

DOCKETED

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Pool Pump Controls

Additional submitted attachment is included below.



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Date July 27, 2016

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

Subject; Intermatic Incorporated Comments on Pool Pump Motors and Portable Electric Spas
2015 Appliance Efficiency Pre-Rulemaking.

Dear Commissioner McAllister:

We welcome the opportunity to offer comments in support of the California Energy Commission's (CEC) proposed Title 20 standards for Pool Pump Motors and Portable Electric Spas.

Intermatic is a manufacturer of Timers, Energy Management Controls, Pool controls, Pool lighting Transformers, and Surge Protective Devices with headquarters in Spring Grove, Illinois. Our Pool and Spa channel offers a variety of stand-alone controls that integrate with virtually every type of pool equipment. These include full wireless automation systems, timers, and control panels which are capable of controlling all types of pumps, heaters, lighting, sanitizers and other components. Many of our control systems also offer freeze protection. This approach allows for the control of energy for both small applications and larger in-ground pool applications. It also provides consumers with an unbiased choice as to the type and scope of control that best suits their needs.

We support the initiative to manage and list the efficiency of pool pump and motor combinations with the use of pool controls. We recommend the listing of separate independent controllers, such as Intermatic's, from controls that are integrally-mounted on the combination pump and motor.

In addition, we request that the suggestion by the Association of Pool & Spa Professionals (APSP) presented during the July 13, 2016 pre-rulemaking workshop requiring integrally mounted controls on all pumps greater than or equal to 1 hp not be considered since it would limit the types of controls which are independent. In other words, we believe it would introduce bias into the consumer's decision making process which could result in overlooking the energy and cost saving benefits of an independent controller that would control all of the pool equipment. In addition, in the event of replacement, the pump, motor, and control would need to be replaced if integral whereas an independent control would not.

We also support the inclusion of freeze protection and recommend this control be listed as well.

We appreciate your consideration and look forward to your review.

Should you have any questions please contact the undersigned.

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