

January 31, 2018

Abigail Daken
US Environmental Protection Agency
Ariel Rios Building 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Daken:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the ENERGY STAR® Pool Pump Specification Versions 2.0 and 3.0 Draft 2, released by the Environmental Protection Agency (EPA) on December 19, 2017.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR® Program. CEE members are responsible for ratepayer-funded efficiency programs in 46 US states, the District of Columbia, and seven Canadian provinces. In 2015, CEE members directed over \$7 billion of the \$8.7 billion in energy efficiency and demand response program expenditures in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR, so it may continue to serve as the national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

CEE Thanks EPA for Addressing Concerns CEE Raised in the Draft 1 Proposal

CEE thanks EPA for addressing many of CEE comments from the Draft 1 proposal. In particular, we are pleased to see that EPA opted to use the DOE methodology and dataset when setting the efficiency criteria, shared plans to continue to engage industry to ensure that the products meeting the Version 3.0 criteria will be available in 2021 or earlier to consumers, and retained the reporting requirements for plumbing curves A and B.

Additional Manufacturer Input Would Provide CEE Greater Confidence in the Proposal

Upon reviewing the comments posted to the ENERGY STAR specification development page, CEE observed very little feedback from pool pump manufacturers. There are several elements of the specification proposal in which CEE lacks the necessary technical expertise to provide comments and we rely on the review and input of manufacturers to ensure the requirements are sound. For example, in the connected criteria where EPA is proposing to move from RPM to flow rate, it is our understanding that flow is not typically used as feedback to the motors and most pumps are controlling RPM only. We highly encourage EPA to test this with manufacturers to ensure that all pumps have the ability to detect and regulate flow. Beyond this specific example, after reviewing the Draft 2 proposal, we think obtaining additional manufacturer input on the connected criteria is important.

CEE Continues to Seek Data Transparency, Disclosure of Necessary Assumptions, and Sharing All Analysis at the Onset of Proposed Program Changes

The data and analysis shared with stakeholders related to ENERGY STAR pool pump specification proposal has prompted CEE to underscore comments submitted to EPA on January 24, 2018 in response to ENERGY STAR standard operating procedures, provided below.

To satisfy ideal transparency considerations, statements and accompanying data and analysis would clearly demonstrate the range and performance values for the measure at hand, and the level that represents the top 25 percent market share would be identified. Representations as to the amount of energy savings that are expected over typical use and time frames would be provided, as well as incremental cost and availability assumptions disclosed.

We recognize that in some product categories, perfect data to assess compliance with these tenets is not available. In these cases, we recommend that EPA share assumptions or logic used to establish the basis for the proposed action.

By equipping efficiency program administrators and other ENERGY STAR Partners to conduct their assessments of whether the proposed performance levels will enable cost-effective offerings, consumer value, and yield regulatory support, every proposal would at least include:

- *Full masked dataset used by the agency to develop the proposal*
- *Market sales and penetration data or the data EPA is using as a proxy, such as shipment data by product type*
- *Per unit and percent energy savings of proposed performance levels for all product categories, including transparency to how these energy savings values are calculated*
- *Number and percent of models, brands, or unique model groups “available” that would meet the proposed performance criteria for each product type*
- *Cost-effectiveness analysis and incremental retail price of the base unit relative to the ENERGY STAR unit*

CEE would once again like to thank the EPA for the opportunity to comment on versions 2.0 and 3.0 of the ENERGY STAR Pool Pump criteria. Please contact CEE Senior Program Manager Eileen Eaton at (617) 337-9263 with any questions about these comments.

Sincerely,



Eileen Eaton
Senior Program Manager