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Sharon Frey
USEPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
Mail Code: 4305T
Washington, DC 20460
PoolPumps@energystar.gov

Comments on Draft 1, V2.0 and dV3.0 EnergyStar Pool Pump Program Requirements

Hayward Pool Products, a division of Hayward Industries Inc., supports the EPA in its initiative to align the EnergyStar program efficiency reporting method with the recent Department of Energy DPPP rulemaking. The resources required to comply with the DOE DPPP rulemaking requires a substantial commitment in resources from manufacturers therefore all opportunities to harmonize these two programs should be considered.

To this point, Hayward respectfully submits the following questions and comments regarding the Draft 1 Versions 2.0 and 3.0 proposals.

1. In accordance with the current EPA Energy Star Partner Commitments, pool pump certification must be obtained from a Certification Body recognized by the EPA for pool pumps prior to associating the EnergyStar name or mark with any product. EPA has stated that it hopes to finalize Ver. 2.0 and 3.0 in December 2017 and that once finalized, products may be certified to the 2.0 version immediately. Preliminary discussions with at least once Certification Body suggest that the ability to certify pool pumps in accordance with the proposed Department of Energy WEF metric may not be available in time to coincide with EPA's target dates. The number of pool pumps that will be subject to recertification using the Draft 1 Test Method is significant and there is concern that manufacturers will not have any options for certifying products to the new Version 2.0, Draft 1 method by EPA's targeted dates. Given the significance of an EnergyStar rating to manufacturers, utilities, and consumers, can EPA provide any comment with regards to the preparedness of the Certification Bodies who currently participate in the pool pump category to be able to certify pool pumps, for both testing and reporting, using the new WEF metric?
2. Currently EnergyStar pool pump Partners are subject to annual third-party verification testing by a Certification Body recognized by the EPA for pool pumps. Although this testing is conducted on only a percentage of models in each product category, given the relatively small size of the pool pump industry, the likelihood that at a particular manufacturer's products will be selected each year is high. Currently, verification testing involves the purchase of one sample of each model selected, from a retail outlet, at retail price. These pumps are then tested and reported in accordance with the standard. The cost of this testing, including charge-back to the manufacturer for the purchase price of the pump is substantial, ranging from \$2500 to as high as \$4000 or more per test. History shows that a manufacturer can anticipate from 2 to 4 pumps being selected and tested in any particular year.

Since manufacturers will already to be required to report the actual WEF under DOE's DPPP rulemaking and subsequently subject to the DOE DPPP enforcement requirements, does the EPA intend to continue with verifying ongoing product qualification for the proposed new requirements, in addition to DOE DPPP enforcement? If so, does the EPA intend to adopt the DOE DPPP enforcement requirements and apply them to the Energy Star program or establish separate requirements for verifying ongoing product qualifications? Due to the potential substantial increased costs associated with the DOE DPPP enforcement requirements (a minimum of 4 samples of each model would be required), Hayward does not recommended that the EPA adopt the DOE DPPP enforcement requirements for the Energy Star Program. Hayward does, however, request that the EPA share their intent on how ongoing product qualification will be addressed with the proposed new requirements.

3. Section 5.1 of the Energy Star V2V3 Draft 1 specifies that one (1) test sample should be tested, however, Section 5.2 references the DOE DPPP Test Procedure, which requires a minimum of two (2) test samples per model. Does the EPA intend to require a minimum of (2) test samples per model in alignment with the DOE DPPP Test Procedure or permit testing of a single sample to be used for the required test data?
4. There are inconsistencies between the proposed EnergyStar Draft 1 V2.0 and V3.0 document and the DPE DPPP Test Procedure. The Draft 1 scope shows ≤ 2.5 hhp, while the DOE DPPP Procedure specifies <2.5 hhp. Is it EPA's intent to include pumps of 2.5 hhp or to exclude them as in the DOE program.
5. Since the proposed requirements in the Energy Star V2V3 Draft 1 are significantly different from the existing Energy Star V1.1 requirements, does the EPA intend to create a separate database of pool pumps complying with the proposed V2V3 requirements? Since different performance parameters would be tested and reported for the proposed V2V3 requirements, it does not seem that the current V1.1 EPA database would be suitable.

Hayward is very thankful to the Environmental Protection Agency for the opportunity to provide input and comment on these important changes to the EnergyStar program for pool pumps. As a leading equipment manufacturer, representing thousands of employees and, in turn, thousands more pool professionals and their customers, we look forward to working with EPA on the development of this important next step for the pool pump EnergyStar program.

Sincerely,



John O'Hare
Sr. Manager-Product Compliance
Hayward Industries, Inc.