



Consumer Federation of America

1620 I Street, N.W., Suite 200 * Washington, DC 20006

May 5, 2017

Mr. John Cymbalsky
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-5B.
1000 Independence Ave. SW
Washington, DC 20585

RE: Docket Number EERE-2015-BT-STD-0008/RIN 1904-AD52: Direct Final Rule for Energy Conservation Standards for Dedicated-Purpose Pool Pumps

Via e-mail to: PoolPumps2015STD0008@ee.doe.gov

Dear Mr. Cymbalsky:

Consumer Federation of America (CFA) is an association of more than 250 nonprofit consumer organizations that was established in 1968 to advance the consumer interest through research, advocacy, and education. We have long supported cost-effective energy efficiency standards as a means to save consumers money over the long run through lower monthly energy bills.

We are writing to express our strong support for the Direct Final Rule (DFR) for dedicated-purpose pool pumps published in the Federal Register on January 18, 2017. As an organization dedicated to protecting consumer interests, we support the standards contained in the Direct Final Rule and the process under which they have been adopted because of the significant benefits they will provide to consumers throughout the country. We urge you to allow the Direct Final Rule to take effect.

The standards in the DFR will provide substantial benefits to consumers who purchase dedicated-purpose pool pumps as well as to all electric utility customers. DOE's analysis shows that the standards for pumps for typical in-ground pools will save consumers more than \$2,000 on average over the life of the equipment. For all types of pool pumps, the incremental cost of more efficient pumps will be recovered in less than one year with the average lifetime of pool pumps ranging from four to seven years. On a national level, taking into account both costs and benefits, DOE estimates that the standards will save consumers \$11-24 billion. Further, the significant national energy savings from the standards in the DFR will help to defer or obviate the need for new power plants and transmission and distribution infrastructure, which keeps electricity rates for all consumers lower.

We also support the process under which these standards have been developed and their adoption by Direct Final Rule. Negotiated rulemakings can work to resolve substantive issues and arrive

at outcomes that provide consumer savings and meet the needs of manufacturers for a predictable regulatory environment with changes on a schedule that enables investments to proceed in an orderly fashion. The standards in this DFR are consensus-based and were developed with significant input from diverse stakeholders over several years. It saves taxpayers money by avoiding an unnecessarily protracted rulemaking process.

In closing, we urge you to let the Direct Final Rule for dedicated-purpose pool pumps stand--doing so benefits consumers and avoids wasting taxpayer dollars on further unneeded rulemaking activity.

Thank you for your consideration of our views.

Sincerely,



Mel Hall-Crawford
Director of Energy Programs
melhc@consumerfed.org



Mark Cooper
Director of Research
markcphd@gmail.com