UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



OFFICE OF AIR AND RADIATION

August 30, 2012

Dear Residential Pool Pump Manufacturer or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) and U.S. Department of Energy (DOE) welcome your input on the attached Draft 1 Version 1.0 ENERGY STAR Pool Pump specification and Draft 2 Test Method (Rev-Aug 2012). EPA is also including the Connected Functionality Discussion Document which outlines our initial thoughts on how best to address and encourage smart grid connected functionality in pool pumps. Stakeholders are encouraged to submit comments on these documents no later than **September 25, 2012**. EPA and DOE will hold an ENERGY STAR stakeholder webinar on September 28, 2012 to discuss these documents and answer stakeholder questions. Details on this meeting are provided below.

Last Fall, EPA and DOE released a Framework Document and Draft 1 Test Method (Rev Nov-2011) for stakeholder review and comment. A stakeholder webinar was held to discuss these documents in greater detail. EPA and DOE received several written comments on the Framework Document and Draft 1 Test Method. These documents are posted on the ENERGY STAR Pool Pump Specification Development webpage at www.energystar.gov/newspecs.

Key Elements of Draft 1 Specification Proposal

This first draft is informed by formal comments from stakeholders in response to the Framework Document, web meeting, as well as subsequent discussions with individual stakeholders. Questions and important discussion topics are highlighted in note boxes located throughout the draft specification. EPA has written a Draft 1 specification with the following key elements:

- Definitions Largely based on APSP-15, with modifications to provide further clarification, as needed.
- **Scope Covered Products**: Residential Inground Pool Pumps, that are single-, multi-, or variable speed, sized at > 0.5 and ≤ 4 Total HP. The inclusion of size criteria is intended to limit scope to residential applications and exclude small single speed pumps.
- Scope Excluded Products: Residential Aboveground Pool Pumps, Residential Auxiliary Pool Pumps, Spa Pumps, Residential Inground Pool Pumps having a total horse power of ≤ 0.5 HP and > 4 HP, and two- or multi-speed pumps with manual speed controls which are not ready for connection to an external speed controller.
- **Performance Levels** Pool pumps would be required to meet an Energy Factor of 3.8 or higher using Pool Performance Curve A (at Low Speed if multi-speed or variable-speed).

Key Elements of Draft 2 Test Method

DOE has written a Draft 2 Test Method (Rev Aug-2012) that incorporates stakeholder feedback on the Draft 1 Test Method as follows:

- Modified variable speed pump testing speeds to those specified in APSP-15 (maximum, minimum, and most efficient).
- Included Standby Mode testing.
- Set testing speeds to discrete increments starting from 0 GPM, rather than a set percentage increment of full flow.

Connected Functionality Discussion Document

Consistent with our principle of enhanced consumer value, EPA is interested in highlighting products having connected functionality features on the ENERGY STAR Qualified Product List (QPL), so that consumers, rebate program administrators and other interested stakeholders are better able to identify and advance those products into the market. The ENERGY STAR Pool Pumps Connected Functionality Discussion Document is intended to engage stakeholders in the further development of criteria related to connected functionality in parallel with the Version 1.0 specification development effort. While independent of the specification development process, once the criteria are finalized, EPA intends to incorporate it into the specification and recognize products on the Qualified Product List.

Test Data

EPA has so far relied on the California Energy Commission (CEC) data set on multi-speed and variable speed pumps to develop performance levels for products covered under this specification. EPA does wish to enhance this data set, in particular with data on the efficiency and features associated with Single Speed and Aboveground Pumps. EPA welcomes test data, preferably using the ENERGY STAR Draft 2 Test Method, by **September 25, 2012** and has provided a <u>datasheet</u> which can be submitted to EPA at poolpumps@energystar.gov.

Consumer Education

EPA is interested in providing consumers key information on best practices for maximizing performance and energy efficiency when operating the pump in the field. The intent is to make this information available on the ENERGY STAR website and through other marketing and educational materials branded with the ENERGY STAR mark.

EPA invites stakeholders to help identify the industry's best literature, standards, and educational guides to assist in this educational content development effort. Please submit ideas and content suggestions to poolpumps@energystar.gov.

ENERGY STAR Stakeholder Webinar and In Person Meeting

EPA and DOE invite stakeholders to participate in a web meeting to discuss the Draft 1 Specification, Draft 2 Test Method, and Connected Functionality Discussion Document on **September 28, 2012 at 12PM, EDT**. Stakeholders interested in participating in the webinar should RSVP to poolpumps@energystar.gov by September 25, 2012.

EPA and DOE will also be hosting an in person stakeholder meeting in conjunction with the Int'l Pool | Spa | Patio Expo in New Orleans, LA on **November 6, 2012 at 2:00 PM CST**. Stakeholders interested in participating in this meeting should RSVP to poolpumps@energystar.gov by October 29, 2012.

Comment Submittal

Stakeholders are encouraged to submit comments to poolpumps@energystar.gov no later than September 25, 2012 on the Draft 1 specification, Connected Functionality Discussion Document, and Draft 2 Test Method. As EPA and DOE move forward with developing these new requirements, the intention is to distribute additional drafts of the specification and test method for stakeholder review and comment. All written comments received by EPA will be posted to the pool pumps specification development webpage unless submitter requests otherwise.

The exchange of ideas and information between EPA, DOE, industry, and other interested parties is critical to the success of ENERGY STAR. Your input is very valuable during this specification development process. All EPA correspondence and specification documents will be posted throughout the specification development process to the ENERGY STAR Pool Pump Specification Development webpage at www.energystar.gov/newspecs.

Please feel free to contact me at (202) 343-9046 and kent.christopher@epa.gov or Erica Porras, ICF International, at (202) 862-2972 and erica.porras@icfi.com with any questions or comment on the Draft 1 specification or the Connected Functionality document. For questions relating to the test method, please contact Bryan Berringer at (202) 586-0371 or Bryan.Berringer@ee.doe.gov

Thank you for your continued support of ENERGY STAR. I look forward to working with you during the specification revision process.

Sincerely,

Christopher Kent,

Product Manager for ENERGY STAR Pool Pumps

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