

Appliance Standards Awareness Project
Consumer Federation of America
Florida Consumer Action Network

November 19, 2020

Mr. Jeremy Dommu
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-2J
1000 Independence Avenue SW
Washington, DC 20585

RE: Docket Number EERE-2017-BT-STD-0048/RIN 1904-AE38: Notice of Proposed Rulemaking for Test Procedure and Labeling Requirements for Dedicated-Purpose Pool Pump Motors

Dear Mr. Dommu:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), Consumer Federation of America (CFA), and Florida Consumer Action Network (FCAN) on the notice of proposed rulemaking (NOPR) for test procedure and labeling requirements for dedicated-purpose pool pump (DPPP) motors. 85 Fed. Reg. 62816 (October 5, 2020). We appreciate the opportunity to provide input to the Department.

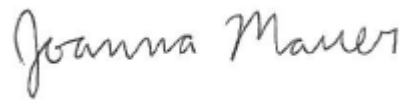
We strongly urge DOE to require the UL 1004-10 label on pool pump motors. As described in the August 2018 Joint Petition,¹ the DPPP standards—which will take effect on July 19, 2021—do not address replacement motors. This presents a significant loophole that seriously threatens both the consumer savings from the standards and the investments that manufacturers are making to comply with the standards. A recently published UL standard—UL 1004-10:2020—includes requirements for pool pump motors that align with the DPPP standards. Requiring the UL label on pool pump motors would thus ensure that when a consumer replaces a motor on a pump that meets the DPPP standards, the new motor will continue to provide the same energy savings. However, the NOPR would instead make certification to the UL standard voluntary.² If certification to the UL standard is voluntary, in essence DOE will have taken no constructive action to close the replacement motor loophole, and consumers will continue to be sold inefficient, wasteful products unnecessarily. Therefore, we strongly urge DOE to require the UL 1004-10 label on pool pump motors.

Thank you for considering these comments.

Sincerely,

¹ <https://www.regulations.gov/document?D=EERE-2017-BT-STD-0048-0014>.

² 85 Fed. Reg. 62820. We note that in the draft NOPR submitted to the Office of Information and Regulatory Affairs (OIRA) (<https://www.regulations.gov/document?D=EERE-2017-BT-STD-0048-0052>), certification to the UL standard was mandatory.



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