rules to enforce minimum efficiency standards for certain products and establish or amend appliance efficiency standards. Under federal law, manufacturers have three years to comply with regulations, which allows for redesign, retooling of factories, pilot product testing, safety testing, and many other requirements to ensure the product is ready for the market. Technical standards such as these are very costly to develop and the Maryland legislature should consider whether it is economically feasible for the Energy Administration to absorb these costs.

Conclusion

AHAM appreciates the opportunity to provide comments on SB 418 and strongly urges the Education, Health, and Environmental Affairs 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) 202.872.5955 x327 or via electronic mail at jcassady@aham.org.

MBIA Testimony SB 418.pdf
Uploaded by: Graf, Lori
Position: UNF

MARYLAND BUILDING INDUSTRY ASSOCIATION
11825 West Market Place | Fulton, MD 20759 | 301-776-6242

February 10, 2021

The Honorable Paul G. Pinsky
Senate Education, Health & Environmental Affairs Committee
Miller Senate Office Building,
2 West Wing 11 Bladen St.,
Annapolis, MD, 21401

RE: Opposition to SB 418 (Maryland Energy Administration – Energy and Water Efficiency Standards – Alterations)

Dear Chairman Pinsky:

The Maryland Building Industry Association, representing 1,100 member firms statewide, appreciates the opportunity to participate in the discussion surrounding SB 418 Maryland Energy Administration – Energy and Water Efficiency Standards – Alterations. MBIA **Opposes** the Act in its current version.

This measure would change the definitions of various types on industrial apparatus and requires the administration to draft new efficiency standards for those new products. MBIA opposes this measure on grounds that the changes in efficiency standards and definitions would disrupt existing projects if they are adopted by January 2022, additionally the new requirements to meet efficiency standards will increase the expense to builders and by extension will increase the cost to consumers. Many of these renovations directly effect business improvements, especially commercial eateries and would represent a significant expenditure during a period where many small businesses are struggling due to the COVID-19 pandemic.

We also have concern about availability of certain products. If these standards exceed Industry standards the availability of product could be problematic. This issue has been exacerbated by COVID-19. We have seen many supply chain issues that make product availability an issue.

For these reasons, MBIA respectfully requests the Committee give this measure an unfavorable report. Thank you for your consideration.

For more information about this position, please contact Lori Graf at 410-800-7327 or lgraf@marylandbuilders.org.

cc: Members of the Senate Education, Health & Environmental Affairs Committee