

DOCKETED

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See attached comments

Additional submitted attachment is included below.



April 6, 2020

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Comments regarding the Final Staff Report and Proposed Regulatory Language – Replacement Dedicated Purpose Pool Pump Motors (Docket # 19-AAER-02)

Submitted via e-comment

Dear Chairman McAllister and Commissioners,

On behalf of the Natural Resources Defense Council (NRDC), we support the California Energy Commission's (CEC) Final Staff Report and Proposed Regulatory Language, which will provide statewide standards for replacement dedicated-purpose pool pump motors (RDPPPM). The proposed standard is cost-effective, technologically feasible, and closes an important loophole.

While there is a federal standard for dedicated-purpose pool pumps, which takes effect July 19, 2021, there is not a national standard for the replacement motors that are used by those pumps. This creates a loophole, where new pumps would have to meet the standard, but upon motor failure, the motor could be replaced with a much less efficient model. NRDC was involved in negotiations with manufacturers, states, and advocates to develop a national RDPPPM standard. While we came to an agreement, the U.S. Department of Energy has yet to act on finalizing the standard. In absence of federal action, the CEC is moving forward with a strong standard for California, which will provide certainty and savings to the largest pool market in the country.

The proposed standard will apply to all pool pump motors between 0 and 5 total horsepower, sold for both residential and non-residential application.

NATURAL RESOURCES DEFENSE COUNCIL

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This clarifies language in the existing standard for replacement motors. The California standard will take effect consistent with the federal standard for dedicated-purpose pool pumps, which ensures that all pool pump and motor products sold in California will be efficient.

The benefits to consumers are significant. By 2029, when the pool pump motor stock turns over, Californians will save more than 450 GWh of electricity, equivalent to around \$82 million in annual electricity savings. Residential pool owners will save between \$70 and \$1,750 in costs, and commercial pool customers will save even more – between \$5,800 and nearly \$11,000 over the lifetime of the motor. Manufacturers have products available today that meet the standard, so we do not anticipate issues with supply.

NRDC commends the CEC for their leadership to improve RDPPPM standards to save Californians energy and money while providing regulatory certainty for the pool market. We support the proposed standard and urge the CEC to finalize it as soon as possible.

Sincerely,

A handwritten signature in black ink that reads "Lauren Urbanek". The signature is written in a cursive, flowing style.

Lauren Urbanek
Senior Energy Policy Advocate