

## DOCKETED

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*Comment Received From: Donald Lanser*

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**Nidec Motor Corp. Comments on CEC Proposed Changes to Pool Pumps and Spa Labeling Docket Number: Docket # 15-AAER-02**

I have submitted a word document If you do not receive it call me 314-651-2403

*Additional submitted attachment is included below.*



July 29, 2016

Andrew McAllister  
California Energy Commission  
Appliances and Existing Buildings Office  
1516 Ninth Street, MS-25  
Sacramento, CA 95814-5512

**Nidec Motor Corp. Comments on CEC Proposed Changes to Pool Pumps and Spa Labeling**

**Docket Number:** Docket # 15-AAER-02  
**Pool Pumps and Spa Labeling**

Dear Mr. McAllister,

Nidec Motor Corp. appreciates the opportunity to provide the attached comments on the California Energy Commission's Pool Pump and Spa Labeling Changes to Title 20 appliance efficiency standards.

As you may know, Nidec Corporation manufactures and sells electric motors and related components worldwide. The company offers a wide variety of electric motors including electric motors for swimming pool pumps, air conditioning and air purification systems; home appliance motors for washing machines, refrigerators, and dishwashers; and industrial motors and systems solutions for processing lines, rolling mills, mining equipment, heat pump and water heater systems, elevators, escalators, commercial food refrigerators, floor care equipment, utility vehicles, material handling vehicles, aerial lifts, monitoring systems, barrier-free facilities, electric tools, air compressors, marine propulsion systems, and wind power generation systems. Nidec Corporation was founded in 1973 and is headquartered in Kyoto, Japan.

Please find our comments below. If you have any questions about Nidec's comments, please contact Don Lanser at 314-595-8525 or [don.lanser@nidec-motor.com](mailto:don.lanser@nidec-motor.com)

Sincerely,  
Don

Donald A. Lanser, D. Mgt.  
Director of Marketing Services & Government Relations

**NIDEC MOTOR CORPORATION**



Nidec Motor Corporation thanks the California Energy Commission for the opportunity to provide comments to the proposed changes to the swimming pool pump regulations within Title 20.

In the proposed changes within Table G-5, Standards for Pool Pump Motors Manufacturer on or after January 1, 2019, the proposed efficiency levels are in conflict with the current Federal regulation on small electric motors:

1. The CEC is establishing minimum efficiency for pool motors up to .49 total HP of 70%. This is in conflict to the current federal regulation for 3 ratings:
  - DOE level for ¼ HP Cap start – cap run = 66.6
  - DOE level for ¼ HP 3 phase = 65.6
  - DOE level for 1/3 HP 3 phase = 69.5

Nidec Motor Corporation suggests that these motor efficiencies be revised to conform to the current DOE levels. These levels can be found in Title 10 CFR, chapter II subchapter D part 431 subpart X section 431.446. This allows motor manufacturers to produce and sell the same motor design throughout the United States and not have to design motors that are unique to the state of California.

2. The CEC is establishing a minimum efficiency for pool motors up to 1.0 Total HP of 75%. This is in conflict to the current federal regulation for 2 ratings:
  - DOE level for 1/2 HP Cap start – cap run = 72.4
  - DOE level for 1/2 HP 3 phase = 73.4

Nidec Motor Corporation suggests that these motor efficiencies be revised to conform to the current DOE levels. These levels can be found in Title 10 CFR, chapter II subchapter D part 431 subpart X section 431.446. This allows motor manufacturers to produce and sell the same motor design through the United States and not have to design motors that are unique to the state of California.

3. The CEC is establishing a minimum efficiency for 2 speed and variable speed pool motors of 80% on high speed and 65% on low speed.

Nidec Motor Corporation supports these levels of efficiency.

**NIDEC MOTOR CORPORATION**



4. CEC is also looking for comments on the mix of sales between replacement pool pumps with motors vs. just motors.

Historically, Nidec Motor Corporation believes that the ratio has been 1:1.

Recently, pool pump assembly rebates have become available to consumers. We believe that these sales are now more skewed to replacement of the pump and motor 60% to 40% for just motors.

With increased regulation and no rebates the ratio of pump and motor sales to motor only replacement is likely to shift to 40% to 60%. With 60% of the replacement market going back to only a motor replacement.

We believe this to be true as we've seen similar relationships with respect to motor rewinds versus new motor sales.

Again, thank you for the opportunity to comment on the proposed regulation changes. If you need any clarification or have questions about our comments please contact Don Lanser.