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Additional pump & motor comments 3.21.16

Additional submitted attachment is included below.



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March 21, 2016

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

To Whom It May Concern:

The following is submitted on behalf of the Association of Pool and Spa Professionals (APSP) in response to the California Energy Commission (CEC) Staff report on the Analysis of Energy Efficiency for Pool Pumps and Motors, and Spas. In our initial February 29, 2016 response addressing pumps and motors, we provided information on PMSM motors for portable pools. The following additional information on these specific types of motors should also be considered, along with the initial comments provided:

PMSM motor portable pool pumps information:

- Duty: 6 hours minimum per day per CDC guidelines but at least 1 volume turnover per day
- Motor design life: 3 years
- Capacity: Very low capacity starting at as little as 0.01 HP and ranging to ca. 0.1 HP (PMSM motor), depending on model. CSCR motor portable pool pumps start at approximately 0.25 HP and range to 0.95 HP (they do not exceed 1 HP).
- Cost: suggested retails for PMSM portable pool pumps are in the range between \$35 and \$50 depending on model. In comparison, the smallest CSCR motor portable pool pumps start at around \$100 retail and range up to \$250.
- Motor efficiencies: Measurements have been difficult to perform on these low power motors, but initial testing indicates efficiencies around 40% for the PMSM motor portable pool pumps. The actual energy use is, however, very low, as presented during the public hearing.

We thank the CEC for its time and consideration.

Respectfully submitted,

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