

MEMORANDUM OF EX PARTE COMMUNICATION WITH THE DEPARTMENT OF ENERGY

Date: Tuesday, July 24, 2018

Attendees:

Ashley Armstrong, DOE
Carl Chidlow, Association of Pool & Spa Professionals registered Federal lobbyist
John Cymbalsky, DOE
Sam Dose, Hayward Pool Products
Jeff Farlow, Pentair Aquatic Systems
Jennifer Hatfield, Association of Pool & Spa Professionals
Joanna Mauer, Appliance Standards Awareness Project
Sofie Miller, DOE
Bill Newton, Florida Consumer Action Network
Ken Osborne, Regal Beloit America, Inc.
Regan Ratliff, Association of Pool & Spa Professionals
Lauren Urbanek, Natural Resources Defense Council

On July 24, 2018, the Association of Pool & Spa Professionals (APSP) and its industry members, and consumer and efficiency advocate groups met with the Department of Energy (Department). This meeting served as an opportunity to brief the Department on the Joint Stakeholder recommendations for standards for dedicated-purpose pool pump motors, which resulted from a private negotiation among the stakeholders. In addition to the PowerPoint presentation, a working document was also presented to the Department that is the result of the work of the stakeholders over the past 9 months. Both documents are attached.

The stakeholders would also like to provide the following additional information that was not included in the PowerPoint related to the recommendations for dedicated-purpose pool pump motor standards to complement the already-established dedicated-purpose pool pump standards:

1. The compliance date for the dedicated-purpose pool pump standards is July 19, 2021, and it is essential that this compliance date not be delayed. Manufacturers have already made significant investments to upgrade their product lines in order to comply by this date. Delaying the compliance date would mean that these investments would be stranded, putting American manufacturers at a competitive disadvantage with overseas manufacturers who have not yet invested to meet the new standards.
2. Protecting the significant electricity savings from the dedicated-purpose pool pump standards will also protect the corresponding reductions in peak demand, which bolster electric grid resilience. Reductions in peak demand also help lower electricity rates, which benefits all consumers.

3. Low-income consumers are generally not impacted by the dedicated-purpose pool pump standards, nor would they be impacted by the recommended complementary motor standards. Data collected by APSP shows that the average income of households with in-ground pools is \$134,000 (compared to \$79,000 for households with above-ground pools). Single-speed pumps and motors will continue to be able to serve small in-ground pools and all above-ground pools under both the dedicated-purpose pool pump standards and the recommended pool pump motor standards.
4. In addition to all the major pool pump manufacturers, the three primary pool pump motor manufacturers serving the U.S. market (Regal Beloit, Nidec, and WEG) have participated in our working group from the beginning and support the joint recommendations.