

## DOCKETED

<b>Docket Number:</b>	15-AAER-02
<b>Project Title:</b>	Pool Pumps and Spa Labeling
<b>TN #:</b>	220519
<b>Document Title:</b>	Presentation - Workshop on Appliance Efficiency Regulations for Pool Pumps and Motors
<b>Description:</b>	By Hayward Industries, August 3, 2017
<b>Filer:</b>	Sean Steffensen
<b>Organization:</b>	Hayward Industries
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	8/2/2017 1:13:28 PM
<b>Docketed Date:</b>	8/2/2017



# Workshop on Appliance Efficiency Regulations for Pool Pumps and Motors

August 3, 2017



# Introduction

- Hayward Industries appreciates the opportunity to participate in the development of energy efficiency initiatives for the swimming pool industry and strongly supports the CEC's initiative to develop replacement regulations for pool pump motors.
- We further encourage and support the alignment of these proposed regulations for replacement motors with that of Dedicated Purpose Pool Pumps (DPPP) at the federal level

# Definitions

- As currently proposed, the replacement motor definitions will rely upon the “designed and marketed” definition to identify replacement pool pump motors that can be shown to be intended for use with a pool pump either by the markings on the motor packaging, or through descriptions in catalogs or other publicly available documents. Hayward is concerned that this regulation could potentially be circumvented by a motor manufacturer designating a replacement motor as something other than a pool pump motor.

# Definitions

- Using the DOE pump categories as motor categories could lead to unintended loopholes that would allow lower efficiency motors to be used in applications that require higher efficiency motors. For example, a motor used on both a booster pump and self-priming pump. A motor manufacturer could potentially circumvent part of this regulation by qualifying a replacement motor as a booster pump motor (lower MWEF requirement) while the motor could be used on a self-priming pump with a potentially higher MWEF requirement

# Identical Replacement Motors

- Assumptions made in this proposal should not require pump manufacturers to provide a replacement motor with a higher efficiency than that required for the original pump.
- Pump manufacturers should be allowed to offer the identical replacement motor for their pump, without additional qualification of the motor, regardless of any requirements established as a result of this proposed rulemaking.
- No charge / warranty replacements should be excluded from the scope of this regulations as well.

# Motor Efficiency

- The proposed CEC equation for pool pump motors assumes a pump efficiency of 55%.
- Pump hydraulic efficiencies can vary significantly from this assumption, both in design and speed of operation.
- Use of the identical replacement motor / power end will preserve the original DOE pump efficiency.
- This proposal should not require a replacement motor of a higher efficiency than that required to meet the original DOE WEF requirement.

# Freeze Protection

- Regarding freeze protection requirements, Hayward requests that the CEC align with the Department of Energy guidelines which include that the prescriptive requirements are not applicable if the pump is shipped from the manufacturer with freeze protection disabled.



# Conclusion

- Hayward appreciates the opportunity to speak at this hearing.
- We encourage and support alignment with any DPPP rulemakings at the Federal level.
- Respectfully request that the CEC consider our comments as well as those from the APSP and industry counterparts as it works to develop this rulemaking.

Thank you,