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DOCKET 07-AAER-3
DATE _____
RECD. MAY 27 2008

Dear Ms. Pfannenstiel and Mr. Rosenfeld,

Thank you for the opportunity to speak at the May 15th hearing regarding 2008 Rulemaking on Appliance Efficiency Regulations, Docket # 07-AAER-3B, residential swimming pool pump clarification.

Two issues arose at the hearing that I would like to address.

Firstly, I dispute the cost estimates for consumers as presented by the Davis Group. They appear to be quoting near wholesale prices for the replacement costs of the motors and controllers capable of controlling a two-speed motor. Homeowners would not have the opportunity to purchase these products directly from a wholesale distributor, but instead through a store or installer, who as with any other retailer, marks up the cost according to their overhead, etc. Suffice to say the real numbers would reflect significantly increased costs to the consumer, significantly slowing their very theoretical payback period.

Secondly, there is no doubt that neither PG&E, Davis Group or anyone else can create accurate figures as to the number of replacement filter pump motors sold in California. There is no tracking of replacement motor sales as to where they are to be installed. Even on pump sales there is no tracking at any level as to where a unit is to be installed. Most manufacturers, builders and wholesale distributors have become as efficient as possible with inventory and so the exact same single speed motor could be installed on many different pumps: a filter (either pool or spa, above ground, portable or in-ground), waterfall, vanishing edge, garden pond, sheer descent, spa jet, sweep booster pump or any other application that pumps water. Many general contractors as well as landscapers, plumbers and electricians also buy at our wholesale distributors, some of whom could be buying for water systems or irrigation in addition to pool or spa applications. Our wholesale distribution system is quite open to many trades and retailers. If PG&E and Davis Group based their energy savings figures on a number no one could even accurately guess at, it calls into serious question the savings figures they presented as a whole.

My last point restates the impossibility of enforcement of this motor inclusion. What of people who buy at retail stores and over the Internet from other states? Considering the mass confusion Title 20 now enjoys in our industry within California, even well meaning resellers will be inclined toward the more simple choice of ignorance.

Please do not create a situation that is so impossible to track or enforce, leaving conscientious installers at such a huge disadvantage.

Thank you sincerely for your thoughtful consideration of this matter,

Celia Hugueley