

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
Natural Resources Defense Council
Northwest Energy Efficiency Alliance

March 9, 2022

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

RE: Docket Number EERE–2022–BT–TP–0003: Request for Information for Test Procedures for Dedicated-Purpose Pool Pumps

Dear Mr. Dommu:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), Natural Resources Defense Council (NRDC), and Northwest Energy Efficiency Alliance (NEEA) on the request for information (RFI) for test procedures for dedicated-purpose pool pumps (DPPPs). 87 Fed. Reg. 3457 (January 24, 2022). We appreciate the opportunity to provide input to the Department.

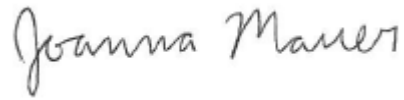
We encourage DOE to expand the scope of the test procedure to cover pumps designed for commercial applications. As DOE describes in the RFI, for pool filter pumps, the current test procedures apply to pumps with hydraulic output power less than 2.5 horsepower. Larger pool filter pumps are commonly installed in commercial applications. While large public pools make up a small portion of all in-ground pools, one paper estimated that these commercial pools account for almost half of total pool pump energy use.¹ Including these larger pumps in the DPPP test procedure will help ensure that purchasers have access to efficiency information based on a standardized test method.

DOE notes in the RFI that the head and flow characteristics of commercial pool applications are significantly different from residential installations. We therefore encourage DOE to investigate representative test points and system curves for DPPPs designed for commercial applications.

Thank you for considering these comments.

Sincerely,

¹ Worth, C., T. Rosenfeld, G. Gockel, and G. Fernstrom. "A Cannonball of Opportunity: The Hidden Savings Potential from Large Public Swimming Pools." Proceedings from the 2018 ACEEE Summer Study on Energy Efficiency in Buildings.



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