

DOCKETED

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NEMA Comments on Pool Controls Rulemaking

Members of the Motor & Generator Section of the National Electrical Manufacturers Association are pleased to submit these comments on the pool controls rulemaking, with our thanks for the opportunity.

Additional submitted attachment is included below.



National Electrical Manufacturers Association

July 10, 2023

Submitted via: Docket Log 23-FDAS-01

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

Re: NEMA Comments on Pool Controls Rulemaking, Docket # 23-FDAS-01

Dear Commissioner McAllister:

As the leading trade association representing electrical equipment and medical imaging manufacturers, the National Electrical Manufacturers Association (NEMA) submits the following comments regarding the California Energy Commission Pool Controls Rulemaking (Docket # 23-FDAS-01).

NEMA represents some 325 electrical equipment and medical imaging manufacturers that make safe, reliable, and efficient products and systems, including dedicated purpose pool pump motors (DPPPMs). Our combined industries account for 370,000 American jobs in more than 6,100 facilities covering every state. Our industries produce \$130 billion in shipments of electrical equipment and medical imaging technologies per year with \$38 billion in exports.

If you have any questions on these comments, please contact Fern Abrams of NEMA at fern.abrams@nema.org or (703) 841-3211.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Baker', written in a cursive style.

Alex Baker
Director, Regulatory Affairs

NEMA Comments on CEC Flexible Demand Appliance Standards for Pool Controls

NEMA and its members who manufacture dedicated purpose pool pump motors (DPPPM) support the California Energy Commission's (CEC) efforts to reduce energy consumption from pool pumps operating at unnecessarily high levels through establishing flexible demand appliance standards (FDAS) for pool controls.

Unfortunately, the proposed definition of "pool control" and "pool controls" would unintentionally include DPPPM within scope, thereby requiring motors that were not designed or intended to be used to control the entire pool system to comply with the FDAS for pool controls. As a result, consumers would be forced to purchase an entire pool pump system in situations where a replacement DPPPM would suffice. Since DPPPM are not designed to function as pool controls, by unintentionally including them within the scope of the pool control definition, CEC would inadvertently eliminate DPPPM products from the marketplace.

In the letter submitted by the Pool & Hot Tub Alliance (PHTA) on April 10, 2023, PHTA proposed the following modifications to the pool control(s) definition. NEMA supports this proposed language, since it would exclude DPPPM from the scope of the definition. DPPPM should not be included as a pool control that must be a communicating device.

Definitions, Section 1691(b)

Modifying as follows:

"Pool control" and "pool controls" mean any component or group of components, including software, that:

- (1) For integral dedicated purpose pool pump controls, has the capability to independently schedule the operation and/or control the start or stop times of a pool filter pump and other pool equipment, and uses single-phase AC power as input power;
- (2) For other than integral dedicated purpose pool pump controls, has the capability to independently schedule the operation and/or control the start or stop times of a pool filter pump, and uses single-phase AC power as input power; or
- (3) Includes, but is not limited to, a pool timer, pool pump switch, heater switch, or direct load control switch.
- ~~(4) Has the capability to start or stop the operation of a pool filter pump and other pool equipment, and~~
- ~~(5) Uses single phase AC power as input power.~~

"Pool control" and "pool controls" exclude controls marketed exclusively for uses as a control for pool filter pumps with a rated hydraulic horsepower (hhp) greater than 2.5 hhp.