

DOCKETED	
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CALSSA Comments on Solar Heating for an Existing Pool and Spa

Additional submitted attachment is included below.



January 9, 2026

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA 95814

Re: CEC Docket No. 25-BSTD-03 - CALSSA Comments on Solar Heating for an Existing Pool and Spa

California Energy Commissioners and Staff:

The California Solar & Storage Association (CALSSA) appreciates the opportunity to provide comments on the proposed Title 24 Part 6 requirements for Solar Heating for an Existing Pool and Spa.

CALSSA supports the intent of the California Energy Commission (CEC) to update pool heating system requirements. However, we are concerned about the implications of Exception 5 to Section 110.4(c), which currently applies only to permanent spas with inadequate Solar Access Roof Area (SARA).

As proposed, Exception 5 would apply not only to pool alterations, but it would create a new exception for newly constructed pools as well. As such, the benefits of requiring non-residential pool alterations to install solar heating would be cancelled out if not taken at a loss if new pools were now allowed this exception.

Additionally, Section 110.4(c) Heating Source Sizing provides five separate compliance pathways for pool heating systems, including solar, heat pumps, or a combination of the two. Exception 5 would now exempt pools from the other four possible compliance pathways if the site has inadequate SARA. While inadequate SARA may make solar pool heating a less attractive choice, it does not preclude the project from being unable to comply via other compliance methods.

CALSSA suggests not to alter Exception 5 and keep it for spa applications only. Instead, the CEC should consider creating a new Exception 6 exclusively for alterations of existing heating systems where there is inadequate SARA *and* on a case-by-case basis where the local enforcing agency has determined compliance with this section is not feasible based on inadequate physical space for a new heat pump, required electrical or utility upgrades, or where there is evidence suitable to the local enforcement agency substantiating that the alterations required to install a heat pump would adversely impact the construction cost of the project.

Respectfully,

Dara Yung
Permitting Director
California Solar & Storage Association