MEMORANDUM

RE: Ex Parte Communications in Connection with
Docket No. EERE–2010–BT–STD–0027
Energy Conservation Standards for Commercial and Industrial Electric Motors: Public Meeting and Availability of the Preliminary Technical Support Document
77 Fed. Reg. 43015 (July 23, 2012)

To: expartecommunications@hq.doe.gov

From: Alex Boesenberg, Manager of Regulatory Affairs
National Electrical Manufacturers Association

Date: May 21, 2013

Encl: Motor Coalition Presentation

This memorandum memorializes a communication involving members of the Motor Coalition (industry and energy advocates) in connection with this proceeding. The Motor Coalition thanks the DOE for permitting us to meet with you on May 13th, 2013 to discuss the Motor Coalition Petition for Direct Final Rule and the related Rulemaking for Electric Motor performance standards, which is the subject of the above docket number.

Attendees of the May 13th meeting were as follows: John Cymbalsky (DOE), Ashley Armstrong (DOE), Matthew Nardotti (Navigant), John Malinowski (Baldor), Emmanuel Agammloh (Advanced Energy), Kit Butler(Advanced Energy), Michael Kido (DOE), Jim Raba (DOE), Roger Daugherty (Baldor), Neal Elliott (ACEEE), Rob Boteler (Nidec), Michael Rivest (Navigant), Ami Grace-Tardy (DOE), Dan Cohen (DOE), Doug Rawald (DOE), Alex Boesenberg (NEMA), Andrew deLaski (ASAP), and Meg Waltner and Ben Longstreth (NRDC) by phone.

Members of the coalition began by summarizing the events and timeline of the Rulemaking for Electric Motors and of the related Motor Coalition petition. They stressed the strong consensus and collaboration of members of the Coalition, and the value it presents to the rulemaking process. The approach given in the petition stresses two main areas. First, the petition suggests a significant expansion of the definition of an electric motor, thus expanding the scope and coverage of the rule and related energy savings. Second, the petition recommends that virtually all motors that would be covered by the national standards be required to comply with the NEMA MG 1-2011, table 12-12 full load efficiencies for premium efficiency electric motors. Broad application of these very high efficiency levels will achieve large, cost effective savings, simplify compliance and enforcement and be achievable within just two years of final rule publication.

Members of the coalition noted that an expansion of the definition of an Electric Motor would sweep up a notable amount of heretofore not covered products, resulting not only in significant energy savings but also closing numerous loopholes. The performance levels suggested by the coalition leverage technology solutions and bills of materials which have already been developed and testing during conformance of existing covered products to current regulations. These solutions are readily implementable, and their limitations known, unlike performance levels higher than NEMA MG 1-2011 table 12-12 which contain significant challenges therein, particularly as related to motor case size and physical dimension changes. The Coalition stressed the added challenge and impacts on downstream manufacturing presented by physical changes in motor size, and the impacts these would have on timing. Not only would motor

manufacturers have to spend many more months designing, testing and certifying motors with highly elevated performance requirements, the later arrival of the specifics of those motors and their delayed availability would create similar hardships for the consumers of those motors, downstream final product assemblers.

Coalition members stressed their concerns that performance requirements above NEMA MG 1-2011 table 12-12 would result in greater incidence of re-use and repair of older motors, thus losing all potential energy savings which might result from a new motor purchase. This is related both to the above detailed physical dimension challenges and to first cost. A repair technician working on an installed piece of equipment who is unable to locate a new motor of the same physical dimensions is much more likely to buy a used or rebuilt motor (designed to older efficiency requirements, or none at all) than buy a new motor and adapt the equipment to it. Likewise, large industries with supplies of used and takeoff motors would be more inclined to dig out a substitute if physical dimension or cost considerations force them down that path. The coalition stressed that regulation at performance levels higher than NEMA MG 1-2011 table 12-12 for the covered scope of motors will cause these concerns to be impacted, resulting in lost energy savings opportunities.

If the DOE chooses not to accept the Motor coalition petition for Direct Final Rule, the Coalition stressed the merits of the scoping and efficiency performance levels contained in the petition and suggested the DOE use the petition as the basis for a proposed and, subsequently, a final rule. The coalition recommended that a final rule take effect two years after final rule publication (assuming the DOE uses the performance levels recommended in the petition).

Coalition members also reiterated the coalition's perspective that all motors recommended for coverage can be tested using the existing motors test method. The coalition has previously described specific adjustments to some products that may be needed to test motors recommended for coverage. Staff from Advanced Energy, a third party motor testing laboratory, spoke to general practices and procedures in the independent testing realm, specific to motors and partial motors. In this case the reference to partial motors included not only those motor parts supplied to end-users for final assembly, but also to motors removed from other equipment for testing, i.e. imported machinery.

The Coalition also discussed motor scaling practices in the Rulemaking, citing concerns regarding accuracy and application.

The Coalition noted that in the next survey of this type that it might be wise to ask the consultants to survey OEMs and end users for impact from changes.

The Motor Coalition and all its members thank the U.S. Department of Energy for attending the meeting and for considering the points made therein.

If you have any questions on these comments, please contact Alex Boesenberg of NEMA at 703-841-3268 or alex.boesenberg@nema.org or Andrew deLaski of ASAP at 617-363-9470 or adelaski@standardsasap.org.

Sincerely,

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