

DOCKETED

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APSP 14 Additional Comments 3.21.16

Additional submitted attachment is included below.



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March 21, 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. This item was unintentionally left out of our initial February 29, 2016 response citing our specific concerns with the staff proposals related to spas and should be considered as an additional comment to that original submittal:

Separate exercise spa energy label requirement:

CEC requests that the exercise spas receive an energy label appropriate for their size and energy usage. The current spa label proposed and contained in APSP-14 has a range of 50 – 450 Watts. The issue of labeling exercise spas was addressed when they were added to the 2014 edition of the APSP-14 standard. A separate label is called out on page 6 figure 7.1(b) which is specific for exercise spas and has an energy range of 100 – 750 Watts. This label is consistent in design with the recommended APSP-14 spa label.

Recommendation: Adopt the exercise spa energy label in APSP-14 page 6, figure 7.1(b).

We thank the CEC for its time and consideration.

Respectfully submitted,

A handwritten signature in black ink that reads "Jennifer Hatfield". The signature is written in a cursive, flowing style.

Jennifer Hatfield
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