

Appliance Standards Awareness Project  
Natural Resources Defense Council

November 21, 2016

Ms. Ashley Armstrong  
Appliance and Equipment Standards Program  
U.S. Department of Energy  
Building Technologies Office  
Mailstop EE-5B.  
1000 Independence Ave. SW  
Washington, DC 20585

**RE: Docket Number EERE–2016–BT–TP–0002/RIN 1904–AD66: Notice of Proposed Rulemaking for Test Procedures for Dedicated-Purpose Pool Pumps**

Dear Ms. Armstrong:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and Natural Resources Defense Council (NRDC) on the notice of proposed rulemaking (NOPR) for test procedures for dedicated-purpose pool pumps. 81 Fed. Reg. 64580 (September 20, 2016). We appreciate the opportunity to provide input to the Department.

**We support the proposed definitions and test procedures for dedicated-purpose pool pumps (DPPPs).** In the NOPR, DOE proposes definitions and test procedures for DPPPs. We support these definitions and test procedures, which reflect the recommendations of the ASRAC working group for DPPPs. However, we also encourage DOE to attempt to ensure that the definition for “designed and marketed,” which would help define pressure cleaner booster pumps, does not contain any potential loopholes. The proposed definition for “designed and marketed” is as follows:

*Designed and marketed* means that the equipment is specifically designed to fulfill the indicated application and, when distributed in commerce, is designated and marketed for that application, with the designation on the packaging and all publicly available documents (e.g., product literature, catalogs, and packaging labels).<sup>1</sup>

We believe that the definition for “designed and marketed” in the proposed CFR language and noted above is a significant improvement over the definition contained in the preamble text in terms of ensuring that products that are designed and marketed for both pressure cleaner booster pump applications as well as other applications meet the definition of “pressure cleaner booster pump.”<sup>2</sup> However, we encourage DOE to consider whether removing the word “specifically” may further reduce the possibility for any potential loopholes. We also encourage DOE to consider removing the word “all” from “all publicly available documents” such that if the

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<sup>1</sup> 81 Fed. Reg. 64647.

<sup>2</sup> 81 Fed. Reg. 64592.

designation is on some publicly available documents but not others, the pump would still be considered a “pressure cleaner booster pump.”

**We support DOE’s clarification regarding the testing of two-speed pool filter pumps.** In the NOPR, DOE proposes to establish two test points for two-speed filter pumps: (1) a high flow point at the maximum speed on curve C; and (2) a low flow point at the low speed setting on curve C.<sup>3</sup> We agree with DOE that this approach would provide consistent and comparable ratings among two-speed filter pumps. We also support DOE’s proposal that the low speed flow rate cannot be below 24.7 gpm or 31.1 gpm for “small” and “large” two-speed pool filter pumps, respectively. These low flow rate limits correspond to the low speed test points for multi-speed and variable-speed pool filter pumps. We agree with DOE’s statement that “these flow rates would also be representative minimum flow rates for two-speed pool filter pumps and would effectively prevent the inclusion of unreasonably low speeds on two-speed pool filter pumps for the sole purpose of inflating WEF ratings.”<sup>4</sup>

**We support the proposed labeling requirements.** As DOE notes in the NOPR, the working group recommended that DOE investigate a label for DPPP.<sup>5</sup> In the NOPR, DOE proposes that the permanent nameplate of each DPPP include the WEF, rated hydraulic horsepower, DPPP nominal motor horsepower, DPPP motor total horsepower, and service factor.<sup>6</sup> We support the proposed labeling requirements, which will provide valuable information to both consumers and installers and may also help facilitate utility programs.

**We support the proposed certification requirements.** In the NOPR, DOE proposes a number of pieces of information to be included in certification reports and made public on DOE’s website. We support the proposed certification requirements. DOE notes that “such data are necessary for DOE to verify compliance of the given DPPP model, to determine the appropriate test procedure method to follow when verifying ratings, and to verify the accuracy of information provided on the label of any applicable DPPP models.”<sup>7</sup> The proposed certification reporting requirements will also provide useful information both to the public and to DOE for use in a future rulemaking

**We support the proposed optional test procedure for DPPP replacement motors.** As DOE notes in the NOPR, replacement DPPP motors are often sold to replace the original motor with which the pump was sold. DOE proposes in the NOPR an optional method to determine the WEF for replacement DPPP motors.<sup>8</sup> We support this optional test procedure, which could provide valuable information to consumers in making purchasing decisions as well as help facilitate utility programs incentivizing the sale of high-efficiency replacement motors.

**We appreciate that DOE has developed a verification procedure for DPPP freeze protection controls.** As DOE notes in the NPOR, the working group made recommendations

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<sup>3</sup> 81 Fed. Reg. 64605.

<sup>4</sup> 81 Fed. Reg. 64606.

<sup>5</sup> 81 Fed. Reg. 64628.

<sup>6</sup> 81 Fed. Reg. 64629.

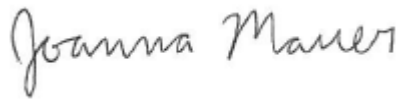
<sup>7</sup> 81 Fed. Reg. 64631.

<sup>8</sup> 81 Fed. Reg. 64629.

regarding requirements for DPPP's shipped with freeze protection controls and also recommended that DOE include a verification procedure that could be used by DOE. We appreciate that DOE has developed a verification procedure for DPPP freeze protection controls as part of the NOPR, which will provide the Department with the ability to verify whether a DPPP shipped with freeze protection controls meets the requirements recommended by the working group.

Thank you for considering these comments.

Sincerely,



Joanna Mauer  
Technical Advocacy Manager  
Appliance Standards Awareness Project



Lauren Urbanek  
Energy Efficiency Advocate  
Natural Resources Defense Council