American Council for an Energy-Efficient Economy
National Electrical Manufacturers Association

March 22, 2007

The Honorable John D. Dingell
Chairman
Committee on Energy and Commerce
U.S. House of Representatives
Washington, DC 20515

The Honorable Joe Barton
Ranking Member
Committee on Energy and Commerce
U.S. House of Representative
Washington, DC 20515

Re: Energy Efficiency Standards for Electric Motors

Dear Chairman Dingell and Representative Barton:

The American Council for an Energy Efficient Economy (ACEEE) and the National Electrical Manufacturers Association (NEMA) are pleased to jointly recommend important changes and additions to the current national energy efficiency standards for poly-phase, integral-horsepower induction electric motors. We submit these recommendations for your consideration for inclusion in energy legislation now under development by your respective committees, and we urge their enactment at the earliest opportunity.

We recommend that the following changes to the *Energy Policy Conservation Act*, as amended by the *Energy Policy Act of 1992*, take effect 36 months from the date of enactment:

1. The minimum efficiency standards of general purpose, poly-phase, integral-horsepower induction motors currently covered by Federal efficiency standards should be increased to the "NEMA Premium" efficiency level specified in NEMA Standards Publication MG-1 (2006), Table 12-12, with the exception of "fire pumps" that will remain at the current Table 12-11 level as specified in EPAct 1992. (We note that this level of efficiency is already required for new motors acquired for Federal facilities by the purchasing guidelines of the Federal Energy Management Program.)

2. Efficiency standards should be enacted for two categories of low voltage poly-phase, integral-horsepower induction motors not currently covered under federal law:

a.) seven motor modifications excluded from EPAct 1992 standards of electric motors sized from 1 to 200 horsepower (HP) should meet the efficiency standards currently applicable to general purpose motors of the same size (i.e., efficiency levels specified in NEMA Standards Publication MG-1 (2006), Table 12-11), and

b.) general purpose motors of NEMA design "B" 201 to 500 horsepower should meet efficiency levels specified in NEMA Standards Publication MG-1 (2006), Table 12-11, for motors larger than 200 horsepower.

The Department of Energy is currently scheduled to complete a final rule on possible revisions to the existing standard for integral 1-200 horsepower general purpose motors by June 2011, with an effective date likely to be 2014 or later. Our recommendations, if enacted, will achieve substantial savings as early as 2011, and will greatly expand the scope of covered products. We estimate the savings attributable to these joint recommendations to be 8 billion kilowatt hours by 2030, with a net energy savings to consumers of almost $500 million.

In light of the accelerated timetable for the implementation of these standards, we also expect to be jointly recommending to the Ways and Means and Finance Committees a set of production tax credits for motor manufacturers for incremental increases in the production of efficient motors during the 36 month interval before the effective date of the standard, and purchaser incentives for product that exceeds standards. Most of these motors have a useful life of over 20 years, so any efficient motors purchased in advance of the standards' effective date will yield benefits for many years to come.

Thank you for your consideration of these recommendations. We stand ready to meet with you and others to achieve these changes at the earliest possible time. Please do not hesitate to contact either of us if we can be of further assistance. Kyle Pitsor can be reached at (703) 841-3274, or kyl_pitsor@nema.org, and Neal Elliott can be reached at (202) 429-2248 x707, or rnelliott@aceee.org.

Sincerely,

Kyle Pitsor
Vice President – Government Relations
National Electrical Manufacturers
Association

Neal Elliott
Director, Industrial Program Director
American Council for an Energy-Efficient
Economy

cc: The Honorable Jeff Bingaman
The Honorable Pete V. Domenici