

Appliance Standards Awareness Project
Natural Resources Defense Council

September 1, 2017

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket No. 15-AAER-02: Pool Pumps and Motors

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and Natural Resources Defense Council (NRDC) on the California Energy Commission's (CEC's) Draft Staff Report for replacement pool pump motors. We appreciate the opportunity to provide comments to the Commission.

ASAP is a coalition that includes representatives of efficiency, consumer and environmental groups, utility companies, state government agencies, and others. Working together, the ASAP coalition seeks to advance cost-effective efficiency standards at the national and state levels through technical and policy advocacy and through outreach and education.

NRDC is an international nonprofit environmental organization with more than 1.3 million members and online activists. Since 1970, NRDC's lawyers, scientists, and other environmental specialists have worked to protect the world's natural resources, public health, and the environment. NRDC's top institutional priorities are curbing global warming and creating a clean energy future. Energy efficiency is one of the quickest, cleanest, cheapest solutions to global warming and other energy-related problems. Cost-effective energy efficiency standards help to ensure that consumer and commercial products provide the same level of comfort and service using less energy, with benefits for consumers, the environment and the electricity grid.

Efficiency standards for replacement pool pump motors are important in order to protect the energy savings from the DOE standards for pool pumps, and they offer significant potential savings for California. Earlier this year, DOE finalized the first national efficiency standards for pool pumps. The standards effectively require variable-speed motors for pumps used in in-ground pools. However, the DOE standards do not address replacement pool pump motors. We and other stakeholders, including pool pump manufacturers, share the concern that absent standards for replacement motors, consumers could choose to buy a replacement single-speed motor instead of buying a new variable-speed pump. This would impact both pool pump manufacturers, by potentially reducing sales of new pool pumps, as well as energy savings.

Standards for replacement pool pump motors would help protect the very large savings from the DOE standards for pool pumps. DOE estimates that on a national level, the pool pump standards will save 3.8 quads of energy over 30 years of sales.¹ To put this in perspective, these savings are equivalent to about 4% of total US annual energy use. Complementary standards for replacement

¹ <https://www.regulations.gov/document?D=EERE-2015-BT-STD-0008-0109>.

motors will help ensure that these very large savings from the DOE pool pump standards are actually achieved.

Standards for replacement pool pump motors offer large potential energy and economic savings for California. CEC Staff estimate that the proposed standards in the Draft Staff Report, after stock turnover, would save 657 GWh per year, which translates to \$122 million in bill savings for California consumers.

We appreciate the Commission's efforts to establish standards for replacement pool pump motors.

Sincerely,



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