

Key Talking Points on DOE's Proposed Appliance Standards Rollbacks

*Proposals by the U.S. Department of Energy (DOE) to revoke existing energy and water efficiency standards for more than a dozen types of appliances and equipment would sanction products that use multiple times more energy than these products use today. This would result in significantly increased costs for households and businesses. For a number of product categories, DOE's proposals would completely eliminate the standards, and for some others it would revert the standards to water or energy efficiency levels originally set by Congress many years ago. **We encourage you to submit comments urging the department to withdraw these proposals; below are talking points you can use to shape one general comment to submit to all 17 dockets. DOE is accepting comments on these proposals through July 15.***

- The Department of Energy has claimed that these proposed rollbacks would save Americans \$11 billion, but the cost of rolling back these standards dwarfs the benefits. In fact, the department's own previous analyses conducted when updating these standards demonstrated that:
 1. DOE found each of these standards to be economically justified and technologically feasible, as required by law; and
 2. Eliminating these standards would cost households and businesses more than \$54 billion in increased utility bills—nearly **five times** the amount that would be “saved” from eliminating them. In other words, [the repeals would have a net cost of \\$43 billion for households and businesses](#).
- In addition to raising costs, these proposals would harm everyday Americans by:
 - Increasing emissions that endanger public health and the climate
 - Straining water resources
 - Straining the electric grid at a time when we are seeing significant load growth
 - Undermining manufacturers' investments in meeting the current standards
- The anti-backsliding provision in the Energy Policy and Conservation Act explicitly prohibits DOE from weakening an efficiency standard once it has been finalized ([42 US Code 6295\(o\)](#)).
- These proposals could significantly increase the operating costs of products ranging from dehumidifiers and portable air conditioners to air compressors used in industry. But they clearly violate the law and court precedent from [2004 NRDC v. Abraham](#), which ruled to “restrict DOE's subsequent discretionary ability to weaken [a finalized] standard at any point thereafter.”
- If this attack on consumers succeeds, President Trump would be raising costs for families and businesses by allowing manufacturers to sell energy- and water-wasting products into the market.
- Every standard that DOE wants to revoke has been saving consumers and/or businesses far more than it costs, according to DOE's own data.
 - For example, rolling back the standards for air cleaners (also known as air purifiers) would save purchasers \$500 million—but cost them \$14.1 billion in extra energy bills.



- Example of a closing for letters/comments: “DOE’s proposals are unlawful. Furthermore, the proposals would increase costs for consumers and businesses, strain the electric grid and water resources, and undermine manufacturers’ investments in meeting the current standards. We therefore urge you to withdraw these proposals.”

Links to Active Dockets and Submission Instructions

Near the top of every docket page (see links below), there are instructions on submitting comments. Our preferred method is to submit directly through the portal or to send the comment to the email provided. If you submit through the portal, you can opt in to receive a tracking number; whereas if you submit via email, it’s a good idea to check the docket a few days after submitting to ensure it has shown up. If you have any questions, please reach out to mparker@standardsasap.org.

Products	DOE’s Proposed Action
Air cleaners	Eliminate standards
Dehumidifiers	Repeal of current standards, reverting to standards set by Congress in 2007
Commercial clothes washers	Repeal of current water efficiency standards, reverting to standards set by Congress in 2005
Battery chargers	Eliminate standards
Automatic commercial ice makers	Repeal of current condenser water use standards, reverting to standards set by Congress in 2005
Commercial prerinse spray valves	Repeal of current standards, reverting to standards set by Congress in 2005
Compact residential clothes washers	Eliminate standards
Conventional cooking tops	Repeal of amended design requirements, reverting to standard set by Congress in 1987
Conventional ovens	Repeal of amended design requirements, reverting to standard set by Congress in 1987
External power supplies	Eliminate standards for some power supplies and revert to current standards set by Congress for others
Faucets	Repeal of current standards, reverting to standards set by Congress in 1992
Microwave ovens	Eliminate standards
Residential clothes washers	Repeal of current water efficiency standards, reverting to standards set by Congress in 2007
Compressors	Eliminate standards
Miscellaneous refrigeration products	Eliminate standards
Portable air conditioners	Eliminate standards
Dishwashers	Repeal of current water efficiency standards, reverting to standards set by Congress in 2007

