

**State of Hawaii Agencies' Energy Initiatives: Leading by Example, FY 2005-2006**  
**Department of Department of Accounting and General Services**

**Department or Agency: Department of Accounting and General Services**

**Statutory Requirement**

**Act 96 SLH 2006: Buildings and Facilities**

- (1) Design and construct buildings meeting the Leadership in Energy and Environmental Design silver or two green globes rating system or another comparable state-approved, nationally recognized, and consensus-based guideline, standard, or system, except when the guideline, standard, or system interferes or conflicts with the use of the building or facility as an emergency shelter;

**STEPS TAKEN:**

*The Division of Public Works (PWD) already implemented and constructed a pilot project, Waipahu Intermediate School Cafeteria, which is expected to receive a LEED Certified rating. Construction of this project was completed under the DOE due to Act 51, however staff from the Division of Public Works are still actively involved in a working group formed by DBEDT which is reviewing this pilot project and its results.*

*We have already gained experience and learned from the Waipahu Intermediate School Cafeteria project, including just becoming more familiar with LEED or sustainable design. We also have at least one source to identify potential costs impacts from this pilot project.*

*The project only sought a LEED Certified rating due to budget constraints and to some degree the type of facility, which may not allow or provide for enough points in the LEED rating system without being unreasonable in the design and associated costs.*

*The PWD currently has three designated "pilot" projects in trying to achieve a LEED Silver rating. While Act 96, SLH mandates LEED silver or two green globes rating system or other, it also allows for something less by stating "to the extent possible." This statement in the law is hard to define. However, by doing these pilot projects, and committing to achieve a LEED Silver rating, we hope to find out by this experience how feasible it is to achieve a LEED Silver rating and better define "to the extent possible."*

*The three projects are:*

- 1. Kamamalu Building  
Asbestos Removal and Renovation  
DAGS Job No. 12-10-935*
- 2. Manoa Public Library  
Expansion and Site Improvements  
DAGS Job No. 12-36-6364*
- 3. Kohala Public Library  
DAGS Job No. 11-36-6367*

*These projects were chosen as pilots because it would give us a range of experience in applying LEED or sustainable design. The Kamamalu Building project is a major renovation that will be done in phases. The first phase is a core and shell renovation and the second phase will be a tenant improvement project. The Manoa Public Library is an expansion to the existing library and Kohala Public Library is a new library and also located on a neighbor island. In addition, the State Library System is also very supportive in allowing the two library projects to be pilots. The Kamamalu Building is a DAGS building and the Comptroller is also supportive in this effort.*

## STRATEGY:

*The pilot projects above are steps taken, but are also part of developing our strategy. For the immediate strategy, the Division of Public Works will implement projects in accordance with Act 96, SLH 2006 “to the extent possible.”*

*PWD’s general strategy in defining and applying “to the extent possible” is to take the following steps:*

- 1<sup>st</sup> level: Look for and implement sustainable design practices and elements that we do already, thus no impact on operation/function and cost.*
- 2<sup>nd</sup> level: Look for and implement sustainable design practices and elements that we may not have normally done, but can do without negative impact to cost and negative impact to operation/function of the facility.*
- 3<sup>rd</sup> level: Look for and possibly implement sustainable design practices and elements that we may not currently do that are not very costly and improve operation/function of the facility. Associated costs, benefits, budget and maybe even schedule will start to become factors in deciding whether to implement.*
- 4<sup>th</sup> level: Look for and possibly implement requirements that we may not currently do and will impact cost and will improve operation/function of the facility. Associated costs, benefits, budget and schedule will be factors in deciding whether to implement.*
- 5<sup>th</sup> level: And so forth...*

*Part of the strategy also includes knowing what we do not want to do:*

*We shouldn’t implement sustainable design practices and elements that do not offer any real value. We definitely do not want to implement sustainable design requirements to get LEED points just to achieve a rating that does not provide a real value even if the project budget would allow it.*

*As we gain the experience and knowledge from the pilots and the various projects that will occur over the year, we intend to develop a LEED or generically stated, Sustainable Design and Commissioning application guideline and programmatic support for PWD and possibly other State agencies.*

- (2) Incorporate energy-efficiency measures to prevent heat gain in residential facilities up to three stories in height to provide R-19 or equivalent on roofs, R-11 or equivalent in walls, and high-performance windows to minimize heat gain and, if air conditioned, minimize cool air loss. R-value is the constant time rate resistance to heat flow through a unit area of a body induced by a unit temperature difference between the surfaces. R-values measure the thermal resistance of building envelope components such as roof and walls. The higher the R-value, the greater the resistance to heat flow. Where possible, buildings shall be oriented to maximize natural ventilation and day-lighting without heat gain and to optimize solar for water heating. This provision shall apply to new residential facilities built using any portion of state funds or located on state lands;*

## STEPS TAKEN

*PWD very rarely will be involved in residential facilities, however energy-efficiency measures to prevent heat gain can apply to any facility. These measures are already taken into design consideration.*

## STRATEGY

*The strategy for PWD on these measures is finding ways to improve starting just simply by being more aware*

*of these energy-efficiency measures, doing better review of designs, and considering new products and technologies.*

- (3) Install solar water heating systems where it is cost-effective, based on a comparative analysis to determine the cost-benefit of using a conventional water heating system or a solar water heating system. The analysis shall be based on the projected life cycle costs to purchase and operate the water heating system. If the life cycle analysis is positive, the facility shall incorporate solar water heating. If water heating entirely by solar is not cost-effective, the analysis shall evaluate the life cycle, cost-benefit of solar water heating for preheating water. If a multi-story building is centrally air conditioned, heat recovery shall be employed as the primary water heating system. Single family residential clients of the department of Hawaiian home lands and any agency or program that can take advantage of utility rebates shall be exempted from the requirements of this paragraph so they may continue to qualify for utility rebates for solar water heating;

**Steps taken to address this requirement: Assessment / Strategy**

*Although few DAGS facilities utilize enough hot water to make solar water heating cost-effective, our strategy on this measure is to continue encouraging our customers to consider using solar water heating systems in their projects, where feasible and advantageous.*

- (4) Implement water and energy efficiency practices in operations to reduce waste and increase conservation;

**Steps taken to address this requirement: Assessment / Strategy**

*As funding has become available, the department has initiated projects to replace aging air conditioning and elevator equipment that has resulted in improved operating efficiency. DAGS facilities on Oahu have also been retrofitted with energy efficient electronic ballasts and T-8 lamps. The landscape irrigation system at the Kalanimoku Building has been replaced with a system that incorporates rain sensors and a sub-meter as water conservation measures.*

*During fiscal year '07, pilot retro-commissioning projects will be initiated on Oahu, Hawaii, Maui and Kauai to develop strategies that would result in energy savings. The replacement of T-12 fluorescent lamps with energy efficient electronic ballasts and T-8 lamps will be initiated on the neighbor island. The department will also be conducting cost-benefit analyses to determine the feasibility of replacing existing energy efficient electronic ballasts and T-8 lamps with the new Super T-8 lighting ballasts and lamps on Oahu. Also on Oahu, a major effort will be made to repair and upgrade landscape irrigation systems in the downtown civic center to increase water conservation. The department will also be working with the Board of Water Supply to determine the feasibility of using leak detection loggers to locate and repair "phantom" plumbing leaks.*

*DAGS will be looking into cost/benefit analysis for replacing the existing energy efficient electronic ballasts and T-8 lamps with the new Super T-8 lighting ballasts and lamps.*

- (5) Incorporate principles of waste minimization and pollution prevention, such as reducing, revising, and recycling as a standard operating practice in programs, including programs for waste management in construction and demolition projects and office paper and packaging recycling programs;

**Steps taken to address this requirement: Assessment / Strategy**

1. *A program of office recycling (white paper and cardboard) has been in place for several years. However, due to the termination of the recycling contract that was entered into by the Department of Health, DAGS is now in the process of soliciting bids to continue these services. In the future, the department will be looking to expand its recycling efforts.*

2. *A pilot reverse-vending machine program for recycling aluminum cans, glass and plastic has been established at the State Capitol to determine feasibility of the concept. The machines allow individuals to recycle empty containers and receive payment for the containers that were deposited. Although the project is doing well, further analysis of the pilot will continue before expanding to other sites. The machines, which are supplied by Reynolds Recycling, are expensive. In essence, it was determined that*

*the machines must have 24/7 security, hence they should be located inside buildings. We also learned that the State must service (empty) the machines, crush the aluminum cans, and store all the cans, glass and plastics for pick-up. This limits the ease of operating the program at all State facilities.*

- 3. A draft Construction Waste Management Guide Specification (CWMGS) was posted on the PWD website for implementation. A lot of the CWMGS has to do with monitoring and record-keeping of construction waste management. We were informed via discussions with construction industry representatives that these may be additional tasks that take time and money. Unfortunately, if we do away with the monitoring and record-keeping, there is no way that we can "measure compliance". PWD sought input from contractors/vendors/public via on-line surveys and continued participation in the Environmental Committee of the General Contractors' Association for ideas to draft a construction waste management specification which would not add to project cost. Response from the construction industry was sparse, and without a mandate and adequate funding to continue, it lacked the necessary support for full implementation. Once funding for this type of initiative is identified, say, as part of a LEED certification initiative, then the specification can be used.*

- (6) Use life cycle cost-benefit analysis to purchase energy efficient equipment such as ENERGY STAR products and use utility rebates where available to reduce purchase and installation costs; and**

**Steps taken to address this requirement: Assessment / Strategy**

- 1. Mechanical equipment (i.e. A/C, pumps, etc.) have long been required by DAGS to be of high efficiency type and utility rebates have been used to help offset installation and higher pricing costs for the energy efficient products. DAGS has been working with HECO to improve internal procedures to insure utility rebates are not missed.*
- 2. DAGS will be looking into cost/benefit analysis for replacing existing A/C system with new, more efficient, systems even prior to the existing systems reaching their expected life span.*
- 3. Energy Star equipment, where available, will be a standard requirement for all construction.*

- (7) Procure environmentally preferable products, including recycled and recycled-content, bio-based, and other resource-efficient products and materials.**

**Steps taken to address this requirement: Assessment / Strategy**

- 1. The Central Services Division, has begun field testing custodial cleaning products that are environmentally friendly. The goal for fiscal year '07 is to increase the use of such products by 70%. The division is also researching the availability of environmentally friendly products for landscape maintenance application. The department continues to purchase paper and other products that are recycled or have a recycled-content whenever such products are available.*
- 2. The State Procurement Office (SPO) makes available to Executive Departments and other jurisdictions, including the counties, the following price or vendor list utilizing Energy Star, recycled, or EPP products. When other SPO price/vendor list contract terms are due for re-solicitation, the specifications are reviewed and amended to allow for energy efficient products.*

**SPO PRICE AND VENDOR LIST**

***Energy Star Products***

- Copiers and Facsimile*
- Personal Computers and Printers*

***Recycled Products***

- Paper Products, Coarse (i.e. paper towels, toilet paper, etc.)*

- Paper, Recycled Office
- Office Supplies (paper products such as manila folders, etc.)
- Printed materials
- Bags, Disposable Poly (plastic)
- Calendar Refills
- Computer and Printer Supplies (Remanufactured printer cartridges)
- Forms (white paper stock)
- Envelopes

**Environmental Preferable Purchasing (EPP) Products**

- Gasoline and Diesel Fuel, Bulk Deliveries ( E10 regular fuel )
- Gas Fueling and Credit Card Services
- Industrial Supplies (WSCA)

For products not covered by SPO price or vendor list, purchasing agencies utilize the following requirements:

**RECYCLED PRODUCTS PREFERENCE**

Reference: HRS §103D-1005 and HAR Chapter 3-124, Subchapter 4.

- Encourages the use of recycled products by State and county purchasing agencies.
- Provides a preference to all Invitation for Bid solicitations, when it is required or so stated in the solicitation.
- Solicitation shall state the percent of recycled content required to qualify for the preference.
- The solicitation shall state the percentage of the preference be at least five percent of the price of the recycled item, and will be for evaluation purposes.
- State purchasing agencies shall purchase office paper and printed material with recycled content; County purchasing agencies are urged to purchase office paper and printed material with recycled content.

**PREFERENCE FOR OIL PRODUCTS WITH GREATER RECYCLED CONTENT**

Reference: Act 053/1999 establishes HRS §§103D-1301 to 103D-1304.

- Purchasing agencies shall purchase oil products containing the greatest percentage of recycled oil.
- Virgin oil or oil products containing a lower percentage of recycled oil may be purchased provided the recycled oil is:
  - a. Not available within a reasonable time or quantities that meet an agency's needs;
  - b. Not able to meet the performance requirements as recommended by the equipment or vehicle manufacturer;
  - c. Cost is greater than the cost of comparable virgin oil; or
  - d. Likely to breach any warranty requiring the purchase of virgin oil only.

The SPO issued Procurement Circular 1999-07, Sept 21, 1999, to solicit agencies requirements to issue a statewide price list for recycled oil products to be in compliance with Act 053/1999. The resulting price list, **Oils, Lubricants and Greases**, was established to address the requirements listed in Act 053/1999. The SPO has continued to obtain solicitations for recycled oil offering a 5% recycled product preference; however, suppliers have only bid virgin oil.

Note: Suppliers have submitted bids for only virgin oil, the low demand for recycled oil products does not warrant bringing in recycled products, especially since the cost for virgin oil is generally lower than recycled oil. Additionally, no bids have been received for any products (virgin oil or recycled oil) on the island of Hawaii. Possible explanation is that the annual dollars spent for these products by each purchasing agency do not exceed the small purchase threshold of \$25,000. Therefore, both the agencies and suppliers on the island apparently feel it is not necessary to submit requirements or offers.

## **Act 96 SLH 2006: Transportation Vehicles and Fuel**

- (1) Comply with Title 10, Code of Federal Regulations, Part 490, Subpart C, "Mandatory State Fleet Program", if applicable;

### **Assessment / Strategy**

*DAGS Automotive Management Division (AMD) has determined that it is in compliance with the federal requirement by purchasing only new alternative fuel vehicles. AMD recommends that departments determine the applicability of their vehicles or fleet to the federal requirements under 10 CFR, Part 490.*

*The SPO have procured alternative fuel E85 vehicles when requested by Departments of the Executive Branch since January 2000. The Department of Agriculture and Department of Accounting & General Services, Automotive Management Division, have submitted requests and purchased E85 vehicles based on the Alternative Fuel Transportation Program (10 CFR, Part 490).*

- (2) Comply with all applicable state laws regarding vehicle purchases;

### **Assessment / Strategy**

*Act 96/2006, Part IV, amended HRS §103D-412 for energy-efficient vehicles. The SPO is drafting a revision of rules to HAR §3-122-13 to reference the new section of law, which provides the guidance. DBEDT, DAGS-AMD, and the SPO have been collectively working together to draft procedures and guidelines for the purchase of new vehicles for purchasing agencies to implement Act 96/2006 which are expected to be finalized at the beginning of 2007. Under these procedures and guidelines, agencies will have the oversight of the AMD and SPO when making vehicle purchases thru the SPO to ensure compliance with state laws. However, if vehicles are purchased by the agency (small purchase), oversight by the AMD and SPO will not be possible and enforcement of these new procedures and guidelines will be required from the Administrative Services Offices of the agencies.*

- (3) Once federal and state vehicle purchase mandates have been satisfied, purchase the most fuel-efficient vehicles that meet the needs of their programs; provided that life cycle cost-benefit analysis of vehicle purchases shall include projected fuel costs;

### **Assessment / Strategy**

*The review outlined in item (2) above will provide the education to the agencies of new law and after legal mandates have been satisfied, agencies can analyze and evaluate which vehicles best meets their needs.*

- (4) Purchase alternative fuels and ethanol blended gasoline when available;

### **Assessment / Strategy**

*The SPO contracts include the purchase of ethanol-blended gasoline and the SPO will procure alternative fuels when such fuels are available. AMD recommends that agencies prepare for the use of alternate fuels y having their covered fleets with vehicles ready to use E-85 gasoline.*

***SPO Price List for Gas Fueling and Credit Card Services**, currently out for re-solicitation, includes new requirements to establish Monthly reports from the contractors of purchases by each cardholder. **SPO Price List for Gasoline and Diesel Fuel, Bulk Deliveries** currently require contractor monthly reports listing by product, the total gallons purchased and the total dollar amount including all applicable taxes. Information shall be used to determine total gasoline purchases and expenditures by the purchasing agency. The above actions taken will hopefully account for 90% of the gasoline and diesel purchased by the State. There will be situations where Departments are granted exemptions to purchase outside the above price list, or are not a part of this contract, therefore, agency would need to track and report these purchases to determine usage for each vehicle.*

*In addition to above, per the Comptroller Memorandum No. 2005-13 dated May 17, 2005, Departments are required to purchase only regular 87 gasoline unless approval is granted by the Comptroller through DAGS-AMD to purchase premium gasoline or mid-grade gasoline. Current purchases are for E10 regular fuel.*

- (5) Evaluate a purchase preference for biodiesel blends, as applicable to agencies with diesel fuel purchases;  
**Not applicable. Superseded by Act 240 of 2006, which established a 5¢ gallon preference for biodiesel.**

**ACT 240, SLH 2006 (SB 2957) PART III, SECTION 4, BIOFUEL PREFERENCE**

*Summary of the requirements of this new preference:*

- *Contracts for the purchase of diesel fuel or boiler fuel shall be awarded to the lowest responsible and responsive bidders, with preference given to bids for biofuels or blends of biofuel and petroleum fuel.*
- ***Biofuel** is defined as “Fuel from non-petroleum plant or animal based sources that can be used for the generation of heat or power.”*
- ***Biodiesel** is defined as “A vegetable oil-based fuel that meets ASTM International standard D6751, Standard Specification for Biodiesel (B100) Fuel Blend Stock for Distillate Fuels.”*
- *Amount of Preference:  
Biofuel for use in boilers - Five (5) cents per gallon. For blends of biofuel and petroleum based boiler fuel, preference shall be applied only to the biofuel portion of the blend.  
Biodiesel for use in diesel engines - Five (5) cents per gallon. For blends of biodiesel and petroleum based diesel, the preference shall be applied only to the biodiesel portion of the blend.*

*The SPO is drafting Hawaii Administrative Rules of the procurement code to implement this new preference.*

- (6) Promote efficient operation of vehicles;

**Assessment / Strategy**

*DAGS provides guidelines in general operation of vehicles including the efficient use of vehicles.*

*AMD recommend that agencies which operate their own fleets can benefit by providing information to their personnel on improving mileage and keeping vehicles in good operating condition also.*

- (7) Use the most appropriate minimum octane fuel; provided that vehicles shall use 87-octane fuel unless the owner’s manual for the vehicle states otherwise or the engine experiences knocking or pinging;

**Assessment / Strategy**

*See response in (4) above on purchase of regular 87 gasoline.*

- (8) Beginning with fiscal year **2005-2006** as the baseline, collect and maintain, for the life of each vehicle acquired, the following data:

- (A) Vehicle acquisition cost;

**Assessment / Strategy**

*DAGS has this information on file for its vehicles. Other agencies should be able to obtain this information which should be accurate.*

- (B) United States Environmental Protection Agency rated fuel economy;

**Assessment / Strategy**

*This Information should be available at time of solicitation for prior year models and prior model data can also be used for new models if not available.*

- (C) Vehicle fuel configuration, such as gasoline, diesel, flex-fuel gasoline/E85, and dedicated propane;

**Assessment / Strategy**

*DAGS has this available for each vehicle. This information should be available in each vehicles specifications and/or owners manual.*

- (D) Actual in-use vehicle mileage;

**Assessment / Strategy**

*DAGS has this information for each of its vehicles.*

AMD recommends that agencies with fleets that do not have this information will need to estimate it because this requirement of Act 96 was not known to agencies prior to June 2006. AMD would recommend that agencies who must estimate this data do so based on a statewide procedure. Some method include:

- Estimate mileage based on a 3-month period; multiply by 4 to obtain annual mileage.
- Determine the amount of fuel each vehicle consumed in FY 2006 and multiply the amount by the manufacturer's average city/highway driving miles per gallon.

(E) Actual in-use vehicle fuel consumption; and

**Assessment / Strategy**

DAGS has this information for each of its vehicles.

Agencies must obtain amount from actual purchases for each vehicle in FY 2006. If fuel was purchased in bulk and actual numbers of gallons fueled in vehicles cannot be determined, agencies can only estimate fuel consumption. On a prospective basis, AMD recommends that agencies record vehicle miles each time the vehicle is fueled. This would be accomplished using a fueling log sheet. The log sheet would include information such as Department/Program/Year/Make/Model/License and have 5 columns for date, mileage, gallons filled, cost per gallon and comments.

(F) Actual in-use annual average vehicle fuel economy;

**Assessment / Strategy**

DAGS has this information on each vehicle.

Agencies will need to record actual mileage and fuel purchased to arrive at miles per gallon. For agencies who do not have reliable data, they will have to estimate amounts per vehicle. On a prospective basis, AMD recommends that agencies record mileage and fuel purchased at each fill up of fuel as noted in item (E) above.

(9) Beginning with **fiscal year 2005-2006** as the baseline with respect to each agency that operates a fleet of thirty or more vehicles, collect and maintain, in addition to the data in paragraph (8), the following:

(A) Information on the vehicles in the fleet, including vehicle year, make, model, gross vehicle weight rating, and vehicle fuel configuration;

**Assessment / Strategy**

DAGS needs to incorporate the GVW and fuel configuration information into its current reporting system and is working with the Systems and Procedures Office to add this information into one report. This information is easily obtainable from the vehicle registration and owners manual.

(B) Fleet fuel usage, by fuel;

**Assessment / Strategy**

DAGS has the consumption record for all its vehicles.

(C) Fleet mileage; and

**Assessment / Strategy**

DAGS has the mileage record for all its vehicles.

(D) Overall annual average fleet fuel economy and average miles per gallon of gasoline and diesel.”

**Assessment / Strategy**

DAGS currently tracks this information.

## Renewable Energy and Resource Development

All affected agencies and programs are directed to review internal policies, rules, and practices regarding permitting requirements affecting renewable energy development. To the extent possible, permitting policies and practices should be

**streamlined to expedite implementation** of renewable energy projects.

It is requested that agencies prepare by January 12, 2007, a report to my office identifying the **specific steps they have taken to expedite** the approval of renewable energy projects.

### Act 160

(1) Energy consumption in kilowatt hours for the past two years (July 1, 2004 to June 30, 2006)

**FY '05 (kwh consumption); 47,633,924 kwh (includes 7,089,018 kwh for Aloha Stadium)**

**FY '06 (kwh consumption); 48,653,881 kwh (includes 7,358,312 kwh for Aloha Stadium)**

### Act 160

(2) Steps taken to **inventory, investigate, plan, and implement** energy reduction efforts; and

#### **Steps taken**

1. *Mechanical equipment has been replaced as the equipment reaches its expected life span or begins to cause problems, and as funding is available. The new equipment has higher efficiencies due to newer technologies and because the older equipment has decreased in efficiency due to age.*
2. *Working with the service and maintenance contractors to aid in the inventory process which works well since they have the greatest knowledge of the operations and condition of the equipment since they physically see and inspect all of our major equipment on a quarterly basis, at minimum.*
3. *Preparing cost/benefit analysis for replacing existing A/C system with new, more efficient, systems prior to the existing systems reaching their expected life span.*
4. *Preparing cost/benefit analysis to determine if replacing the existing energy efficient electronic ballasts and T-8 lamps with the new Super T-8 lighting ballasts and lamps is cost justified.*
5. *DAGS has been working closely with HECO to streamline the process for tracking projects to ensure and encourage maximum participation in rebate programs.*
6. *The Stadium Authority will take the following steps to reduce its energy consumption:*
  - (a) *Develop an inventory of all incandescent lighting sources, and initiate steps to convert to higher efficiency lighting.*
  - (b) *Initiate a program for turning off all lighting and electrical equipment when not in use.*
  - (c) *Implement a policy where office temperatures in air-conditioned spaces are set at 78 degrees Fahrenheit.*
  - (d) *Lower water heater thermostat settings to 120 degrees Fahrenheit or less.*

### Act 160

(3) A **plan** or alternatives to reduce energy consumption in the future;

#### **Plan or alternatives to reduce energy consumption in the future**

1. *PWD efforts include: developing a LEED application guideline for State agencies; providing LEED and*

*commissioning programmatic support; pilot projects to apply for LEED certification at Manoa Library, Kohala Library and the Kamamalu Building; a pilot retro-commissioning project at the State Capitol; on-going training and partnering with HECO and in conjunction with DBEDT; sub-metering where feasible; updating and implementing additional policies; and keeping abreast of the latest energy reducing innovations and practices.*

2. *The Stadium Authority will be evaluating the following alternatives for reducing energy consumption in the future:*

*(a) Purchasing and using Energy Star listed products whenever possible.*

*(b) Replacing old low-efficiency electrical equipment with higher-efficiency replacement products.*

*(c) Initiate projects to replace air-conditioning insulation.*