

DOCKETED

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Project Title:	Pool Pumps and Spa Labeling
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Comment Received From: Brian Lamberty
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Pool Pumps and Spa Labeling

Additional submitted attachment is included below.



Intermatic Inc.
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Date: 1-4-2019

Docket Number: !5-AAER-02
Project Title: Pool Pumps and Spa
Labeling TN Number: 225892
Title: Notice of Staff Workshop on Appliance Efficiency Regulations for Replacement Pool Pump Motors
Description: California Energy Commission staff will conduct a public workshop to seek comments from interested parties on the staff analysis proposing appliance efficiency regulations for replacement pool pump motors. These topics will be considered as possible amendments to the Appliance Efficiency Regulations. November 28, 2018 at 10:00 a.m.
Filer: Sean Steffensen
Organization: California Energy
Commission Role: Commission Staff
Submission Date: 11/14/2018 I:
19:14 PM Docketed Date:
11/14/2018
Subject(s): Efficiency

To whom it may concern,

We welcome the opportunity to offer comments regarding the California Energy Commission Replacement Pool Pump Motor Pre- Rulemaking.

Intermatic Inc. is a 127 year old company manufacturing electrical control solutions primarily for the purpose of energy management Our products are sold in the Electrical Distribution, HVAC/Rand Pool and Spa channels. We are headquartered in Spring Grove, Illinois.

Our Pool and Spa product portfolio consists of Timers, Low Voltage Transformers, wireless automation control systems, and breaker panels that integrate with a wide variety of dedicated purpose pool pumps, and other auxiliary discrete electrical loads tied to a completed Pool and Spa system. We do not provide pumps or any other pool electrical operating equipment. However, our timers and controls have been used to manage and reduce the energy consumption of these electrical loads since 1958.

While we support the initiative to conserve energy consumed by pool pumps, we have strong concerns that the Direct Final Rule, as proposed, will have a severe negative impact to our competitiveness, particularly, the requirement that pumps be sold in commerce with a pool pump timer that is integral to the pump.

We request a change to the language that a Dedicated Purpose Pool Pump "shall be distributed in commerce with a pool pump timer that is either integral to the pump or a separate component that is shipped with the pump" be changed to "A timer must be installed with the replacement pump motor and must be scheduled to meet a 10 hour maximum run time or less". Timers may not always be packaged and shipped with a replacement pump motor and this change will ensure a timer is always installed with all replacement motors to meet the IO hour maximum run time. Also, timers are already commonly installed with a dedicated purpose pool pump and the scheduled run times are based on pool size, ave. temps, GMP calculations to achieve optimal turnover rates. A timer integral to a pump may not be needed for a replacement motor if a timer is already installed. Redundant time control could add unnecessary cost to the replacement if a timer is already installed.

We hope our proposed revision is clear. Please feel free to reach out to us with any questions.

Respectfully,

Brian Lamberty
Product Manager
Intermatic Inc.