

Appliance Standards Awareness Project
Natural Resources Defense Council
Northwest Energy Efficiency Alliance
Northwest Power and Conservation Council

June 1, 2015

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program
Mailstop EE-5B
1000 Independence Avenue, SW
Washington, DC 20585

RE: Docket Number EERE–2011–BT–STD– 0031/RIN 1904–AC54: Notice of Proposed Rulemaking for Energy Conservation Standards for Pumps

Dear Ms. Edwards:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), Natural Resources Defense Council (NRDC), Northwest Energy Efficiency Alliance (NEEA), and Northwest Power and Conservation Council (NPCC) on the notice of proposed rulemaking (NOPR) for energy conservation standards for pumps. 80 Fed. Reg. 17826 (April 2, 2015). We appreciate the opportunity to provide input to the Department.

We support the proposed standards for pumps. The proposed standards reflect the consensus of the ASRAC working group which negotiated standards for pumps and in which all of our organizations participated. The proposed standards would save 0.28 quads of energy over 30 years of sales and yield net savings of \$0.4-1.1 billion for pump purchasers.¹

We support the proposed labeling and certification requirements. The proposed labeling and certification requirements also reflect the consensus of the ASRAC working group. As DOE notes in the NOPR, requiring labels may increase demand for more-efficient pumps and will make it easier for consumers to compare the expected performance of a bare pump to that of a pump with controls.² Labels will also help facilitate utility programs by providing a mechanism for verifying the installation of a given pump. The proposed certification requirements will also help facilitate utility programs by providing publicly-available certified data on pump performance. In particular, the proposed requirement to certify driver power input at each required load point will help facilitate utility programs by providing the ability to estimate potential energy savings for different load profiles.

We encourage DOE to set up the certification database for pumps as soon as possible so that manufacturers have the option of certifying early. As noted above, publicly-available certification data will facilitate utility programs to incentivize high-efficiency pumps. Rather

¹ 80 Fed. Reg. 17829.

² 80 Fed. Reg. 17882.

than waiting until close to the compliance date—which will be four years after publication of the final rule—to set up the certification database, we encourage DOE to get the certification database up and running as soon as possible so that manufacturers can voluntarily certify early. Very large energy savings are possible in many applications with pumps that include speed control, and voluntary early certification data will allow utility programs to begin to capture these savings in advance of the compliance date of the standards.

Thank you for considering these comments.

Sincerely,



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