

DOCKETED

| | |
|-------------------------|--|
| Docket Number: | 15-AAER-02 |
| Project Title: | Pool Pumps and Spa Labeling |
| TN #: | 210555 |
| Document Title: | Jennifer Hatfield Comments: APSP- 14 Comments on Portable Spas for Docket No. 15-AAER-02 |
| Description: | N/A |
| Filer: | System |
| Organization: | Jennifer Hatfield |
| Submitter Role: | Public |
| Submission Date: | 2/29/2016 4:30:21 PM |
| Docketed Date: | 2/29/2016 |

Comment Received From: Jennifer Hatfield

Submitted On: 2/29/2016

Docket Number: 15-AAER-02

APSP-14 Comments on Portable Spas for Docket No. 15-AAER-02

Additional submitted attachment is included below.



2111 Eisenhower Avenue
Alexandria, VA 22314-4679

APSP.org

February 29, 2016

California Energy Commission
Docket No. 15-AAER-02
1516 9th Street, MS-4
Sacramento, CA 95814

To Whom It May Concern:

The following is submitted on behalf of the Association of Pool and Spa Professionals (APSP) and its APSP-14 American National Standard for Portable Electric Spa Energy Efficiency Committee, in response to the California Energy Commission (CEC) Staff report on the Analysis of Energy Efficiency for Pool Pumps and Motors, and Spas. Since 1983, APSP has been accredited by the American National Standards Institute (ANSI) as the Standards Development Organization for the nation's pool and spa standards and has been proactive in supporting energy efficiency through the adoption of the APSP-14 standard.

The APSP has made significant efforts over the years to cooperate with the CEC to meet their goals and objectives. When requested in the last round, we developed a new formula to achieve additional savings even though it would eliminate some spas from the market. In addition, we added exercise spas which were not considered in the initial Title 20. Many hours of discussion were held to achieve consensus both on exercise spas and covers. Anticipating reciprocity, APSP-14 was revised so that the CEC could reference the new standard, and allow spa manufacturers to comply with one standard. The following items are our specific concerns with the staff proposals related to spas:

Definitions:

It is not appropriate to use a brand name of a product in the definition of a class of products.

Recommendation: Remove Endless Pools from the Exercise Spa definition.

Exercise Spas:

These were not included in the original Title 20. While some data has been submitted to the CEC database, the number of exercise spas in the database is a small percentage and is not representative of the universe of exercise spas. The APSP felt that prior to mandating any cost savings, reliable data needed to be compiled to provide a base line. Time is needed for manufacturers to test and list their product to APSP-14 so that the energy limit can be adjusted appropriately. Also since some exercise spas cannot be set to 104 degrees F, it was felt that they should be tested and normalized to 87 degrees F as given in APSP-14.

Recommendation: Adopt APSP-14 as a whole and hold swim spas to the current

5V^{2/3} formula until enough data has been provided (2-years) for a reevaluation of the energy limit.

Dual Temperature Spas:

Regarding dual temperature units, they are in effect an exercise spa attached to a regular spa. These products are not specifically called out in APSP-14 and therefore they would have two separate tests, one for the exercise portion of the spa, and one for the spa portion. APSP-14 does not cover the issue of listing on the CEC database. Because the CEC database format is not sufficient to address the situation of two units on one platform, the separately tested portions should be also listed as separate units.

Recommendation: Per the CEC recommended adoption of APSP-14, test and evaluate the spa at 102F and the exercise spa at 87F per protocol. Apply (2) labels, (1) spa label and (1) exercise spa label with in proximity of each other on the combo unit. Report the two units to the CEC data base separately with the following nomenclature. XXX-A (spa portion) XXX-B (exercise spa portion)

Inflatable Spas:

Inflatable spas are a different class of product as compared to the traditional portable electric spa and exercise spa. Because they are made of common vinyl and not structurally supported, their life is expected to be 3 seasons. The life could be significantly shorter if left up and running year round because of their susceptibility to UV cracking damage of the vinyl as well as rips, tears, and punctures from use. These spas operate on a similar premise as conventional spas. They have a small filtration pump and heater. Water is filtered automatically on a determined schedule and the heater turns on as needed. They would have standby – keep ready – mode. Although these spas could be tested to the APSP-14 standard as written, they cannot meet that standard when tested to APSP-14 as they are today. The current energy limit and the proposed limit are simply too strict for this class of product as they are built and tested today.

Ongoing discussions with the Inflatable group has developed some options to lower the overall energy usage of these products. One option is to make the units default to a lower set temperature after a period of time. Standby would no longer be 102F but a lower temperature. This would result in significant savings when they are operated in a continuous manner rather than a weekend/temporary basis. If the units typically cool off and have longer periods between heat and filtration cycles, the test protocol would need to be modified to get accurate and reproducible test results and an alternate energy limit defined.

Recommendation: Conduct a full review of inflatable operation and life time characteristics. Schedule meetings with APSP-14 committee, Inflatable group, CEC, and other stakeholders to review the product further and define creative and effective means to lower the product class' overall energy level.

Covers:

There was much discussion on how to include cover data that would assist the consumer in making informed decisions not only on the initial purchase of the spa, but when in 3-5 years, the cover was replaced. There are several scenarios for how covers are mated with spas.

- A. Spa OEMs build or have contract built specific covers for their spas and ship the two together to the dealer/customer.
- B. Spa OEMs have contract built specific covers for their spas which are shipped separate from the spa to the dealer/customer.

- C. Spa OEMs specify 3rd party covers for use with their spas and recommend dealers buy those for sale to the customer.
- D. Spa OEMs build, contract build, or specify covers. Dealers opt not to buy those covers and source their own covers direct from cover manufacturers.
- E. Replacement covers: Customer returns to the dealer and purchases the recommended/specified cover.
- F. Replacement covers: Customer orders 3rd party cover direct from cover manufacturer.

Our cover reporting format was developed based on the reality of the spa market and a desire to provide useful information to the consumer. The sale of the spa in California to the end user is made by the dealer or retailer and the responsibility for selling the approved cover is at this point. The spa/exercise OEM is responsible for testing and listing the approved cover(s) for the unit. Alternate covers not tested/approved/listed by the OEM would not be allowed. Based on the discussion at the workshop, if the intent is to ensure that the approved cover is sold with the spa then the label should state that as shown in the APSP-14 label. Changing the label to only state "This spa was tested with the spa manufacturer's specified cover" does not require that the tested and listed cover be sold with the spa as desired. If the intent is to allow for the customer to pick alternate, and hopefully more efficient 3rd party covers, then the "equivalent" statement is needed as given in the current APSP-14 label. Therefore, the label contained in APSP-14 is less confusing and more consistent with the remainder of Title 20 as proposed.

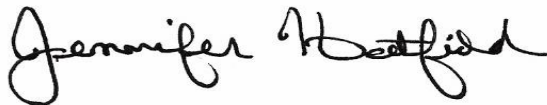
Recommendation: Adopt the APSP-14 label without change as presented in the standard.

Conclusion:

In the spirit of cooperation between the APSP and the CEC, we request that the CEC reference APSP-14 in its entirety for this round of savings. In the future when the CEC wishes to achieve additional savings, the APSP would be willing to again cooperate with the CEC to achieve their goals.

We thank the CEC for its time and consideration.

Respectfully submitted,



Jennifer Hatfield
Director, Government Affairs
(941) 345-3263
Jhatfield@apsp.org