

## DOCKETED

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<b>Project Title:</b>	Pool Pumps and Spa Labeling
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<b>Document Title:</b>	The Association of Pool & Spa Professionals Comments on Pump Motor Proposal
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*Comment Received From: The Association of Pool & Spa Professionals*

*Submitted On: 9/1/2017*

*Docket Number: 15-AAER-02*

**on Pump Motor Proposal**

*Additional submitted attachment is included below.*

September 1, 2017

Submitted Electronically: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

California Energy Commission  
Docket Unit, MS-4  
Re: Docket No. 15-AAER-02  
1516 9th Street  
Sacramento, CA 95814-5512

To Whom It May Concern:

The Association of Pool & Spa Professionals (APSP) has been proactive in supporting energy efficiency through the adoption of the APSP-15, American National Standard for Residential Swimming Pool and Spa Energy Efficiency, work on national legislative and regulatory efforts, including the recent Department of Energy (DOE) Dedicated-Purpose Pool Pump Rule as well as working with the California Investor Owned Utilities (CAIOU's) in supporting Title 20 and the update of this regulation. 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.

APSP stands in general agreement with what the CEC has proposed but for the comments and suggestions provided to the CEC in the PowerPoint that was delivered at the August 3 workshop (attached herein). Since the CEC workshop, the APSP and its pump and motor manufacturers participated in the August 10, DOE public meeting on a possible dedicated-purpose pool pump motor rule. Based on that meeting, the industry now intends to move forward with private negotiations, and work with all stakeholders and the DOE to ensure a federal pump motor rule is implemented as close to the Dedicated-Purpose Pool Pump Rule July 2021 date as possible. We believe this approach is best for regulators, consumers, energy advocates and the pool & spa industry.

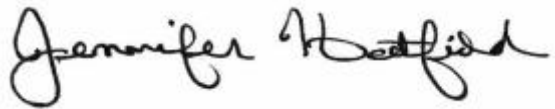
Therefore, as initially noted within our PowerPoint, APSP respectfully recommends to the CEC they postpone the pump motor regulations being considered altogether and instead work with us and others with an interest in ensuring a federal dedicated-purpose pool pump motor rule is finalized to guarantee consistency with the Dedicated-Purpose Pool Pump Rule that now exists as well as ensure no loophole exists by not covering the replacement pump motor aspect. Alternatively, APSP recommends CEC at a minimum consider aligning the implementation of its revised efficiency standards for pool pump motors with the federal DPPP rule so that the industry can do its best to prepare for both concurrently.

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. You will not find another industry group more supportive of efforts to increase energy efficiency

standards in the pool and spa industry. 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 herein today, along with the August 3 PowerPoint as well as any comments provided by our member companies.

We thank the CEC for its time and consideration.

Respectfully submitted,

A handwritten signature in black ink that reads "Jennifer Hatfield". The signature is written in a cursive style with a large initial "J" and "H".

Jennifer Hatfield  
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