

From: Ben Lieberman
Sent: Thu, 17 Apr 2025 15:22:59 +0000
To: Hrkman, Lou (Louis)
Subject: [EXTERNAL] RE: A few thoughts on appliance regulations

Here is our complaint making the case that the Biden dishwasher and clothes washer regulations impermissibly tightened the water levels for these appliances. Paragraphs 10 – 20 get to the point. Our case is still pending. Note also that a 2024 federal decision, *Louisiana v. DOE*, is helpful here although it dealt mostly with the issue of longer cycle times.

https://cei.org/wp-content/uploads/2024/07/Clothes-Washer-Complaint_Filed.pdf

From: Hrkman, Lou (Louis) <lou.hrkman@hq.doe.gov>
Sent: Thursday, January 30, 2025 8:58 PM
To: Ben Lieberman <Ben.Lieberman@cei.org>
Subject: Re: A few thoughts on appliance regulations

This is great!!!!
 Thanks
 Lou

From: Ben Lieberman <Ben.Lieberman@cei.org>
Sent: Thursday, January 30, 2025 8:31:35 PM
To: Hrkman, Lou (Louis) <lou.hrkman@hq.doe.gov>
Subject: [EXTERNAL] A few thoughts on appliance regulations

1. The latest standard for conventional tank storage water heaters (a separate standard from the more recent one targeting tankless water heaters) will raise the cost of an electric model by a DOE-estimated \$953 when it takes effect in 2029.

2. The latest furnace standard will effectively outlaw gas fired non-condensing furnaces that are the best choice for millions of older homes not easily compatible with the condensing versions favored in the rule. DOE estimates an increase installed cost of \$867 for such difficult installations. Keep in mind these older homes are disproportionately owned by lower income homeowners. Note that DOE cost estimates often prove to be low.

3. The latest standard for light bulbs will raise the cost of a standard pear shaped bulb from \$2.98 to \$5.58, an increase of \$2.70 or nearly 91 percent. Note that earlier rules killed off incandescent bulbs in favor of LED bulbs, but the latest rule tightens the screws on LEDs so much that few current versions can meet them and only at an inflated price.

4. For dishwashers and washing machines, the problem is performance. DOE admitted that its rules are the reason a normal load of dishes now takes 2 or more hours as compared to an hour in many pre-standards models. Washing machine regulations have compromised cleaning performance and reliability. But instead of continuing with the Trump 1 efforts to revisit these

standards to fix the problems with them, the Biden DOE team has shut down these reforms AND went ahead with another round of new standards likely to make things worse.

5. A new central air conditioner regulation finalized at the end of Obama went into effect in 2023 and boosted equipment costs by \$1,000 or more, according to installers I have spoken with. While this rule can't be blamed on the Biden DOE, they learned nothing and are in the early stages of the next round of even tougher measures. Air conditioners are also being hit with Biden EPA standards that are also causing cost increases, so it is the one-two punch of the two agencies that has added thousands in costs.

6. DOE backed off quite a bit from its proposed stove rule in light of the public backlash, but the final version will save a DOE estimated 21 cent per year for a gas stove – clearly not worth it.

I hope this helps, and stand at the ready to provide more background. Ben

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