



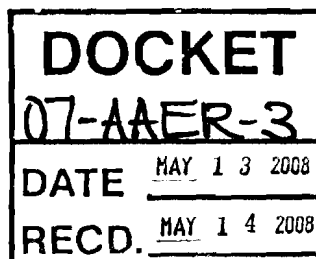
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POOL & SPA  
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May 13, 2008

To: California Energy Commission

Re: Comment to Docket 07-AAER-03-B



IPSSA is a nonprofit organization representing independent swimming pool and spa service technicians. Our membership totals more than 3,700 technicians across the nation, serving nearly 500,000 clients. We welcome the opportunity to make comment to the California Energy Commission on Title 20.

Our Board of Regional Directors urges the CEC to retain the current language of Title 20 as it pertains to the direct replacement of swimming pool pump motors. The entire swimming pool service and repair industry in California will, in effect, be turned upside down should you find that replacement motors be included in the code.

We further request that you consider the following points in your deliberation:

1. **Service factor.** Service factor as stated on motors is the maximum rated load for the motor. It has nothing to do with the pump capability, and a  $\frac{3}{4}$  hp pump will still perform as manufactured regardless of the service factor on the motor. We would urge you to not include in the language the added calculation of service factor. We additionally request that you consider language change to include "greater than one hp" rather than "one hp and above".
2. **Timer controls.** As defined, two-speed motors will require two function timers. However, unregulated motors will not, therefore this requirement is not necessary. Variable speed and variable flow motors require a more sophisticated control system, therefore the two-function timer is obsolete before it is installed. The requirement adds extra expense to the installation that can be avoided. Two function controls are only necessary on two speed motors.
3. **Energy efficient.** In California there are two motors available for installation. One motor is termed "energy efficient" the other is not. We recommend that only energy efficient motors be sold as replacement motors for any pump system, filtration or water feature.
4. **Unlicensed-licensed contractors.** Thousands of family owned swimming pool service businesses flourish in California. Many do not require a contractor's license for the work they perform. The average cost to replace a motor on a pump does not exceed the \$500 threshold for a contractor's license, however, if Title 20 requires the replacement of pump motors to be two-speed or multi speed, these individuals will be out of business. There will be no gain for the consumer when unscrupulous operators fill in the gap in this regard.

5. **Enforcement.** Enforcement of Title 20 is non-existent beyond permit inspection for new building of swimming pools, unless a permit is required for electrical upgrade. The lack of regulatory enforcement in reality makes the code voluntary for the “do-it-yourself” consumer or unscrupulous individuals who may prey on the community. Proper labeling of pumps and motors plays a big part here in alerting the consumer.
6. **Public notification.** Adequate public notification has not been forthcoming, to the extent that the consumer affected by Title 20 is aware of the financial impact it holds. Many consumers now feel the government is “putting one over on them”. Adequate public awareness will greatly assist the swimming pool industry in the endeavor to reduce energy consumption.
7. **Language.** In your difficult clarification process, please consider language that indicates the responsibilities of new construction, retrofit, and service repair. Each of these trades has a different set of requirements within the regulations of Title 20.
8. **Labeling.** If an integral swimming pool pump and motor is to be considered an “appliance,” there should be labeling to that fact as represented by an “efficiency rating” and the fact that regulated pumps and motors are suitable for use on filtration or water feature systems in California. This would alert the consumer and installer that the correct regulated pump/motor is being used, and the desired efficiency rating is being installed.

Thank you for this opportunity. IPSSA is always ready to assist in energy conservation and willing to participate in future rulemaking. As the largest pool and spa service organization in the world, we welcome your efforts in energy conservation and offer our assistance.

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