

DOCKETED

Docket Number:	20-FDAS-01
Project Title:	Flexible Demand Appliance Standards
TN #:	240194
Document Title:	Hayward Industries, Inc Comments - on Flexible Demand Appliance Standard
Description:	N/A
Filer:	System
Organization:	Hayward Industries, Inc.
Submitter Role:	Public
Submission Date:	11/1/2021 2:34:01 PM
Docketed Date:	11/1/2021

Comment Received From: Hayward Industries, Inc.
Submitted On: 11/1/2021
Docket Number: 20-FDAS-01

Comments on Flexible Demand Appliance Standard

See attached letter.

Additional submitted attachment is included below.



POOL PRODUCTS
One Hayward Industrial Drive
Clemmons, NC 27012
1.336.712.9900
www.haywardnet.com

November 1, 2021

Submitted via: Docket Log 20-FDAS-01

Commissioner J. Andrew McAllister, Ph. D.
California Energy Commission
Docket Office, MS-4
1516 9th Street
Sacramento, CA 95814

RE: Comments on Flexible Demand Standards, Docket # 20-FDAS-01

Dear Commissioner McAllister:

Hayward Pool Products is a division of Hayward Industries, a North Carolina based company, and is one of the world's leading manufacturers of swimming pool equipment including pumps, filters, heaters, automatic cleaners, sanitizers, automation and lights. We have been an active participant in the California Energy Commission efforts to establish regulations on Pool Pumps and Motors, and appreciate the opportunity to participate in development of this new Flexible Demand Appliance Standard.

We submit the following responses to your Request for Information and welcome your careful consideration of these comments. and look forward to an outcome that meets our expectations. If you have any questions on these comments, please contact Sam Dose of Hayward Industries at sdose@hayward.com.

Sincerely,

Sam Dose

Sam Dose
Energy and Legislative Consultant
Hayward Industries, Inc.
336-918-9979

Request for Information on California's proposed Flexible Demand Appliance Standard, Docket #20-FDAS-01.

General Comments:

Hayward fully supports and endorses the comments submitted by PHTA regarding this standard and offer the following additional information.

- 1) Table 2 Scoping Matrix
 - a) Hayward recommends inclusion of Swimming Pool Heat Pumps in the scope of this standard. Heat Pumps are second only to pool filter pumps for swimming pool energy consumption and with the decarbonization efforts in California, Heat Pumps could become the major source for heating pools.
 - b) Hayward recommends the exclusion of controls for larger pumps. This could be aligned with the DOE Residential Swimming Pool Pump Rule, or California's Replacement Swimming Pool Motor Rule, (excludes controls for pumps equal to or greater than 5 THP).
- 2) Table 4 Appliance Stock Numbers
 - a) Pool Pump Controls
 - i) Hayward's estimates will be determined by CEC's final draft of scope and definitions, however current market trends would indicate a much higher growth rate than your projected 0.625% annual growth.
- 3) Table 8 Cybersecurity
 - a) The table as presented appears complex and difficult to navigate. It is Hayward's understanding that CEC will use these listed resources for crafting your specific, minimum requirements for FDAS, and we support this approach.
- 4) Appliance Specific Questions
 - a) Pool Pump Controls
 - i) Hayward would recommend specific language to exclude the following from the scope of this rule: simple on/off switches for DOE approved Single Speed pool pumps, and simple speed switches for DOE approved Two Speed pool pumps.