



National Electrical Manufacturers Association

KEVIN J. COSGRIFF

President and Chief Executive Officer

BY Email: qfr@epw.senate.gov

April 8, 2020

The Honorable John Barrasso
Chairman
Committee on Environment & Public Works
United States Senate
Washington, DC 20510

The Honorable Thomas Carper
Ranking Member
Committee on Environment & Public Works
United States Senate
Washington, DC 20510

Dear Chairman Barrasso and Ranking Member Carper:

I am writing to provide input to the Committee as it considers S.2754, the American Innovation and Manufacturing Act of 2019.

The National Electrical Manufacturers Association (NEMA) represents nearly 325 electrical equipment and medical imaging manufacturers that make safe, reliable, and efficient products and systems. Our industry produces \$124 billion in shipments and \$42 billion in exports of electrical equipment and medical imaging technologies per year. The electroindustry accounts for 370,000 American jobs in more than 6,100 facilities covering every state.

NEMA Members are interested in the AIM Act because they supply essential equipment to the heating, ventilating, air-conditioning, and refrigeration (HVACR) industry. Such finished products include motors and adjustable speed drives, as well as products used in rooftop air-conditioning, cooling tower, industrial blower and fan applications, and others. HVACR manufacturers are developing equipment utilizing new refrigerants with lower environmental impacts. This requires NEMA Members to work closely with them to ensure system compatibility, best achievable efficiency, and full regulatory compliance.

As an example of the importance of this coordination, motors used in HVACR systems need to undergo extensive compatibility testing. This ensures that motor insulating materials do not deteriorate prematurely from contact with refrigerant chemicals which could cause potential electric shock, fire, or other hazards. Tests take months to complete and must be validated through third party testing organizations. Such testing of motor compatibility can also require additional certification testing to address refrigerant flammability concerns. The AIM Act, if it properly implemented through a preemptive, uniform, and nationally mandated HFC refrigerant phasedown, will reduce costs associated with designing, testing, and certifying motors and motor-drive systems used in these applications. This in turn will make equipment more affordable to consumers and other end-users.

Without federal preemption, each state could – and many will – develop its own phasedown schedule and implementation dates. This would segment the market with different dates and refrigerant requirements for which manufacturers would be required to build multiple compliant

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systems. This would increase costs significantly and unnecessarily. Further, the lack of a standardized regulatory regime for refrigerants would cause enormous confusion in the marketplace thereby undermining the goals of American environmental policy related to refrigerants.

We trust this information is useful to the committee. Should you have questions or need more information, please have your staff contact Philip Squair, VP Government Relations, at philip.squair@nema.org.

Lastly, we hope you and your families and staff and their families are all safe and well.

Sincerely,

A handwritten signature in black ink that reads "Kevin J. Cosgriff". The signature is written in a cursive style with a large, stylized initial "K".

Kevin J. Cosgriff
President & CEO