

## DOCKETED

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# Review of CEC Staff Report 2015 Appliance Efficiency Pre-Rulemaking Docket Number 15-AAER-02



# Presenters

- Angelo Pugliese  
Chairman APSP-14 Committee
  
- Mike McCague  
Chairman International Hottub Association  
Technical Committee



# Discussion Topics

- CEC collaboration with APSP
- Exercise Spas
- Inflatable spas
- Energy Label

# CEC and APSP

- Title 20 includes Portable electric spas
- Portable spas tested on multiple occasions
- APSP & CEC drafted APSP-14 - 2011
  - Portable Electric Spa Energy Efficiency Standard
  - Included exercise spas
- APSP & CEC drafted APSP-14 – 2014
  - Added tighter energy limits for portable spas
  - Added labeling requirement

# What is an Exercise Spa?

- Large volume 1000 – 2500 gallon
- 87°F water max temperature – (some models)
- Exercise and physical therapy



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# Exercise Spa Energy Efficiency

- Title 20 did not call out exercise spas
- Few are listed and manufacturers confused
- How to list a dual temp unit?
- Test at 87F?
- Recommendation of CEC was to reference APSP-14 2014 Exercise Spa protocol and develop strong data base for review.
- Review database after 2 years and establish proper energy limit.



# Dual Temperature Exercise Spas

- Per APSP-14, a dual temp exercise spa is to be tested; spa @ 102F and exercise @ 87F
- List as single exercise spa or list and label the two sections separately?
- What is the CEC intent?



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# Energy Label Clarification

- Current – Intent to list “approved covers on label”

Based on testing with the spa manufacturer’s specified cover. This spa must be sold with this cover or a manufacturer’s approved equivalent.

Tested Cover Manufacturer:

Tested Cover Model:

**Power calculated based on standby testing @ 60°F. Actual values will vary based on use.**

**This Label Must Remain Adhered to Spa Until Point of Sale.**

- Proposed – Only list tested cover

This spa was tested with the spa manufacturer’s specified cover.

Tested Cover Manufacturer: xxx

Tested Cover Model: xxx

**Power calculated based on standby testing @ 60°F. Actual values will vary based on use.**

**This Label Must Remain Adhered to Spa Until Point of Sale.**



# APSP-14 Committee

## Exercise Spas Recommendations

- Request delay in implementation to allow CEC and APSP-14 committee time to review the requested change and jointly develop an energy savings program for Exercise Spas
- Follow CEC earlier recommendation to test per APSP-14 for exercise spas and list.
- Develop exercise spa specific test criteria after formal data review.

# Temporary Inflatable Spas



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# What are Temporary Inflatable Spas?

- Lightweight inflatable tub with an attached small control box containing the heater and circulation/filtration pump
- Packs into a bag and a retail shelf box of approximately 20"x20"x30" size
- Low level of investment: commonly retails between \$300 and \$600
- Easy transportation, setup, as well as disassembly and storage
- Simple 110V plug-'n-play installation: setup time including inflation approximately 15 minutes
- Temporary setup and use during warm months (spring, summer, early fall), usually set up for a few weeks at a time
- Easy disassembly and storage whenever non-operation is planned and during colder periods
- Relatively short product life expectancy of 3 years



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# Temporary Inflatable Spas vs. Rigid Portable Spas



Always Plug-'n-Play



Generally hard-wired



# Temporary Inflatable Spas vs. Rigid Portable Spas - Metrics

METRIC	TEMP. INFLATABLE SPA	PORTABLE SPA
Lifespan	3 years	10 years
Usage/standby	Temporary/seasonal	Permanent/year round
Weight	100 lb	1000 lb – 2000 lb
Delivery	Passenger car	Truck & Crane
Cost	\$300 - \$600	\$5,000 - \$12,000
Electrical	110V Plug-'n-Play	110V or generally 220V hardwire
Portability	Unlimited	Limited
Storability	Yes	No

# Temporary Inflatable Spas

## – Current Status

- Never considered within data collection and testing/evaluation by the CEC and APSP-14
- Current metrics do not apply to this product class due to its aforementioned characteristics that set them apart from other portable spas
  - Temporary setup and use with considerably shorter standby periods overall
  - Unlimited portability and storability allowing reduced idle times
  - Significantly shorter product life span
  - Different consumer and type of use: renters and lower disposable income consumer



# Temporary Inflatable Spas

## - Energy Saving Potential

- Short life and temporary nature uses less energy over product life than estimated.
- Low potential for annual energy savings with temporary inflatable spas as compared to Portable Spas
- Estimated sales for the year 2015 of temporary inflatable spas in California indicate approximately 15,000 consumers/families

# APSP-14 Committee

## Inflatable Spas Recommendations

- APSP-14 is evaluating temporary inflatable spas as a separate class of product from Portable Spas and Exercise Spas.
- Inflatable spas cannot meet the proposed energy limit
- The proposed language would eliminate inflatable spas from the market and lower income citizens from the possibility to enjoy a spa
- Request delay in implementation to allow CEC and APSP-14 committee time to review the requested change and jointly develop an energy savings program for Inflatable Spas