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APSP Pool Pump Motor CEC Presentation

August 1, 2017

Introduction

- APSP and its pool pump & motor manufacturer members are supportive of the CEC's initiative to further advance the efficiency standards for pool pump motors. This is another opportunity for the industry to demonstrate its ability to cooperate with its various constituents, as most recently witnessed via the Department of Energy's (DOE) Dedicated Purpose Pool Pump Working Group and Final Rule.

Item 1: Definitions

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

Item 1: Definitions

- The CEC equation for replacement pool pump motors assumes the pump is 55% efficient, but if a pump is more efficient, then the replacement motors required to meet this Motor WEF would have to be more efficient than the original motors. APSP recommends this be changed; otherwise pump manufacturers would not be able to sell replacement motors.

Item 2: Identical replacements

- Regarding replacement motors, pump manufacturers should be allowed to offer the identical replacement motor for the pump, without additional qualification of the motor, regardless of any requirements established as a result of this proposed rulemaking.

Item 3: Freeze protection

- Regarding freeze protection, APSP requests the CEC adopt and align with the federal DOE guidelines, which include that if the pump is shipped with freeze protection disabled, the prescriptive requirements do not apply.

Item 4: timing of DOE vs CEC regulations

- The federal dedicated purpose pool pump regulations go into effect July 2021. APSP recommends CEC align the implementation of its revised efficiency standards for pool pump motors with the federal DPPP rule so that the industry can prepare for both concurrently.

Item 4: timing of DOE vs CEC regulations

- Alternatively, APSP recommends that if DOE determines to move forward with a federal regulation on pool pump motors, we would respectfully ask the CEC to postpone pump motor regulations altogether for the DOE rule, which we believe would preempt any CEC pool motor regulation. It is the industry's position that any DOE pump motor rule be implemented as close to the DPPP July 2021 date as possible.

Conclusion

- The pump & motor manufacturers have a long history of working with regulators and energy advocates on higher efficiency standards – our work with both the CEC and the DOE, represents our commitment. We are pleased to see the CEC working to address loopholes that have been created in regards to replacement pool pump motors and we hope it will encourage the federal government to follow suit.

Conclusion

- We look forward to working with all parties to deliver an effective set of efficiency standards for pool pumps motors and align such regulations to ensure consumers realize the maximum benefits. To that end, APSP respectfully requests that the CEC consider our comments as well as those provided by our member companies as it develops its final rulemaking.