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08-AAER-1B

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December 2, 2008

Ms. Jackalyne Pfannenstiel
Chairman and Associate Member, Efficiency Committee

Mr. Arthur Rosenfeld
Commissioner and Presiding Member, Efficiency Committee

California Energy Commission
Buildings and Appliances Office
1516 Ninth Street, MS-25
Sacramento, CA 95814-5512

Subject: PG&E Comments on Title 20 15-Day Language for Residential Pool Pumps;
2008 Appliance Efficiency Rulemaking, Phase I, Part B
Docket Number 08-AAER-1B

Dear Ms. Pfannenstiel and Mr. Rosenfeld:

PG&E recommends that the CEC adopt the Residential Pool Pump requirements described in the current 15-day language (docket number 08-AAER-1B). PG&E appreciates the opportunity to offer comments on the 15-day language and understands the difficulties the Commission has had with the current revisions to the residential pool pump appliance standards considering the differing interpretations of the definition of pool pump capacity. There are two errors in the current language that we feel may need interpretation in order to be correctly enforced:

1. Section 1604(g)(3)(D)

...The following shall be tested and reported (i) for each curve for single-speed pumps or (ii) for each curve at both highest and **lowest** speeds for two-, multi-, or variable-speed pumps.

"Lowest speed" does not make sense for a variable-speed motor as most variable-speed motors can run at speeds lower than practicable for the application, resulting in test data that is not useful. This could be handled by an interpretation that "lowest" means the lowest *practical* speed.

2. Section 1606(4)(A)5.

- h. for residential pool pumps, each pool pump is marked permanently and legibly on an accessible and conspicuous place on the unit, in characters no less than ¼", with the nameplate HP of the pump and, if manufactured on or after January 1,

2010, with the statement, “This pump must be installed with a two-, multi-, or variable-speed pump motor controller.”;

This would require that **all** residential pool pumps be marked with the motor controller requirement statement when in fact, only two-, multi-, or variable-speed pumps should be so required, as is correctly stated in section 1607(d)(10)(C):

- (C) Two-, or multi-, or variable-speed residential pool pumps certified under Section 1606 of this Article on or after January 1, 2010 shall be marked, permanently and legibly on an accessible and conspicuous place on the unit, in characters no less than ¼", “This pump must be installed with a two-, multi-, or variable-speed pump motor controller.”.

This could be handled by an interpretation that 1607(d)(10)(C) takes precedence.

We look forward to working with the Commission on implementing the remaining changes outlined in our proposal information template for residential pool pump measure revisions document during the next rulemaking.

Sincerely,

Patrick Eilert
Program Manager, Codes and Standards
Pacific Gas & Electric Company