

MEMORANDUM OF EX PARTE COMMUNICATION WITH THE DEPARTMENT OF ENERGY

Date: Tuesday, February 5, 2019

Attendees:

Alex Boesenberg, National Electrical Manufacturers Association
Rob Boteler, Nidec Motor Corporation
Daniel Cohen, DOE
Dan Delaney, Regal Beloit America, Inc.
Sam Dose, Hayward Pool Products
Jeff Farlow, Pentair Aquatic Systems
Chandra Gollapudi, Regal Beloit America, Inc.
Jennifer Hatfield, Association of Pool & Spa Professionals
Johanna Jochum, Babst Calland
Michael Kido, DOE
Sofie Miller, DOE
Kevin O'Donnell, WEG Commercial Motors
Shajee Siddiqui, Zodiac Pool Systems LLC
Clark Silcox, National Electrical Manufacturers Association

On February 5, 2019, the Association of Pool & Spa Professionals (APSP) and the National Electrical Manufacturers Association (NEMA), along with some of their industry members, met with the Department of Energy (Department). This meeting served as a follow-up to a previous meeting held December 12, 2018, allowing industry an opportunity to provide additional information to the Department in regard to the Joint Stakeholder Proposal for a Direct and Final Rule, 83 FR 45481 (September 18, 2018). Industry is looking for a path forward in order to prevent erosion of energy savings contemplated by the Dedicated-Purpose Pool Pump Final Rule, 82 FR 5650 (January 18, 2017), if a replacement pool pump motor loophole is not addressed.

APSP, NEMA and their respective members provided examples of general-purpose motors versus pool pump motors, as well as information on consumer impact if the pool pump motor loophole is not addressed. Additional information on what the payback is as well as market impact if the motor is not addressed was provided. The industry offered an alternative approach for the Department to consider, suggesting they initiate a rulemaking under 42 U.S.C. § 6315(c) and (g) for a labeling rule for DPPPMS.

A PowerPoint presentation was provided along with a copy of the draft UL 1004-10 Standard, both documents are attached to this memorandum.