

PRECISION POOL SERVICE

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Calif CSLB # 790843

DOCKET 07-AAER-3
DATE _____
RECD. MAY 14 2000

To: California Energy Commission

Subject: Comment to Docket 07-AAER-03-B
Robert Nichols

I have been in the swimming pool service and repair industry for over 25 years and hold a CSLB C-61 D35 contractors license.

With consultation among many others in the swimming pool service and repair business I urge the committee to not change the current language of Title 20 in regards to direct replacement of swimming pool pump motors. Our industry and the thousands of customers we have serviced have always made every effort to reduce energy consumption and maintain a healthy environment for our clients. As manufactures have produced more efficient pumps for our industry we have been at the forefront to convince clients that energy use reduction was good for them and the community with overwhelming success, without regulation.

Following are a few points that I would like to offer for your consideration.

1. Service Factor (SF)
Pumps do not have a service factor. Pumps are installed by flow curve performance based on the hydraulic design required for the swimming pool as built, based largely on health department requirements or recommendations. These requirements are part of the building codes in many municipalities and pertain to residential swimming pools as well as commercial or private facilities. Therefore to consider service factor in the total horsepower rating of a pump is completely incorrect. I would urge you again to consider not including the SF factor in your regulation. Also, please consider the language change of GREATER THAN 1 hp on the requirements as a trigger for Title 20 regulation.
2. The included regulation that timer controls must be able to control a minimum of 2 functions is not a good policy. There is no need to increase the installation cost to the consumer if a multi function timer mechanism is not required to operate a pump that is not regulated. Please consider new language or removing this requirement. Variable speed pumps normally require more than a 2-function timer control.
3. In California there are two types of replacement motors available from distribution, one is defined as "energy efficient" the other is not.

- I would suggest that you consider only “energy efficient” replacement motors be allowed for sale in California. Proper labeling of regulated pumps and motors, integral or not, should be a requirement that would alert consumers
4. Many of California’s swimming pool owners have older pools that will not perform on 2 speed pumps and the high cost of electrical upgrade and the installation of a variable speed pump system is out of reach for many consumers. Rebate programs from PG&E and So Cal Edison may help, however; the initial cost to the consumer will be an extreme burden on thousands of fixed or low-income families, usually the owners of existing older swimming pools. So Cal Edison and PG&E have withdrawn their installed rebate requirement that the installer be a California Contractor thereby rewarding unlicensed contractors. At this point the cost of installing a new pump motor is usually below the \$500 contractor requirement, if you do not consider allowing the trade to install 1 hp motors and below as a direct replacement repair there will be thousands of small business operators either operating illegally or be out of business. Again please consider the language change to “greater than 1 hp” and do not include the manufactures service factor in the Title 20 language.
 5. Enforcement of Title 20 is non existent beyond new construction permit inspection, unless a permit is required to upgrade electrical service to existing pools. The lack of regulatory enforcement in reality makes the title voluntary to the do it yourself consumer or unscrupulous individuals that may prey on the community. Enforcement needs to be addressed to make the requirements successful. Labeling plays a part in enforcement.
 6. In the beginning rulemaking of Title 20 the premise was based on the design of hydraulics for new construction and then moved for greater energy savings to the replacement of pumps on existing pools and then to the replacement of pump motors on existing pools. For the most part energy conservation has been the responsibility of the swimming pool service and repair industry with little help from the utility works that now want to regulate an entire industry with little regard for the consumer. Public notification of the impending regulations has not been forthcoming
to the extent that the community affected by Title 20 has been made fully aware of the regulations impact. This is not a good practice if the utility works want the full cooperation of their customers.
 7. In clarification please consider language changes indicating new construction requirements, retrofit requirements and service/repair requirements. Within Title 20 all three of these areas have various areas of compliance and it would be beneficial to the understanding of regulation.
 8. If swimming pool pumps/motors are to be considered an “appliance” then labeling of efficiency rating should be included, so that the consumer can be made aware of the performance of the individual products at their disposal.

Respectfully submitted,
Bob Nichols