

March 30, 2012

Roland Risser, Director
Building Technologies Program
U.S. Department of Energy
Mail Stop EE-2J
1000 Independence Ave, SW
Washington, DC 20585

Dear Mr. Risser,

We are writing to update you on the progress on potential energy conservation standards for certain types of pumps that energy efficiency advocates and pump manufacturers have been jointly working on through the Appliance Standards Awareness Project (ASAP) and the Hydraulic Institute. We have agreed on a tentative path forward on the following four components of a potential consensus agreement:

1. Energy conservation standards for water pumps: We have agreed to pursue recommended standard levels for rotodynamic pumps for pumping clean water based on the draft EU regulations for water pumps. The draft EU standards establish minimum efficiency levels at three different load points. This approach provides more accurate energy savings estimates in field applications compared to a standard based on a single load point. The first tier of the EU standards, which is intended to eliminate the least-efficient 10% of current products, is scheduled to go into effect in 2013, and a second tier, intended to eliminate the least-efficient 40% of current products, is scheduled to go into effect in 2015.
2. Energy conservation standards for circulators: We have agreed to pursue recommended standard levels for circulators (pumps used primarily in hydronic heating applications) based on the EU regulations for circulators. The EU standards are based on the “Extended Product approach,” where the “product” is the package that includes the pump, motor, drive, and controls. The first tier of the EU standards will go into effect in 2013 with a second tier following in 2015.
3. Certification and labeling: We have agreed to pursue a certification and labeling scheme for pumps. We believe that a potential approach could involve the Hydraulic Institute becoming a NVLAP-certified accreditation body to accredit manufacturer test labs for certification testing, and DOE establishing a label to reflect pump efficiency in addition to other critical application parameters.
4. Extended Product approach: We have agreed to pursue a scheme to label “extended product” water pumps (i.e. a package including the pump, motor, drive, and controls), which could facilitate the increased adoption of products that can provide large energy savings. We are also considering the potential for energy conservation standards for “extended product” water pumps, and we are currently exploring the technical and legal issues associated with this approach.

As we work towards a consensus agreement, it will be important to be able to estimate the potential energy savings from any recommended standards and the cost-effectiveness of specific standard levels, including the Extended Product approach. A significant challenge that we are currently facing is the lack of data on the U.S. pumps market. We would welcome any assistance that DOE can provide in this regard.

We would like to request a meeting with DOE senior staff focusing on codes and standards to present our planned path forward and to discuss how DOE may be able to assist the negotiation process. Our delegation is made up of executives from the pump industry, the Hydraulic Institute staff, and leaders from the energy efficiency advocacy community involved with negotiations. The delegation is available to meet on the following days: April 11, April 12, April 30, May 1, and May 4.

Please coordinate with Joanna Mauer, Technical Advocacy Coordinator with ASAP, and Robert Asdal, Executive Director of Hydraulic Institute to finalize a meeting date. Ms. Joanna Mauer's contact information is: (202) 507-4034 or jmauer@standardsasap.org; and Mr. Robert Asdal's contact information is: (973) 267-9700 x113 or rasdal@Pumps.org.

We appreciate your attention to this request and look forward to presenting the progress we have made to you in the near future.

Sincerely,



Andrew deLaski
Executive Director
Appliance Standards Awareness Project



Robert K. Asdal
Executive Director
Hydraulic Institute, Inc.

cc. Henry Kelly
Kathleen Hogan
John Cymbalsky
Dan Cohen
Charles Llenza