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P. 5 - Eligible Product Categories

According to the document "EPA is initially interested in focusing on the residential inground swimming pool pump market". Hydro-Quebec highly recommends that **aboveground** swimming pool pumps do not be excluded from the initial process. The technical issues to be considered for these two segments are the same. Also, we have to consider that in some Eastern regions in North America aboveground pools are more popular than inground pools. For example here in Quebec, we have 370,000 aboveground pools (75%) versus 120000 inground pools (25%).

P.8, Point 9 - Advantages /disadvantages using Energy Factor

There is a major benefit to use the Energy Factor because it gives the energy usage for the final objective: moving a quantity of water (gpm) under standardizes conditions. It takes every aspect of the pump in consideration (impeller design, motor efficiency...).

In addition, it would be a good approach to group pumps per flow range (at maximum speed for 2 or variable speed). The main reason is the fact that pumps hp's are not necessarily a good indication of the nominal flow. Here is an example:

A table for each Curve (A, B and C) and for single, double and variable speed

Ex.:

Single Speed Curve B				
Flow Range (GPM)	Manufacturer	Pump model*	Flow (gpm)	EF (gpm/wh)*
...	...	...	...	...
30 -40	A	5465436	36.4	0.122
	B	645654	32.5	0.119
	C	Y4566	37,3	0.106
	...	...	...	...
40-50	A	45646	46.4	0.107
	D	64656	42.5	0.101
	E	6rd43	47,3	0.094
	...	...	...	...
...	...	...	...	...

\* In each flow range, model should be listed starting from the one with the best EF.

For 2 speeds or variable speed, additional column would be required to give flow and EF at lower speed.

P.9 Point 13 - Curves A, B, C.

In our region most existing pool installations have characteristics that are more similar to **curve B** than curve A. It is therefore imperative to have testing for curve B as well as curve A.