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We urge you to retain the current language pertaining to the pool pump motor replacement section of Docket 07-AAER-03-B, residential pool pumps (clarification).

In addition, please reconsider the requirement to replace timers with a two-function controller. This requirement is ill advised. Controllers should always be matched to the equipment they are controlling.

We have been in business for 20 years and are licensed C-61 D35 swimming pool service and repair contractors. We maintain and repair about 200 pools in Nevada and Placer Counties.

Responsible service companies and homeowners all over the state have worked together for many years with PG&E, Southern California Edison and San Diego Power to make their pool systems energy efficient. To include motor only replacements will unfairly burden consumers who have already worked hard to lower their electrical usage by downsizing their pool pumps and running their equipment for shorter cycles during off-peak hours. These conscientious consumers will never be able to reduce their electrical usage by anything close to the amounts estimated by PG&E. Many current and older pools require a high head pump to run multiple features such as solar, pool cleaners and waterfalls simultaneously. These previously very popular single pump systems, often touted as energy savers, will not function at low head/ low speed. These consumers will gain nothing by being forced to purchase a two or multi speed motor and controller. This is just one example of many retrofit challenges we find in the field. One size does not fit all.

There are also unintended consequences from expanding the current interpretation. If we are no longer permitted to replace single speed motors, it will eliminate a relatively low cost method of reducing energy consumption. That is the downsizing of pumps by replacing a motor and impellor with smaller horsepower components. It is a way for cash strapped homeowners who hire unlicensed service companies to downsize for about half the price of a new pump, and stay within the law. The cost of a simple motor replacement / downsize is currently below \$500 most of the time. Under the proposed change, the replacement cost of a two-speed motor and even a simple controller will be at least double that amount. In some cases the conversion to a two-speed motor will also require a new filter be installed, bringing the total cost to the consumer into the thousands of dollars. Under current law, \$500 is the threshold that triggers the requirement of a contractor's license. The additional paperwork and delays that formal contracts create will translate to even higher costs to consumers. All this for a previously simple repair or upgrade, often needed on very short notice.

This additional licensing requirement will also put a huge strain on the very small businesses that make up the bulk of the swimming pool service and repair industry in our state. Most are not currently required to hold a contractor's license, but depend on the "larger" small repairs such as motors for their livelihood.

If this seemingly simple clarification is approved, the CEC will completely alter the existing swimming pool service and repair industry in California.

Finally, there are thousands of qualified pool service companies in our state. Please allow these trained professionals to make the necessary field inspection of conditions and judge the most appropriate choice for a replacement motor and timer.

Thank you for your consideration,

Celia Hugueley & Debra Condict  
Owners