



February 2, 2021

Oregon Legislative Assembly
House Committee on Energy and Environment
House Bill 2062

Re: Comments on House Bill 2062 – Energy Efficiency Standards for Certain Appliances

Dear Legislators,

These comments are submitted by the A. O. Smith Corporation (“A. O. Smith”) in response to House Bill 2062 (HB 2062) as introduced pertaining to requiring CTA-2045 ports and the associated supporting infrastructure for electric storage and heat pump water heaters.

A. O. Smith Corporation, with global headquarters in Milwaukee, Wisconsin, applies technology and energy-efficient solutions to products manufactured and marketed worldwide. Listed on the New York Stock Exchange (NYSE), the company is one of the world’s leading manufacturers of residential and commercial water heating equipment and boilers, as well as a manufacturer of water treatment and air purification products.

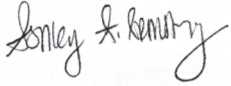
A. O. Smith has been working with the Oregon Department of Energy throughout its rulemaking process to address demand management functionality through the adoption of requirements to support the CTA-2045A hardware and application requirements for electric storage and heat pump water heaters. As such, A. O. Smith strongly supports HB 2062 as introduced and urges the Oregon legislature to adopt the requirements as introduced in HB 2062 without further modification.

Regarding the underlying legislation, A. O. Smith was pleased to see the compliance date align with the latter of the two compliance dates in Washington State allowing for harmonization of these requirements in the Pacific Northwest. It is of the utmost importance that States wanting to adopt demand response functionally be aligned such that the technical requirements be fully harmonized allowing manufacturers to offer products that will seamlessly meet regulatory requirements in multiple jurisdictions as well as assist the market for these products reach scale without the additional costs associated with maintaining different State-specific models. Lastly, A. O. Smith supports the CTA-2045 port and application requirements in the adopted regulation, without modification, as well as the complimentary implementing legislation represented by HB 2062.

In conclusion, A. O. Smith appreciates the opportunity to provide brief comments to the Oregon House and supports the efforts to adopt demand response functionality through the utilization of the

CTA2045 port for electric storage and heat pump water heaters in residences. Please do not hesitate to contact us further if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ashley A. Armstrong". The signature is fluid and cursive, with the first name being the most prominent.

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