



January 18, 2018

Sharon Frey
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: ENERGY STAR® Pool Pumps Version 2 and Version 3 Draft 2 Specification

Dear Ms. Frey:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), Southern California Gas Company (SoCalGas®), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE) in response to the ENERGY STAR Pool Pumps Version 2 and Version 3 Draft 2 Specification released on December 19, 2017.

The signatories of this letter, collectively referred to herein as the California Investor Owned Utilities (CA IOUs), represent some of the largest utility companies in the Western United States, serving over 35 million customers. As energy companies, we understand the potential of the ENERGY STAR program to cut costs and reduce consumption while maintaining or increasing consumer utility of the products. We have a responsibility to our customers to advocate for sensible test procedures, specifications, and voluntary certifications that accurately reflect the climate and conditions of our respective service areas to maximize the positive effects of these efforts.

We appreciate this opportunity to provide the following comments about this Draft Specification on pool pumps. The CA IOUs have been involved with pool energy efficiency for over 15 years. During that time, we have developed and implemented various pool efficiency rebate programs, and in 2004, proposed and supported the adoption of the first in the nation, appliance standards for pool pump motors in California. These standards included a test and list requirement for pool pumps to enable the reporting of Energy Factor, a metric developed by the CA IOUs that is now used by the ENERGY STAR program. In 2008, we were also successful in advocating for building code language that required energy efficient equipment, plumbing, and design on all newly constructed pools in California. Some, or all of these standards have been adopted in Arizona, Washington, Florida, and Connecticut. Given our extensive experience with this product category, and the large number of pools in California, we have a vested interest in ensuring effective successful ENERGY STAR specifications are developed nationally.

In September of 2015, the Department of Energy (DOE) initiated a formal working group to negotiate standards for dedicated-purpose pool pumps (DPPPs). The CA IOUs participated as members of the working group, which led to a final term sheet of test procedure and standards recommendations to DOE on July 29, 2016. Subsequently, DOE published a Direct Final Rule on January 18, 2017. These new DPPP standards apply to self-priming pool pumps, non-self-priming pool pumps, pressure cleaner booster pumps, and integral pool pumps; and will take effect nationally on July 19, 2021.

We believe that an updated voluntary ENERGY STAR specification is an integral part of facilitating widespread energy efficiency. We encourage the United States Environmental Protection Agency (EPA)

to continue developing an ENERGY STAR specification that differentiates the most efficient products while delivering reliable performance, and conveying information to consumers about the product that is accurate and representative. The requirements arising from the specification are helpful for consumers seeking the most efficient products, and the utility-sponsored programs that leverage the ENERGY STAR distinction to identify and incentivize efficient products.

We strongly support the ENERGY STAR Pool Pumps Version 2 and Version 3 Draft 2 Specification and commend EPA for addressing CA IOU comments made on the Draft 1 Specification. This includes adding freeze protection requirements and aligning the Version 2 energy efficiency levels with the DOE standard level for large self-priming pumps. In support of EPA's continued revision efforts, we offer the following comments for consideration on the Draft 2 Specification.

- 1. The CA IOUs recommend EPA remove integral filter pumps from the scope of the Draft 2 ENERGY STAR specification, as these products are unable to achieve a Weighted Energy Factor (WEF) rating, and do not currently have an appropriate above-code energy saving technology option.**

The CA IOUs recommend EPA modify the scope to remove reference to timers for integral filter pumps in Section 3.1.D. The language in this section mirrors the DOE prescriptive requirement for these products, which takes effect in 2021. We believe it was EPA's intention to include this language, such that any pool pump which receives a WEF rating, and is *also* of the integral design, should have a timer with a maximum 10-hour timeout. However, integral filter pumps are a separate equipment class in the DOE framework and cannot be tested to receive a WEF rating. The pump sub-types that can receive WEF ratings (self-priming pool pumps, non-self-priming pool pumps and pressure cleaner booster pumps) are not designed for timers with maximum 10-hour timeout timers. Therefore, the language below in Figure 1 is not relevant to pool pump sub-types with WEF ratings, and should be removed.

272	D) Timers for Integral Filter Pumps: All Integral Sand Filter Pool Pumps and Integral Cartridge Filter
273	Pool Pumps shall be distributed in commerce with a timer with maximum 10 hour timeout, which
274	is either integral to the pump or a separate component shipped with the pump.

Figure 1: Language suggested to be removed from the scope of the draft specification

Finally, while the CA IOUs do support more efficient integral filter pumps, at this time we do not believe there is a reasonable and cost-effective technology option beyond the federal integral timer requirement set to take effect in 2021.

- 2. The CA IOUs commend EPA for setting two versions of pool pump efficiency levels within this Draft 2 Specification, but encourage EPA to consider revisiting Version 3 energy efficiency levels, if necessary, once sufficient test data has been submitted to the ENERGY STAR certified product database.**

The CA IOUs support DOE's inclusion of the Version 3 energy efficiency levels within the Draft 2 Specification. Setting energy efficiency levels for Version 2 (effective in 2018 or 2019) and more stringent energy efficiency levels (for certain pump sub-types) for Version 3 (effective in 2021) simultaneously sends a long term, strong market signal to manufacturers to continue developing energy efficient products. We believe this will lead to increased innovation and energy savings. However, we do realize that the data which has been used to set these energy efficiency levels is mostly modeled, as there is currently no publicly available tested WEF data. This is especially true for pressure cleaner booster pumps, which have never been subject to any previous test procedures, energy efficiency standards or voluntary energy efficiency levels. We encourage EPA to consider revisiting the Version 3 energy

efficiency levels once sufficient data has been collected in the ENERGY STAR certified product database after the Version 2 energy efficiency levels take effect.

3. The CA IOUs support EPA’s continued inclusion of replacement pool pump motors in the Draft 2 Specification.

The CA IOUs commend EPA for continuing to include replacement pool pump motors in the scope of the ENERGY STAR Draft 2 Specification. When a pool pump fails, the point of failure is often associated with the motor as compared to the pump head. When this occurs some pool service professionals will replace the entire pump, while others will do a “motor only” replacement. There are many factors which impact whether a pool service professional will perform an entire pump or “motor only” replacement, including cost, existing plumbing configuration, and the pool service professional’s technical aptitude. To date, only self-priming pool pumps have benefited from the ENERGY STAR program, which in many cases has led pool service professionals to perform entire pool pump replacements due the availability of rebates dependent on the ENERGY STAR label. An equivalent ENERGY STAR certification for replacement pool pump motors will help level the playing field and expand energy savings across the country.

We do realize there is no established metric, test procedure, or national efficiency standard for replacement pool pump motors; however, the CA IOUs, efficiency advocates, and manufacturers are actively working to address this opportunity. We support EPA creating a placeholder within the ENERGY STAR Version 2 and Version 3 Draft 2 Specification and look forward to making a recommendation to EPA on replacement pool pump motors for eventual inclusion in the ENERGY STAR program.

In conclusion, we wish to reiterate our support to EPA for revising the ENERGY STAR Pool Pump Specification, and we encourage EPA to carefully consider our comments.

Sincerely,



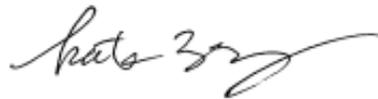
Patrick Eilert
Manager, Codes & Standards
Pacific Gas and Electric Company



Darren Hanway
Energy Efficiency Program Operations Manager
Southern California Gas Company



Michelle Thomas
Manager, Energy Codes & Standards and ZNE
Engineering Services
Southern California Edison



Kate Zeng
ETP/C&S/ZNE Manager
Customer Programs
San Diego Gas & Electric Company