

DOCKETED

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*Comment Received From: Sam Dose
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Comments on Flexible Demand Appliance Standard

Additional submitted attachment is included below.



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April 10, 2023

Submitted via: Docket Log 23-FDAS-01
Commissioner J. Andrew McAllister, Ph.D.
California Energy Commission
Dockets Office, MS-4
1516 9th Street
Sacramento, CA 95814

Re: Comments on Pool Controls Rulemaking, Docket # 23-FDAS-01

Dear Commissioner McAllister

Hayward Pool Products is a division of Hayward Industries, a North Carolina based company, and is one of the world's leading manufacturers of swimming pool equipment including pumps, filters, heaters, automatic cleaners, sanitizers, automation and lights. We have been an active participant in the CEC efforts to establish new requirements for Pool Pump Controls under the new Flexible Demand Appliance Standard, and support your efforts to establish an effective regulation.

We are members of the Pool and Hot Tub Association, (PHTA), as well as their Energy Coalition. We have reviewed the comments submitted by Jennifer Hatfield on behalf of our PHTA members and fully support her position.

We are submitting additional Hayward comments below and welcome your careful consideration of these, and look forward to an outcome that meets our expectations. If you have any questions on these comments, please contact Sam Dose of Hayward Industries at sdose@hayward.com.

Sincerely,

Sam Dose

Sam Dose
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**Hayward Comments and Suggestions on
Flexible Demand Appliance Standards for Pool Controls**

1. Alignment of Staff Report and Draft Regulation: As previously communicated, Hayward supports California and the Commission's efforts to reduce energy demand and lessen greenhouse gas emissions by establishing a statewide flexible demand appliance standard (FDAS) for pool controls. We find your draft regulation to lack clarity and alignment with your published Staff Report and support PHTA recommendations to improve alignment. We support recommended definition modification as well as the additional proposed definitions.
2. Effectivity Date: We are concerned with your proposed effectivity date of 12 months following final approval and publication. Our normal development cycle would be 36-48 months to allow for validation of designs in our labs and in field tests. In addition supply chain constraints continue to increase lead times, especially for electronic components. Some electronic component lead times continue to exceed 12 months, and while we make every effort to mitigate these, it is difficult to guarantee that we would be successful for every required purchased part. We support PHTA's request for an effectivity date 36 months following adoption.
3. Priming Time: We appreciate the CEC efforts to allow off-cycle time to facilitate pump priming by proposing a 15-minute allowance. While most pumps in the market today will be able to meet this requirement, we know that actual priming is as much a function of pool construction as pump performance. One critical factor is the height difference between the pool water level and the location of the pump. We support PHTA's recommendation for a 30-minute priming time allowance.
4. Conclusion: The suggested PHTA modifications to the proposed regulatory language are opportunities for further improvement that we urge the Commission consider. These recommended changes will ultimately provide clarity that is needed in terms of what is and is not in scope; eliminate requirements that will stifle innovation; and provide adequate time for manufacturers to develop and validate products prior to introduction in the market.