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Comments on Draft 2, V2.0 and V3.0 Energy Star Pool Pump Program Requirements

Hayward Pool Products, a division of Hayward Industries Inc., supports the EPA in its efforts to align the EnergyStar program efficiency reporting method with the recent Department of Energy DPPP rulemaking. The resources required to comply with the DOE DPPP rulemaking requires a substantial commitment in resources from manufacturers therefore all opportunities to harmonize these two programs and minimize the financial impact to manufacturers should be considered.

To this point, Hayward respectfully submits the following questions and comments regarding the Draft 2 Versions 2.0 and 3.0 proposals.

#### Verification Testing

1. Hayward understands EPA's position on continuing verification testing as part of the Energy Star program. Aligning with EPA's commitment to continue to ensure that the verification testing burden is as minimal as possible while providing the necessary feedback to ensure confidence in the product performance metrics, Hayward proposes that the EPA consider a minimum sample size of one, rather than the two samples currently being proposed for verification testing. While the DOE DPPP test procedure specifies a minimum sample size of two for reporting and/or certification, Energy Star verification testing is primarily to verify that products in the market continue to align with the Energy Star specifications, not to support certification. Since there are significant additional costs associated with multiple samples (unit procurement costs and 3rd party testing – up to an additional \$2000-\$4000 per pump model selected) and that multiple samples are not always necessary for verification testing in order to ensure confidence in the product performance metrics, we recommend allowing manufacturers to work with the 3<sup>rd</sup> party verification agency to determine an appropriate sample size at the time of selection. Further, we support allowing a manufacturer to choose to test additional models if desired, however we recommend the EPA continue to allow a minimum sample size of one for verification testing.

#### Initial Qualification Testing

2. Currently, "Standby" and "Demand Response" are not defined in the DOE DPPP test procedure. Since the EPA is proposing a minimum sample size of 2 units for initial qualification testing under V2.0 & V3.0, does EPA anticipate that a minimum sample size of two would apply to these tests as well and if so, what would the reported value be based on?

### Initial Qualification Testing (Cont'd)

3. The current draft proposes that manufacturers continue to report Energy Factor, Flow, and Power at Curves A and B in addition to the Weighted Energy Factor for the pump. Hayward believes that continuing to report Energy Factor at curves A and B will add to confusion in the market and slow the adoption, utilization, and understanding of the DOE WEF metric.

The DOE DPPP test procedure only supports utilization of Energy Factor until 2021. It is not clear what the additional value would be to pool pump installers by providing the EF and Power at the Curve A and B intersection points at maximum speed. In our experience, it is the pump performance curve that is used for pump sizing calculations, not the Energy Factor and Power at the intersection points of the theoretical system curves. Pump performance curves are already published by manufacturers and readily available to pool installers. We therefore recommend that the EPA focus solely on the Weighted Energy Factor of the pump to further support the adoption of this metric in the industry and not require the reporting of EF and Power at Curves A and B.

### Qualified Product Database

4. Upon implementation of the Energy Star V2.0 requirements, manufacturers and distributors will likely have inventory of pumps that were Energy Star compliant to the V1.1 specification and built prior to the V2.0 effective date. To continue to support acceptance of and utility rebates to customers, does the EPA intend to maintain an "archive" list of pumps that are certified to V1.1, but are no longer certified to V2.0?

Hayward is very thankful to the Environmental Protection Agency for the opportunity to provide input and comment on these important changes to the EnergyStar program for pool pumps. As a leading equipment manufacturer, representing thousands of employees and, in turn, thousands more pool professionals and their customers, we look forward to working with EPA on the development of this important next step for the pool pump EnergyStar program.

Sincerely,



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