

## DOCKETED

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*Comment Received From: John Norwood*

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## **CPSA Comments Regarding Proposed Regulations**

*Additional submitted attachment is included below.*



February 29, 2016

California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

RE: Docket Number 15-AAER-02  
Pool Pump Motors and Portable Electric Spas

To Whom It May Concern:

On February 18, 2016 the California Energy Commission held a workshop regarding new pool pump and electric spa regulations. The California Pool and Spa Association (CPSA) would like to associate our comments with those of the Association of Pool and Spa Professionals (APSP) given during the workshop.

As noted in APSP's testimony during the workshop, the current annual energy use by PMSM storable pool pumps is insignificant (6.0 GWh). The proposed regulations require that these pumps be replaced with Capacitor Pumps, which would increase the annual energy use up to 160%. This increase in energy use will increase the cost to California consumers \$1,475,708 per year. This change will drastically increase energy consumption, which is in direct conflict to the proposed regulation's stated goal.

Therefore, CPSA argues that PMSM storable pool pumps should be exempted from the regulations.

CPSA also agrees with APSP that there should be a delay in the implementation of the proposed regulations regarding temporary inflatable spas. CEC and APSP-14 are evaluating temporary inflatable spas as a separate class of product from portable spas and exercise spas, given their differing characteristics. CPSA agrees with APSP that inflatable spas could not meet the proposed energy limit in the regulations and thus would be eliminated from the market. Inflatable spas are a cheaper option for lower income citizens and this regulation would eliminate this possibility for large sectors of Californians to enjoy a spa.

Therefore, CPSA argues that there should be a delay in implementation to allow the CEC and APSP-14 committee time to review the requested change and jointly develop an energy savings program for inflatable spas.

Should you have any questions or concerns regarding the comments herein, please contact the CPSA.

Thank you,

John Norwood

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