

**MIKE GARDNER POOLS**  
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I am here on behalf of the 3700 small business owners who belong to the Independent Pool and Spa Service Association, IPSSA nearly 3000 of whom operate in California. I am the Regional director for Region I IPSSA here in Northern California. I hold a California State Contractor's C-53 license and have been in the pool industry for 29 years, both in Southern and Northern California.

We believe that the provisions presented in Title 20 will work great for new construction as well as remodels where the decks are removed so that the underground plumbing can be changed. However we feel that the imposition of the regulations on direct replacement motors would create a problem that would be contrary to the goals of Title 20. Most existing pools are not plumbed with multi speed pumps in mind and many have multiple skimmers which are rendered useless for surface cleaning at low speed thereby encouraging the homeowner to go out and turn the pump to high speed. Many pool cleaners will not function at low speed and diatomaceous earth filters need to run at high speed to be most effective. Sand filters would need to be replaced as low speed will not flow through the media. We as an association have been the link between the pool that the builders have built and the consumer's budget. We work with the homeowner to arrive at the most efficient way to run their pool and give them the most enjoyable experience for the lowest cost.

We have for years downsized pumps for our clients as newer pumps have gotten more efficient. With the current language we will continue to be allowed to perform this cost and energy saving function.

Also it may encourage the upsizing of pumps to get higher flow rates at low speed. PG&E has requested the exemption from the efficiency standards for low speed.

We are concerned that the regulation will return us to the days of rebuilding the old motors, which may not be energy efficient but will be cheaper to rebuild than to install a new controller and multi speed motor.

We have participated in the rebate programs and have carved large numbers from our customer's utility bills. We wish to be able to use our expertise to make the decision as to when it is appropriate to install a two speed motor based on the individual existing pool, not a regulation that will create the appearance of energy savings only to be thwarted by a homeowner who "knows how to program his pump".

Thank you for your time and consideration. I am available to answer any questions you may have.

Mike Gardner