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March 25, 2019

Chair Dominique Jackson
House Energy and Environment Committee
200 East Colfax
HCR 0112
Denver, CO 80203

Re: CTA Comments on HB19-1231 – New Appliance Energy and Water Efficiency Standards

Dear Chair Jackson:

The Consumer Technology Association™ (CTA) appreciates the opportunity to comment on [HB19-1231](#) and respectfully submits a request to the House Energy and Environment Committee to remove unnecessary requirements on computers or computer monitors sold in Colorado [Sections 6-7.5-102(13), 6-7.5-104(1)(f), and 6-7.5-105(3)(e)]. HB19-1231 requires that all computers and computer monitors sold in Colorado meet a set of California Energy Commission (CEC) standards. Computers and computer monitors sold in Colorado will automatically meet the CEC standards referenced without this legislation and, as such, the additional regulatory burden on industry and agency resources to administer will result in no actual increase in energy efficiency savings for Colorado consumers.

CTA is the trade association representing the U.S. consumer technology industry, which supports more than 15 million U.S. jobs. Our membership includes more than 2,200 companies – 80 percent are small businesses and startups; others are among the world’s best known manufacturer and retail brands. For many years, CTA has advanced energy efficiency with a variety of initiatives related to public policy, consumer education, research and analysis, and industry standards. Our industry has achieved real results – more consumer products than ever are using *less energy*.¹ We share the legislature’s goal of increasing energy efficiency but we do not believe the approach outlined in [HB19-1231](#) is the path to get there.

Computers and computer monitors sold in California are the same computers and computer monitors sold in Colorado. Manufacturers do not distribute computers and computer monitors state-by-state. Rather, manufacturers design and make these products to meet the most stringent standard found in

¹ A recent peer-reviewed study commissioned by CTA and produced by Fraunhofer USA finds the number of tech devices in U.S. homes has increased 21 percent since 2010, but those devices now account for 25 percent less residential energy consumption over that same time.¹ This landmark energy efficiency achievement is due to the consumer tech industry’s investments and innovation. These achievements weren’t accomplished through mandated state or federal requirements. (Urban, Roth, Singh, & Howes. “Energy Consumption of Consumer Electronics in U.S. Homes in 2017”. December 2017. Available at: <http://www.cta.tech/cta/media/policyImages/policyPDFs/Energy-Consumption-of-Consumer-Electronics-in-U-S-Homes-in-2017.pdf>)

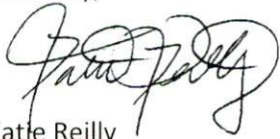
CTA Comments on HB19-1231 – Amendment Request
March 25, 2019

their distribution market which, for computer and computer monitor manufacturers is the U.S. or North American market. The adoption of the CEC energy efficiency standards results in no increase in energy efficiency savings for Colorado consumers over what naturally occurs in the market.

If Colorado were to adopt California standards for computers and computer monitors in order to achieve energy efficiency savings, that is the equivalent of a solution looking for a problem. Those achievements will occur regardless of requiring industry to operate under a regulatory scheme in Colorado for a California standard they are already complying with. As an industry, CTA's members would prefer to focus resources where we can make meaningful progress on energy efficiency and continue to look forward, not spend resources demonstrating compliance for products already available to Colorado consumers. The inefficiency and compliance burden for industry and the state government to ultimately achieve the same end goal of energy efficiency savings for Colorado consumers doesn't make sense.

CTA appreciates the opportunity to request the House Energy and Environment Committee remove the requirements for computers and computer monitors found in Sections 6-7.5-102(13), 6-7.5-104(1)(f), and 6-7.5-105(3)(e) of HB19-1231. Please do not hesitate to contact me with any questions or requests for additional information.

Sincerely,



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cc: Representative Edie Hooton, Vice Chair
Representative Meg Froelich
Representative Tim Geitner
Representative Cathy Kipp
Representative Lois Landgraf
Representative Larry Liston
Representative Lori Saine
Representative Emily Sirota
Representative Alex Valdez
Representative Mike Weissman