

## DOCKETED

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# Portable Electric Spas

CEC Staff Workshop

Developed by Energy Solutions  
on behalf of the California IOUs

August 3rd, 2017



# IOU Involvement in Spa Energy Efficiency

2004- IOUs propose CASE study for portable electric spas

2006- Performance standard for standby power takes effect

2008- Cal Poly study of portable electric spas verifies savings

**2012**- Current rulemaking begins, CEC asks for labeling proposal

# Current Title 20 Portable Electric Spa Standards

**Portable Electric Spas.** The normalized standby power, as defined in Section 1604(g)(2)(I), of portable electric spas manufactured on or after January 1, 2006, shall be not greater than  $5(V^{2/3})$  watts where  $V$  = the fill volume, in gallons.

# IOU Involvement in Current Rulemaking

July 29<sup>th</sup>, 2013- IOUs submit labeling proposal to CEC

January 2015<sup>th</sup> - CEC Public Meeting, asks for standards proposal in addition to labeling

April/ May 2014- IOUs engage with APSP-14 to negotiate label and updated standards level

May 15<sup>th</sup>, 2014- IOUs submits a CASE report to CEC reflecting industry consensus

September 12, 2014- APSP-14 creates their new standard “ANSI/APSP/ICC-14 2014” reflecting IOU/ industry consensus

February 18<sup>th</sup>, 2016- IOUs participated in CEC Staff workshop and submitted comments

July 13<sup>th</sup>, 2016- IOUs participated in CEC Staff workshop and submitted comments

# IOUs Support CEC Staff Proposal

IOUs support the CEC staff proposal (Alternative #3) and believe the proposed standards are cost-effective, achievable and will lead to significant savings statewide. (~155 GWh)

The CEC Staff proposal makes three important changes to the current Title 20 standards including:

1. Clarification of the definition of portable electric spas
2. An updated portable electric spa standby standard
3. Requiring a labels on all portable electric spas

# Definition of a Portable Electric Spa

## **Current T20 Definition:**

*“Portable electric spa” means a factory-built electric spa or hot tub, supplied with equipment for heating and circulating water.*

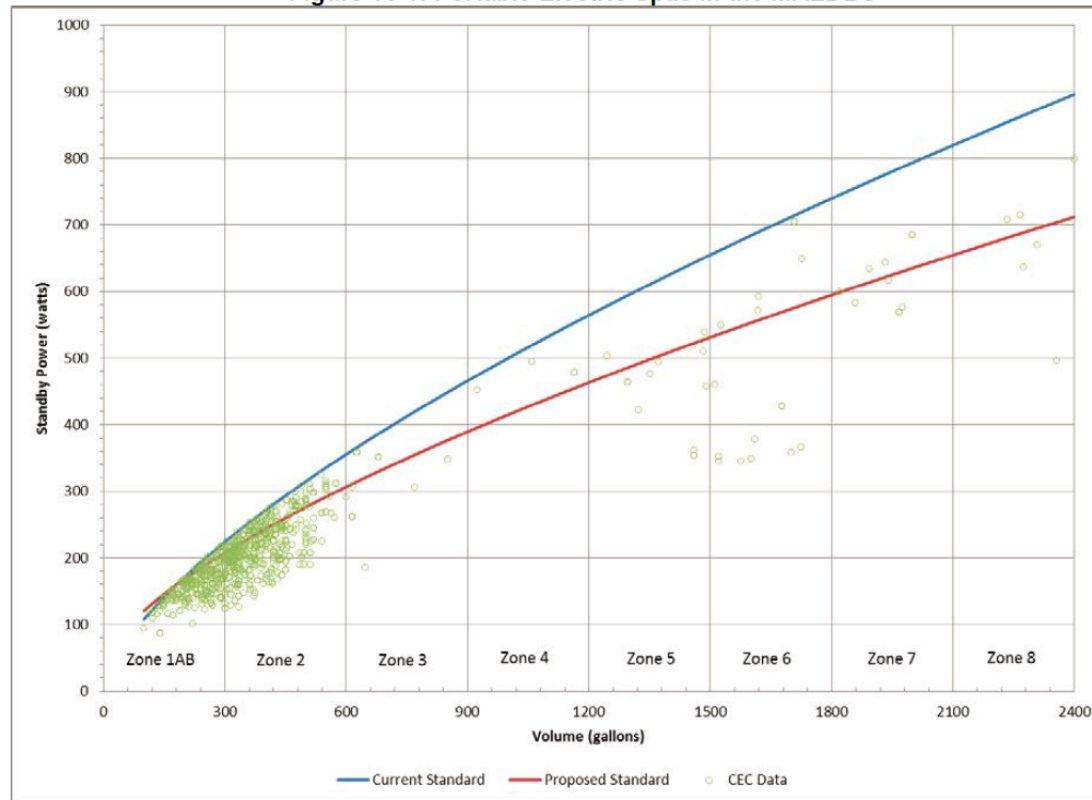
CEC Staff has clarified that this definition covers traditional, storable, exercise, and combination above-ground spas.

# Strengthening Standby Standards

IOUs support CEC's adoption of the APSP-14-2014 maximum allowable standby standard.

More than 75% of models in the CEC database will meet the proposed standard

Figure 16-1: Portable Electric Spas in the MAEDBS



Source: MAEDBS, California Energy Commission



# IOUs Originally Proposed Two Labels Designs

### Electric Spa Energy Guide

Make: XXX      Model: XXX      Volume: 300 gallons

Standby Power*	<b>150</b> watts
Maximum Allowable Standby Power	224 watts
Yearly Standby Energy Costs	<b>\$210</b>
Based on year-round operation and 16 ¢/ kWh	

**Performance compared to CA Spa Standards**

CA 2006 Standard      25%      50%      Most Efficient →

33%

This spa uses **33%** less standby energy than required by California's Title 20 Appliance Standards

\*For non-swim spas, Standby Power refers to the power consumed while spa is not in use (cover is on), heated to 100F and the jets, lights, audio etc. are off. For more information see <http://www.energy.ca.gov/appliances/>

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

### Electric Spa Energy Guide

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Standby Power*	<b>150</b> watts
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**Energy Efficiency Performance**

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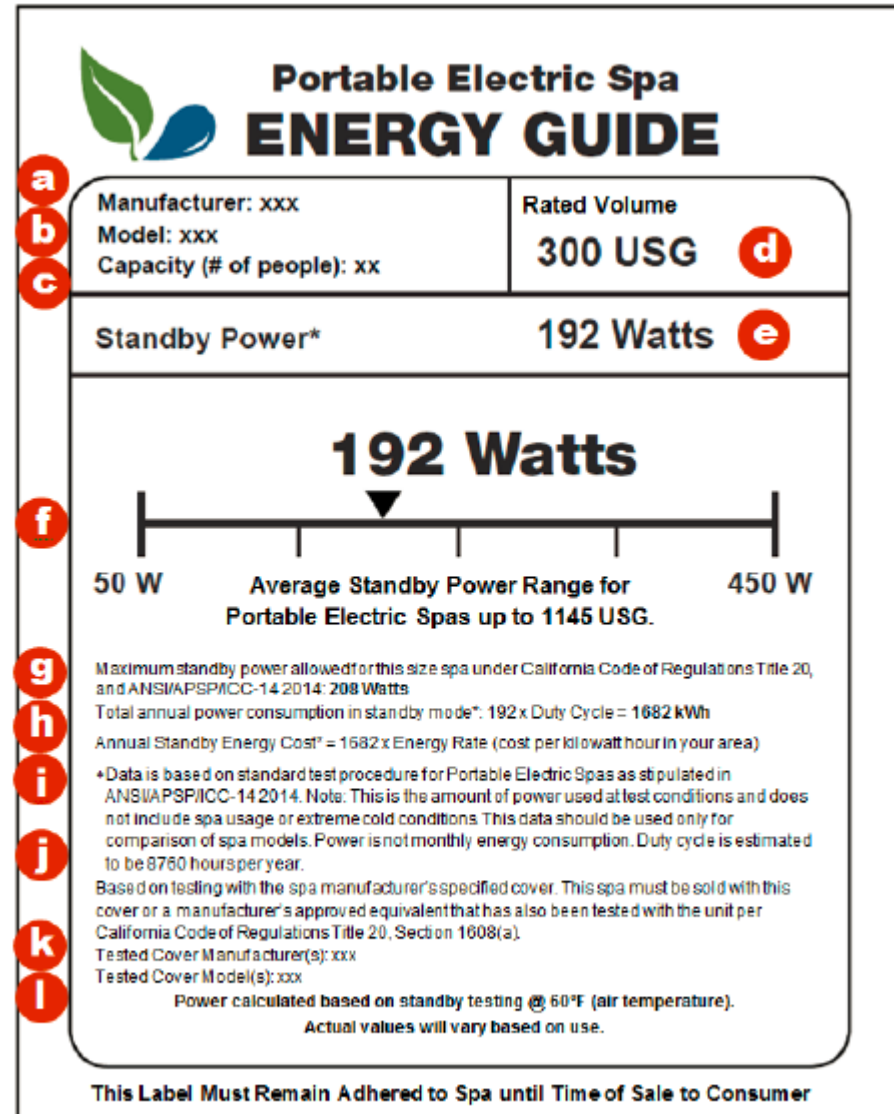
This Label Must Remain Adhered to Spa Until Point of Sale.

# Spa Label

CEC staff proposed to adopt APSP/ IOU consensus label.

IOUs broadly support this label design and concept as it will provide valuable information to consumers.

Figure 14-1: Label Design



Source: Modified from Figure 7.2 in ANSI/APSP/ICC-14 2014

# Suggestions for Improvement

The CA IOUs support the staff proposal and look forward to the formal rulemaking process.