

**Richard Devlin**  
Chair  
Oregon

**Chuck Sams**  
Oregon

**Mike Milburn**  
Montana

**Doug Grob**  
Montana



## Northwest Power and Conservation Council

**Guy Norman**  
Vice Chair  
Washington

**Patrick Oshie**  
Washington

**Jim Yost**  
Idaho

**Jeffery C. Allen**  
Idaho

September 8, 2021

### DECISION MEMORANDUM

**TO:** Council members

**FROM:** Kevin Smit, Senior Analyst  
Andrea Goodwin, Senior Counsel

**SUBJECT:** Council Comments to the U.S. Department of Energy's Notices of Proposed Rulemaking (General Service Lamps and Short-Cycle Dishwashers, Clothes Washers, and Dryers)

**PROPOSED ACTION:** Approve Council comments to the U.S. Department of Energy's Notices of Proposed Rulemaking regarding 1) proposed revisions to the definition of General Service Lamps and General Service Incandescent lamps, and 2) proposed elimination of short cycle categories for dishwashers, clothes washers, and dryers.

**SIGNIFICANCE:** Federal standards has been a key delivery mechanism for cost-effective energy savings in the Northwest, which have been an important (and low cost) component in meeting efficiency goals.

### BUDGETARY/ECONOMIC IMPACTS

None.

### BACKGROUND

The U.S. Department of Energy recently issued two notices of proposed rulemaking (NOPR). The first is related to the definition of light bulbs and in this NOPR, DOE proposes to adopt the definitions of General Service Lamp (GSL) and General Service Incandescent Lamps (GSILs) and associated definitions as previously set forth in the January 2017 Final Rules, discontinuing exemptions for several lamps and expanding the definition of GSLs and GSILs. Effectively, this brings most of our common household lamps under the definition of GSL. It does not establish a standard for these bulbs at this point, but it is expected that DOE will soon, in a separate rulemaking,

address the applicable standards for these lightbulbs, including application and implementation of the 45 lumens per watt backstop. Staff circulated a draft comment letter to the Council under separate cover, which indicated support for this definition change.

The second notice of proposed rulemaking, DOE is proposing to eliminate the “short-cycle” categories for dishwashers, clothes washers, and dryers. These categories were introduced recently and this NOPR is proposing to revoke the rules that created these categories and to reinstate the prior product classes and applicable standards for these products. There are currently no standards for these short-cycle categories and therefore they could potentially use unlimited amounts of water and energy. The prior classification and standards still allow for short-cycle options, and most dishwashers, clothes washers, and dryers already provide short cycle options that still meet that standard. Staff circulated a draft comment letter to the Council under separate cover, which indicated support for the changes proposed in the NOPR.

### **ALTERNATIVES**

In the alternative to approving the draft comments as provided, members could revise the comments or decide to not submit comments at this time.