January 19, 2018

Sharon Frey
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: ENERGY STAR® Draft 2 Versions 2.0 and 3.0 Specifications for Pool Pumps

Dear Ms. Frey,

The enclosed are the comments of the Appliance Standards Awareness Project (ASAP) and the Natural Resources Defense Council (NRDC), in response to the proposed revisions in the Draft 2 Versions 2.0 and 3.0 ENERGY STAR Pool Pump Specifications released on December 19, 2017. We appreciate the opportunity to comment.

We stand in strong support of the U.S. Environmental Protection Agency's (EPA) ENERGY STAR program and we support EPA's efforts to update the ENERGY STAR pool pump specification.

The ENERGY STAR program has a long history of identifying products with superior energy performance, which helps consumers and businesses save money and protect the environment. ENERGY STAR is one of the most widely recognized and well-trusted brands. Almost 85 percent of American households understand what the label means, and nearly half of all consumers purchased an ENERGY STAR labeled product in the past year.[1] Across the ENERGY STAR program, a $50 million annual budget produces more than $30 *billion* worth of annual consumer utility bill savings.[2]

There has been an ENERGY STAR specification for pool pumps since 2013. Given that the U.S. Department of Energy (DOE) recently finalized the first-ever national minimum efficiency standards for pool pumps, along with an accompanying test procedure, we concur with EPA that the time is ripe for an update to the ENERGY STAR specification.

We support setting the efficiency level at EL 6 for large self-priming pumps for Version 2.0.

We appreciate EPA's reconsideration of the efficiency level for large self-priming pumps for Version 2.0. As we noted in our comments on Draft 1, EL 6 in the DOE analysis was selected such that all current variable-speed pumps would comply, and DOE's analysis shows that there are pumps across the full range of sizes that already meet EL 6.[3] Setting the efficiency level for large self-priming pumps at EL 6 for Version 2.0 will result in greater savings and will align Version 2.0 with the 2021 DOE standards.

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[1] https://www.energystar.gov/sites/default/files/asset/document/PowerOfTheBrand_2017.pdf
[2] https://www.energystar.gov/about/origins_mission/energy_star_numbers
[3] https://www.energystar.gov/sites/default/files/ASAP%20NRDC%20ES%20Pool%20Pump%20Comments%2010-26-17.pdf. p. 2

We support the proposed freeze protection requirements.
We appreciate EPA's consideration of freeze protection requirements and the proposal in Draft 2 to add DOE's freeze protection requirements to the ENERGY STAR specification. As we noted in our comments on Draft 1, these freeze protection requirements will provide additional savings in advance of the 2021 DOE standards.[4]

We encourage EPA to clarify the treatment of integral cartridge and integral sand filter pumps.
The energy efficiency requirements in Draft 2 include the statement that "All Integral Sand Filter Pool Pumps and Integral Cartridge Filter Pool Pumps shall be distributed in commerce with a timer with maximum 10 hour timeout, which is either integral to the pump or a separate component shipped with the pump."[5] However, the proposed scope of included products does not include integral cartridge or integral sand filter pumps.[6] We encourage EPA to clarify the eligibility of integral cartridge and integral sand filter pumps for the ENERGY STAR specification.

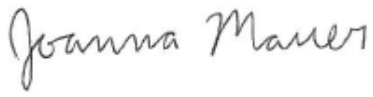
The proposed change to the optional connected criteria appears to be reasonable.
In Draft 2, EPA proposes to change the Demand Response requirements from RPM-based requirements to flow-based requirements.[7] EPA notes that this change should reduce test burden, since flow is typically measured when testing pool pumps, and that there should be no impact on the requirements since there is a direct relationship between RPM and flow rate.

Thank you for considering these comments.

Sincerely,

Lauren Urbanek
Senior Energy Policy Advocate
Natural Resources Defense Council

[4] https://www.energystar.gov/sites/default/files/ASAP%20NRDC%20ES%20Pool%20Pump%20Comments%2010-26-17.pdf. p. 4
[5] https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Pool%20Pumps%20V2V3%20Draft%202%20Specification.pdf. p. 8
[6] https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Pool%20Pumps%20V2V3%20Draft%202%20Specification.pdf. p. 6
[7] https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Pool%20Pumps%20V2V3%20Draft%202%20Specification.pdf. p. 12



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