

Appliance Standards Awareness Project  
American Council for an Energy-Efficient Economy  
Natural Resources Defense Council

July 30, 2021

Mr. Jeremy Dommu  
U.S. Department of Energy  
Office of Energy Efficiency and Renewable Energy  
Building Technologies Office, EE-5B  
1000 Independence Avenue SW  
Washington, DC 20585

**RE: Docket Number EERE–2020–BT–TP–0032: Request for Information for Test Procedures and Energy Conservation Standards for Circulator Pumps and Small Vertical In-Line Pumps**

Dear Mr. Dommu:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), and Natural Resources Defense Council (NRDC) on the request for information (RFI) for test procedures and energy conservation standards for circulator pumps and small vertical in-line pumps. 86 Fed. Reg. 24516 (May 7, 2021). We appreciate the opportunity to provide input to the Department.

**We urge DOE to move quickly to adopt test procedures and energy conservation standards for circulator pumps and small vertical in-line pumps based on the ASRAC working group term sheets.** As DOE describes in the RFI, an Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC) working group approved two term sheets in September 2016 and December 2016 with consensus recommendations regarding scope, metric, test procedures, energy conservation standards, and labeling and certification requirements for circulator pumps.<sup>1</sup> The September 2016 term sheet also included a recommendation that DOE establish standards for small vertical inline (SVIL) pumps that are comparable to the standards for commercial and industrial inline pumps.<sup>2</sup> After many years of inaction on the recommendations of the ASRAC working group, we are pleased that DOE is initiating this process and we urge the Department to move quickly to adopt test procedures and standards for circulator pumps and SVIL pumps based on the term sheets.

**We support the adoption of HI 41.5-2021 for circulator pumps.** In 2018, the Hydraulic Institute (HI) adopted a program guideline, HI 41.5-2018, to support HI's energy rating program for circulator pumps. The program guideline noted that the specified method for testing circulator pumps was consistent with the ASRAC working group term sheets.<sup>3</sup> However, we understand that as manufacturers began to test circulator pumps to the test procedure in 41.5-2018, they found that many existing pressure control curves include points below the reference curve. (The September 2016 term sheet specifies that all test points must be at or above the reference curve.) An update to the program guideline, HI 41.5-2021, includes a modification to correct for test data below the reference curve. We understand that this

---

<sup>1</sup> 86 Fed. Reg. 24519.

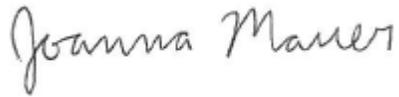
<sup>2</sup> <https://www.regulations.gov/document/EERE-2016-BT-STD-0004-0058>. Recommendation #1B.

<sup>3</sup> HI 41.5-2018. Section 41.5.1.1.

change improves representativeness for many circulator pump models and is consistent with the intent of the term sheets. We also understand that HI 41.5-2021 includes additional minor modifications to improve accuracy and clarity.

Thank you for considering these comments.

Sincerely,



Joanna Mauer  
Technical Advocacy Manager  
Appliance Standards Awareness Project



Christopher Perry, PE  
Manager of Codes and Standards  
American Council for an Energy-Efficient  
Economy



David Goldstein  
Energy Co-Director, Climate and Clean Energy Program  
Natural Resources Defense Council