

DOCKETED

Docket Number:	15-AAER-02
Project Title:	Pool Pumps and Spa Labeling
TN #:	221001
Document Title:	Hayward Comments Requesting CEC Postpone Proposed Replacement Motor Regulations
Description:	N/A
Filer:	System
Organization:	Hayward/Scott Petty
Submitter Role:	Public
Submission Date:	9/1/2017 1:09:11 PM
Docketed Date:	9/1/2017

Comment Received From: Scott Petty

Submitted On: 9/1/2017

Docket Number: 15-AAER-02

Hayward Comments on CEC Docket No 15-AAER-02

See attached PDF

Additional submitted attachment is included below.



September 1, 2017

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 15-AAER-02
1516 9th Street
Sacramento, CA 95814-5512

To Whom It May Concern:

Hayward Pool Products, a division of Hayward Industries Inc., respectfully requests that the CEC postpone their proposed replacement motor regulations and focus on the pending federal Dedicated Purpose Pool Pump (DPPP) Motor rulemaking in association with manufacturers, energy advocates, and the Department of Energy (DOE). This will allow both pump and motor manufacturers to prepare concurrently and help assure consistency between the federal regulations.

If the proposed California motor regulations are not postponed, we support the CEC's stated goal to align as much as possible with the published federal DPPP regulation as discussed during the CEC workshop held on August 3, 2017. As stated during that meeting and in the subsequent DOE pool pump motor meeting on August 10, 2017, Hayward supports the CEC's proposed motor weighted factor (MWEF) as it more closely aligns technical requirements between the pump and motor-only as compared to previous proposals that largely relied on motor efficiency.

Additional comments regarding the latest Staff Proposal:

- 1) We recommend the CEC revisit the "split" used to identify "small" self-priming pool pump motors. The current proposal is 1.0 total horsepower (THP); the comparable metric from the federal DPPP rule is 0.711 hydraulic horsepower (HHP). The latter was based on data provided by manufactures to the DOE and while there is no direct correlation between THP and HHP, the average split was higher than 1.0 THP. Hayward recommends that the CEC work with the DOE and/or manufacturers to obtain the data (with the prerequisite of all appropriate confidentiality terms in place) and adjust the motor replacement split to more closely align with 0.711 HHP.
- 2) As currently proposed, the equipment classes will rely upon the "designed and marketed" definition to identify replacement pool pump motors. Hayward is concerned that this regulation could potentially be circumvented by a designating a replacement motor as something other than a pool pump motor. This topic was discussed during the DOE meeting on August 10 and the industry will need time to evaluate these possible alternatives.



- 3) Pump manufacturers should be able to offer no charge/warranty motors identical in performance to the one(s) utilized to meet state and federal requirements, without requiring any additional testing of the motor.
- 4) Hayward requests that the CEC align with the DOE guidelines for freeze protection which include that the prescriptive requirements are not applicable if the product is shipped from the manufacturer with freeze protection disabled.

Hayward is very thankful to the CEC for the opportunity to participate in the proposed replacement motor regulation. As a leading equipment manufacturer, representing thousands of employees and, in turn, thousands more pool professional partners and their customers, we request your thorough evaluation of these issues.

Sincerely,

A handwritten signature in black ink that reads 'Scott K. Petty'.

Scott K. Petty
Global Product Manager - Pumps and Filters
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