AHRI Policy Position
Energy Efficiency, Standards, and Programs

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) is the trade association representing manufacturers of heating, ventilation, air-conditioning, refrigeration (HVACR) and water heating equipment within the global industry. AHRI’s more than 320 member companies account for over 90 percent of HVACR and water heating residential and commercial equipment manufactured and sold in North America.

Background
AHRI believes in the importance of the development and use of products that achieve increased energy efficiency. AHRI members are committed to producing more energy efficient products to help reduce the demand for energy, lower costs for the consumer, and decrease greenhouse gas emissions.

The Energy Policy and Conservation Act (EPCA), passed in 1975, established a nation-wide framework for energy conservation standards, and granted authority to the Department of Energy (DOE) to regulate energy efficiency for specific consumer products and commercial equipment (described as “covered”). EPCA was enacted as a grand compromise—mandating energy efficiency regulation on a consistent, national framework. The federal government is required to assess energy conservation standards continually on six-year intervals, while states and localities are preempted from setting efficiency standards for covered products and equipment that are not identical to DOE’s.

Congress enacted the preemption provision of EPCA to eliminate separate state appliance standards that threaten to create an ever-increasing patchwork of state regulations. States and localities interested in enacting energy or climate legislation often overlook EPCA’s important preemption provisions. AHRI supports a consistent national framework of appliance efficiency regulations by educating state and local legislators about the strictures of federal efficiency law. AHRI can provide detailed analysis on which products are covered, what kinds of regulations are preempted, and how a state or locality can incentivize energy efficiency while complying with federal law. AHRI will continue to collaborate with lawmakers and regulators at every level of government to support innovative free market energy efficiency standards and programs, ensuring they are economically and technically feasible, technologically neutral, and environmentally friendly.

Industry Position and Considerations
AHRI supports efforts to increase the adoption of higher efficiency HVACR equipment, including through funding for utility-run energy efficiency programs and other programs that incentivize consumers to replace older, less efficient water heating and HVACR equipment with newer more efficient models.

AHRI strives to ensure that efficiency standards for HVACR and water heating equipment are uniform throughout the United States and do not conflict with federal requirements and do not violate EPCA’s preemption provision. Finally, AHRI also encourages state and local jurisdictions to update legislative and regulatory language that accurately reflects current energy efficiency standards and performance metrics being used to measure product efficiency.