

Appliance Standards Awareness Project
Northwest Energy Efficiency Alliance
Northwest Power and Conservation Council (staff)

March 4, 2021

Mr. Jeremy Dommu
U.S. Department of Energy
Office of General Counsel, EE-2J
1000 Independence Avenue SW
Washington, DC 20585

RE: Docket Number EERE–2017–BT–TP–0047/RIN 1904–AE18: Final Rule; Delay of Effective Date for Test Procedures for Small Electric Motors and Electric Motors

Dear Mr. Dommu:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), Northwest Energy Efficiency Alliance (NEEA), and staff of the Northwest Power and Conservation Council on the final rule; delay of effective date for test procedures for small electric motors and electric motors. 86 Fed. Reg. 7798 (February 2, 2021). We appreciate the opportunity to provide input to the Department.

We urge DOE to use the open docket on electric motor test procedures to expand the scope of motors covered by DOE test procedures. In our comments on the 2017 RFI¹ and the 2019 NOPR² for test procedures for small electric motors and electric motors, we urged DOE to significantly expand the scope of motor test procedures. However, in the January 2021 final rule, DOE declined to do so.³ In 2020, DOE initiated a separate rulemaking for test procedures for electric motors. Since the Energy Policy and Conservation Act (EPCA) authorizes DOE to regulate “other motors,”⁴ DOE should now focus on using the open test procedures docket concerning “electric motors”⁵ as the venue for expanding the scope of test procedures to include additional motors that are not currently regulated.

As we have described in previous comments, we urge DOE to expand the scope of motor test procedures to cover a wide range of additional motors including a wider range of horsepower ratings for single and polyphase motors and additional frame sizes; additional motor topologies; and air-over motors and submersible motors. Test procedures help differentiate new technologies in the marketplace and allow purchasers to make informed decisions when considering multiple motor

¹ <https://www.regulations.gov/comment/EERE-2017-BT-TP-0047-0027>.

² <https://www.regulations.gov/comment/EERE-2017-BT-TP-0047-0087>.

³ 86 Fed. Reg. 9.

⁴ 42 US Code 6311(2)(B)(xiii).

⁵ EERE-2020-BT-TP-0011.

options. Given that motors account for 53% of world electricity demand,⁶ adopting test procedures and establishing standards for additional motor types that are not currently regulated could deliver very large energy savings.

Thank you for considering these comments.

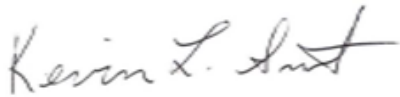
Sincerely,



Kanchan Swaroop
Technical Advocacy Associate
Appliance Standards Awareness Project



Louis Starr, P.E.
Sr. Energy Codes and Standards Engineer
Northwest Energy Efficiency Alliance



Kevin Smit
Senior Analyst
Northwest Power and Conservation Council

⁶ International Energy Agency, "World Energy Outlook 2016". See Figure 7.9. available at iea.org.