

## DOCKETED

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<b>Project Title:</b>	Pool Pumps and Spa Labeling
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<b>Document Title:</b>	Regal Comments regarding Replacement Pool Pump Motors
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*Comment Received From: Chandra k Gollapudi*

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**Comment regarding Replacement Pool Pump Motors**

*Additional submitted attachment is included below.*



September 1, 2017

Commissioner McAllister and Energy Commission Staff  
California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 15-AAER-02  
1516 Ninth Street  
Sacramento, CA 95814-5512

Subject: Response to staff workshop regarding Replacement Pool Pump Motors

We appreciate this opportunity to comment and offer our feedback regarding the Draft Replacement Pool Pump Motor efficiency standard. Regal is an American manufacturing company with significant operations in the State of California. We are a global leader in innovative solutions that convert power into motion for customers in industrial, commercial, and consumer industries in the U.S. and worldwide.

We applaud the intention of the commission to set standards similar to the DOE Dedicated Purpose Pool Pump (DPPP) regulation and the metric Weighted Energy Factor (WEF) with the goal of aligning California regulations with future Department of Energy (DOE) DPPP Motor regulation. We would like to submit our comments regarding timing, scope and test procedure of the rule that will help reduce the burden to all stakeholders, and to eliminate inconsistencies in the industry because of this rule so that the California Energy Commission (CEC) achieves the desired intention of the rule.

Following are our comments, and we will be happy to work with the CEC should there be follow up questions or clarifications required.

**Scope:**

1. CEC's proposed replacement motor rule would be effective January 2019 whereas DOE DPPP rule goes into effect on July 18, 2021. During this two and a half year period replacement motors will be affected adversely because variable speed replacement motors will be more expensive than fixed speed or single speed replacement pumps that will continue as an uncovered product if not applied in a residential filter pump. The current service segment is already an uneven playing field in California since the IOU's offer rebates for Variable Speed (VS) Pumps but surprisingly do not offer rebates to VS Replacement Motors (PG&E is the only exception). If CEC rule only covers "replacement pool pump motors", the service segment will become more uneven favoring subsidized VS Pumps and non-compliant single speed pumps. This would adversely impact motor suppliers and pool owners as well as diminish the objective of this regulation to conserve energy. Regal recommends that CEC motor rule should apply to all DPPP motors delivered to the pool pump industry in any form (pump, power end, or motor), and not just replacement motors. This will level the playing field between replacement motors and pool pumps by having similar standards, and will increase the enforcement in the industry with a clear and concise DPPP Motor regulation.
2. If CEC is unable to accept recommendation #1 above, then Regal requests to postpone the implementation of "Replacement DPPP Motors" and align with DOE's DPPP rule and also, directly adopt the outcome of DOE's DPPP Motor rule.
3. In the staff workshop on August 3, 2017, it was pointed out that partial pumps are sold in the industry as "Power Ends." We recommend CEC to include motors on Power Ends and on complete pool pumps in the scope of the regulation as a covered product.

4. Most of the energy savings in pool pump motors are realized in 1.x THP and greater self-priming inground pools with a Square Flange or C-Face design required for self-priming. It will be much easier to align the regulation with DOE DPPP rule if CEC will focus the scope of the regulation on pool pump motors > 1.x THP with Square Flange or C-Face, designed and marketed for self-priming swimming pool pumps. This will allow CEC to realize the desired energy savings while reducing potential negative impacts on non DPP Pumps and Motors such as Spa Pumps and Motors which are regulated separately as an appliance.
5. Spa and Above Ground Pool Motors should be exempt from this regulation because it is not possible to distinguish between the motors used in either application based on physical characteristics.
6. Regal recommends that CEC not cover Pool Pump Motors less than 1.x THP with new regulations to avoid overlap and confusion on Spa Pump Motors, Booster Pump Motors, Waterfall Pump Motors, and Above Ground Pool Pump Motors. The most significant energy savings in Pool Pump Motors are realized in 1.x THP and greater self-priming inground pools with a Square Flange or C-Face design required for self-priming filter pumps.
7. Regal recommends that CEC consider EL6 equivalent coverage with Motor WEF or prescriptive VS Motor standard at THP equal to or greater than 1.x THP instead of 1.0 THP to better align with the DOE DPPP rule. The 1.x THP value should be determined with the consensus of the pool pump manufacturers.

**Pool Pump Motor Definitions:**

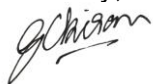
1. Regal is concerned that CEC's approach to use "designed and marketed" to identify pool pump motors is not enforceable in the field. Regal recommends adding physical characteristics such as Square Flange and C-Face and an industry standard such as 'UL1081 ready'.

**Motor WEF:**

1. Prescriptive Standard: As stated above, the vast majority of energy savings potential is in standard-size self-priming pool filter pumps. These motors are designed with Square Flange or C-Face mounting and marketed for inground pool pumps. To reduce the burden of a new metric and test procedure, Regal requests as an alternative that CEC consider a prescriptive requirement for standard-size self-priming pool filter pump motors to be variable speed type, or capable of operating at 3 or more speeds including a low speed that is equal to or less than 50% of maximum speed.

Thank you once again for the opportunity to provide these comments. We greatly appreciate CEC's efforts in seeking public input regarding DPPP motors. We welcome further dialog with you.

Sincerely,



Chandra Gollapudi  
Government Affairs Director  
Regal Beloit Corporation