

CPSC's RULEMAKING TO TAKE AWAY CONSUMERS' ACCESS TO PORTABLE GENERATORS

CPSC's supplemental notice of proposed rulemaking on portable generators brings great concern to the industry and to consumers and ignores products currently in the marketplace that already mitigate the risks associated with misuse. This proposed rule is unnecessary and overly burdensome. It introduces new hazards and limits consumers ability to obtain portable power when needed:

- Recently, the Portable Generator Manufacturers' Association introduced a voluntary standard, ANSI/PGMA G300-2018 (G300), that effectively addresses the potential CO hazard associated with the of misuse of portable generators (**98.3% effective**), and over 98% of generators manufactured by PGMA members currently comply with the standard.
- The G300 compliant generators include a CO detection system which shuts off the units before the CO accumulates to a hazardous amount. **Over 75%** of generators available in the market have this safety feature which CPSC has not accounted for within its rulemaking. Compliance is anticipated to grow to 85% within the next year.
 - Through the CPSA, the CPSC cannot promulgate a rule when there is a voluntary standard that addresses the hazard and has substantial compliance.
- The CPSC's proposed rule will **prevent** portable generators which provide lifesaving benefits currently in the market with this safety feature from being sold or available to consumers during emergency times of needed power. There are currently **no** generators in the market that comply with the requirements of the proposed rule. The 180-day effective date required by the rule is not enough time for manufacturers to redesign, re-develop, test, and bring new generators to market.
- Generators that comply with the CPSC's rule will **have an increased risk of fires and burns from the extreme** exhaust heat produced by portable generators with lower CO emissions. To date, CPSC has ignored this concern despite repeated outreach and has not provided any information to show that this hazard was analyzed as a part of the rulemaking.
- Consumers will be forced to bear increased cost burden limiting portable power availability to lower income households in emergencies. Generators that comply with the rule will have substantial **increased costs** with limited added benefit. The CPSC's cost benefit analysis is flawed and doesn't address the actual costs to redesign and redevelop portable generators or the effectiveness of G300 compliant generators that are already in the market.

We encourage you to challenge the need for this rule and CPSC's analysis that has many flawed assumptions.