

To: Maisano, Frank[frank.maisano@bracewell.com]
From: Maisano, Frank
Sent: Tue 9/12/2017 4:15:32 PM
Subject: SPECIAL UPDATE: Conservatives on Solar Tariff, Fed AV Policy Released, Hurricane Flooding Risks for HVAC Systems

Friends,

Some really important issues moving today, as well as an update for flooded HVAC Systems in light of the recent hurricanes. Finally, **REMEMBER today's 2 p.m. press briefing** at the National Press Club on steel tariff issues.

1) Conservative Groups Weigh In on Solar Tariff – Today, six conservative groups urged members of the US International Trade Commission to reject the relief requested by Suniva under rarely used but powerful statute, Section 201 petition in [a letter today](#). I can send you pdf if you can't get the link or contact Clark Packard at R Street (cpackard@rstreet.org)

The groups said the tariffs and minimum price floors requested by Suniva and SolarWorld would double the cost of solar products in the United States, lead to retaliation by our trading partners and face a challenge at the World Trade Organization (WTO).

They also said while they oppose government policies that pick winners and losers in the energy marketplace, we are equally hostile to protectionist trade measures that distort markets and invite retaliation by our trading partners.

“We urge the ITC to reject an injury finding in this case. If the commission does find injury, we urge you to tailor your recommended relief narrowly by exempting imports from countries with which the United States has free-trade agreements.”

Signers of the letter include R Street, the American Legislative Exchange Council, ALEC Action, Citizens for Responsible Energy Solutions Forum, the National Taxpayers Union and the Taxpayers Protection Alliance.

Finally, the Heritage Foundation also released a white paper that urges US ITC to Oppose the position: <http://www.heritage.org/node/553152/print-display>

2) DOT to Release Federal AV Policy – The Department of Transportation’s National Highway Traffic Safety Administration (NHTSA) today releases the Federal Autonomous Vehicle Policy (FAVP) “2.0,” streamlining and refining its inaugural autonomous vehicles (AV) policy. The new policy reflects the response to public comments, including those by SAFE.

Securing America’s Future Energy (SAFE) applauded Secretary Elaine Chao and the impressive work by NHTSA staff for prioritizing AVs within DOT and responding to stakeholder calls by continually improving the foundation of these vital policies that will encourage innovation and maintain America’s leadership.

Autonomous vehicles are a critical technology with the potential to spur some of the greatest improvements to society since the industrial revolution. SAFE will continue to work with policymakers and regulators to ensure a strong national framework is in place to allow the deployment of these vehicles of the road keeping America in the lead of this innovation.

“The on-time release of the FAVP 2.0 reemphasizes the commitment by DOT and NHTSA to quickly address and overcome the chances of a messy patchwork of state regulations,” said Robbie Diamond, SAFE President and CEO. “SAFE looks forward to continuing to work with the agency on version 3.0 to keep ahead of this technology revolution and ensure driverless cars have the necessary flexibility to significantly enhance our nation’s transportation, save tens of thousands of lives on our roads, expand mobility for millions of Americans and strengthen our national security through increased efficiency and fuel diversity.”

SAFE continues to advocate for a unified, clear, modernized framework from Congress to allow for a safe and speedy deployment of AVs on public roadways for both cars and commercial vehicles. Please call Bridget Bartol (202-461-2361) or me if you have questions.

3) Flood Impact on HVAC Systems – Even though power in many cases still hasn't been restored to the hurricane zones, when it is, there are significant concerns that homeowners and businesses must consider as they return.

The Air-Conditioning, Heating and Refrigeration Institute (AHRI), the trade association representing HVAC and water heating equipment, offered a few important safety precautions after a flood or hurricane with regard to their heating and cooling equipment. AHRI says standing water can severely damage a home's heating and cooling equipment and recommends that flood-damaged HVAC equipment be replaced, rather than repaired.

If HVAC equipment has been submerged or damaged by flood water, it is recommended that all inspection and replacement work be done by a qualified contractor and not the homeowner. Furthermore, not only is gas equipment at risk, but that risk includes units using oil and electricity as the power source should be left to professionals to inspect.

Please review the following information about home HVAC equipment and take necessary precautions to have that equipment inspected, as well as repaired or replaced by qualified professional contractors.

Heat Pumps and Air Conditioners:

Split air conditioning and heat pump systems have power and control wiring between the indoor and outdoor parts of the system, and piping through which refrigerant flows through the system. If flood water has caused either the outdoor or indoor units of a split system to become repositioned, even by a small amount, there is a potential for refrigerant leaks. The system will then require major repair or full replacement.

If the refrigerant system remains intact after the flood, the entire system should be cleaned, dried, and disinfected. Homeowners should have a contractor check the indoor and outdoor units' electrical and refrigeration connections, including all control circuits. The decision to repair or replace should be made after consultation with a qualified professional on a case-by-case basis.

Gas Furnaces and Boilers:

If there is any concern that flood water has reached a gas furnace or boiler, it should be inspected by a qualified HVAC contractor. Furnaces and boilers feature gas valves and controls that are particularly susceptible to water damage. While the damage might not be visible, corrosion begins inside the valves and controls, even if the outside appears to be clean and dry. At the very least, this damage can result in reliability issues.

Ductwork:

If a house that has incurred flood damage contains a central forced-air system, it is important to also closely inspect the ductwork. Duct insulation that has been in contact with flood water should not be salvaged as it is impossible to decontaminate. A qualified contractor can clean, dry and disinfect the ductwork; and a thorough job requires disassembling the ductwork all together.

Please make sure to have a qualified contractor inspect any HVAC equipment that has been submerged or damaged by flood. We also recommend that you contact any of the offices set up by the Federal Emergency Management Agency (FEMA) as government aid may be available to help flood victims finance the replacement of flood-damaged HVAC equipment.

Please visit www.fema.gov for information. You can also contact Francis Dietz (703-969-6444) or me if you have questions...

Frank Maisano

(202) 828-5864

c. (202) 997-5932