

**Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
Northwest Energy Efficiency Alliance**

June 29, 2020

Mr. Jeremy Domm
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-5B
1000 Independence Avenue SW
Washington, DC 20585-0121

RE: Energy Conservation Standards for Small Electric Motors; Notification of proposed determination and request for comment (Docket number EERE-2019-BT-STD-0008)

Dear Mr. Domm:

This letter provides comment from the Appliance Standards Awareness Project, American Council for an Energy-Efficient Economy and Northwest Energy Efficiency Alliances on the proposed determination concerning small electric motors. 85 Federal Register 24146 (April 30, 2020).

DOE initiated its most recent review of small motor test procedures in 2017 with a Request for Information (RFI). The RFI stated, “DOE may consider setting test procedures for motors that are considered “small” by customers and the electric motor industry but are not currently subject to the small electric motor test procedures.” DOE continued, “These motors may have similarities to motors that are currently regulated as small electric motors (such as horsepower) and may be used in similar applications.” We strongly supported DOE’s investigation of scope expansion.¹ Two years later, in the motors test procedure proposed rule² and the small motors energy conservation standards RFI³ DOE reversed course and completely ignored scope expansion.

DOE is making a serious mistake by failing to evaluate the potential benefits of expanding its small motors regulations to additional motors. As we have described in previous comments and as DOE acknowledged in 2017, there are types of motors that are considered “small” in the market that compete with regulated motors. Separately, in our comments responding to DOE’s electric motors energy conservation standards RFI,⁴ we have urged DOE to consider scope expansion, including various

¹ See joint comment letter filed at <https://www.regulations.gov/document?D=EERE-2017-BT-TP-0047-0027>

² 84 Fed. Reg. 17004

³ 84 Fed. Reg. 14027

⁴ 85 Fed. Reg. 30878

types of motors considered “small” by the market.⁵ Given DOE’s mandate to carry out the energy conservation purposes of the Energy Policy and Conservation Act, DOE must consider expanding the scope of its motor standards, either in this docket or the electric motors docket.

Thank you for considering these comments.

Sincerely,



Andrew deLaski
Executive Director
Appliance Standards Awareness Project



R. Neal Elliott
Senior Director for Research
American Council for an Energy-Efficient
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Louis Starr, P.E.
Sr. Energy Codes and Standards Engineer
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⁵ See joint comment letter filed at <https://beta.regulations.gov/document/EERE-2020-BT-STD-0007-0009>