



Consumer Federation of America

Submitted via e-mail to: DPPMotors2017STD0048@ee.doe.gov

October 23, 2018

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

RE: Docket Number EERE-2017-BT-TP-0048: Energy Conservation Standards for Dedicated-Purpose Pool Pump Motors, Notice of Request for Direct Final Rule

Dear Mr. Domm:

Consumer Federation of America (CFA) is writing to urge the Department of Energy to issue a direct final rule for dedicated-purpose pool pump motors as put forth in the Joint Stakeholder Proposal dated August 14, 2018 and published in 83 Fed. Reg. 45851 (September 11, 2018). 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 advocated for cost-effective energy efficiency standards for consumer products as they save consumers money on their energy bills and defer the need for new power plants which lead to higher electricity costs.

CFA was one of the joint stakeholders on the August 14, 2018 proposal to the Department. We see the proposal as a logical and needed follow-on to close a loophole in the energy-efficiency standards for dedicated-purpose pool pumps (“DPPPs”) which were adopted in 2017 through a direct final rule (“DFR”) rule process with a compliance date of July 19, 2021.

The DPPP standards will provide very large savings for consumers. As pointed out in the proposal there are more than 8 million pools in the U.S. DOE estimated average life-cycle cost savings for owners of in-ground pools of \$2,140 with a simple payback of less than 1 year. The average annual operating cost savings are about \$550. However, the DPPP standards do not address replacement motors, which presents a significant loophole that seriously threatens consumer savings from the standards. If the replacement motor loophole is not addressed, unregulated replacement motors would deny consumers energy savings. The motor on a pool pump will often fail before the pump itself needs to be replaced, and motor-only replacements are common. Without a complementary standard for DPPP motors, when replacing a pool pump motor, consumers will continue to be sold inefficient, wasteful products.

Clearly, it makes sense for DOE to issue energy efficiency standards for dedicated-purpose pool pump motors consistent with the standards for DPPP's especially with the broad support that this proposal has. We urge the Department to issue a DFR for dedicated-purpose pool pump motors with the same compliance date as the DPPP standards to avoid inconsistency in the marketplace so that consumers can realize energy savings in either case.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Mel Hall-Crawford". The signature is written in a cursive style with a large, stylized initial "M" and a long, sweeping tail that extends to the right.

Mel Hall-Crawford
Director, Energy Programs