

DOCKETED

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September 18th, 2023

California Energy Commission
Docket Unit
Re: Docket No. 23-FDAS-01, Docketed Date: 9/1/2023
715 P Street
Sacramento, CA 95814

Re: Pool Controls Rulemaking, TN # 252113, Docket 23-FDAS-01, Docketed Date: 9/1/2023

Esteemed California Energy Commission,

Fluidra appreciates the opportunity to participate in the rule making process for Flexible Demand Appliance Standards (FDAS) to meet the GHG reduction and electric grid resiliency goals of California Senate Bill SB 49. As a pool equipment manufacturer with U.S. Headquarters in California, Fluidra recognizes the importance and demand for energy efficient and environmentally sustainable swimming pool operation. Accordingly, continual efforts are made in the development of products that can meet the competitive goals of a sustainable future.

As a member of the Pool & Hot Tub Alliance Fluidra fully supports and endorses the comments jointly submitted by the Pool & Hot Tub Alliance (PHTA). In addition, we submit the following comments intended to assist the Energy Commission develop Flexible Demand regulation that can achieve and maximize the energy goals of the FDAS program, while sensibly minimizing negative impact to the consumer and the pool industry. Fluidra hopes to provide helpful insight into the possibilities, complexities, consumer engagement, and safety considerations for Flexible Demand Response in a swimming pool system.

DEFINITIONS

Fluidra proposes the following revisions to the definitions in order to clarify the intent of what is "in scope" and "out of scope".

Integral pool filter pump control or pump motor control

Fluidra suggests to keep the definition of "integral" as shown below.

"Integral", when used with respect to pool controls, means controls that are an integral part of a pump or pump motor. Integral controls may be capable of being removed and may be sold separately from the pump or pump motor.

The term is used in the proposed exclusion "(C) controls integral to a single pool filter pump or pump motor that are capable of controlling only that pump or motor." The definition serves to clarify the intent of the scope, and also clarifies that the integral pump motor control is removable for remote mounting and replacement. This is critical for installations with limited access to the pool

pump, a user can mount the pool pump control in a more safely accessible location proximate to the pump. Also, being able to replace an inoperable pump control, instead of the entire motor/pump assembly, is an important cost saving benefit for consumers.

Pool Control

Fluidra supports the PHTA proposed definition of "Pool control". –

With regards to the original CEC proposed language, there is concern that CEC is making "Pool controls" and "Pool pump controls" synonymous. In other words, anything that controls a single pool filtration pump is within the scope of the regulation which may or may not be the intention.

In previously submitted comments and discussions with CEC, Fluidra and PHTA expressed the importance of using "Pool Controls", also known as "Pool Automation" systems, for the purposes of Flexible Demand due to critical safety and liability concerns of altering and/or interrupting the pool filtration pump without consideration to the rest of the pool equipment. In addition to the Pool Filtration Pump, Pool automation systems are designed to talk to the other critical equipment on a pool pad such as water chemistry analyzers, chemical feeders, chlorinators, and heaters which rely on water circulation for safe operation and maintaining water chemistry. A controller that only talks to the filtration pump, and no other piece of pool equipment, may present safety and liability risks when used for Flexible Demand. We remind CEC to consider these practical safety concerns as the final language for this regulation is being considered.

PHTA proposed definition of "Pool control":

"Pool control" means equipment with the capability to start, stop, or otherwise control the operation of a pool filter pump and includes, but is not limited to, a pool timer, pool pump switch, heater switch, direct load control switch, or any component or group of components, including software, that has the capability to schedule the operation or control the start or stop times of a pool filter pump. Pool controls may control other pool equipment in addition to a pool *filter* pump.

1. Pool control excludes:

(A) controls marketed exclusively for use as a control for pool filter pumps with a rated hydraulic horsepower (hhp) greater than 2.5 hhp; or

(B) safety interlock or shutoff controls; or



(C) controls integral to a single pool filter pump or pump motor that are capable of controlling only that pump or motor; or.

(D) Manually operated on/off switches, circuit breakers and similar devices that are only able to turn the pool filter pump on or off are not considered a pool control.

COMMUNICATION REQUIREMENTS

Fluidra suggests the following edit to the communication requirements Section 1693 (b)(2)(A).

(A) Communication Requirements.

1. Pool controls shall be connected devices or connected ready devices.

Pool controls, or Pool Automation Systems, can be modular systems with the means for connectivity being separable hardware. Being able to sell these systems separately is important to consumers and the life of these products because it allows a consumer who already has a connected pool pad to upgrade their pool automation system without the need to repurchase the connectivity hardware they already have. In addition, as communication protocols and reliability are updated, a consumer can purchase the most up to date connection hardware separately. Or if a consumer does not wish to connect their pool automation system, then they do not need to spend the money to purchase hardware they will not use. So long as the system is "connected ready", we believe this meets the intent of this regulation.

Section 1693 (b)(6)(C) Communication

Fluidra requests further clarification on requirements for communication capabilities.

Request definition for "operating status" -- On/off? Power Consumption? Speed?

Request clarification on "stored schedule". Only the current operating schedule, or all schedules within the pool control?

Section 1694 (b)

Fluidra requests further clarification on the communication link capabilities:

Request definition for "shift"



Request definition for "curtail" -- On/off? Turn down pump? Turn off heater?
Reduce overall power consumption of all pool equipment?

Request clarification on "changes to equipment operation or schedule". What
kind of operating changes will be necessary via communication link?

EFFECTIVE COMPLIANCE DATE

Fluidra fully supports PHTA's suggest to not tie the effective compliance date to the Federal DOE pool pump motor rule. These are two distinct product/business streams that do not need to be tied together for purposes of this regulation.

Fluidra also supports and agrees with PHTA's estimated development timeframe of four years to develop, qualify, test, certify, and launch new products into the marketplace. We urge CEC to consider this when finalizing an effective compliance date.

Thank you for the opportunity to participate in this rulemaking process. We look forward to working with CEC in the development of a sustainable pool industry.

Respectfully,



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