

DOCKETED

Docket Number:	15-AAER-02
Project Title:	Pool Pumps and Spa Labeling
TN #:	220639
Document Title:	Doug Wyatt Comments Definition of Portable Electric Spa related to Swim Spas
Description:	N/A
Filer:	System
Organization:	Doug Wyatt
Submitter Role:	Public
Submission Date:	8/10/2017 5:46:31 AM
Docketed Date:	8/10/2017

Comment Received From: Doug Wyatt

Submitted On: 8/10/2017

Docket Number: 15-AAER-02

Definition of Portable Electric Spa related to Swim Spas

My comments are related to the definition of a "Portable Electric Spa" and how this relates to Swim Spas which are a cross between a spa and a pool. The intent of a swim spa is to provide a large body of water that can be heated to a comfortable water temperature so that the swimmer does not need to battle with the elements of cold water or having to keep turning around in a pool once they reach the end of the pool.

So to expect a user to swim in 102 degree F water is not realistic as it would promote the onset of hyperthermia due to the fact of the user exercising in an extreme condition. From what I understand, the classification for pools evaluates them at a water temperature of 80 degrees F which is more representative of what is generally practised.

So to expect a swimspa to be evaluated to the standards of a spa does not make sense as each unit has a different purpose where a spa is intended for immersion of persons in heated water. Given the large body of water and trying to maintain a temperature of 102 F with an ambient air temperature of 60F provides too great a delta to achieve an energy efficient system. Not to say that it is not a bad idea to try your best to achieve this goal as a target but i think there needs to be a revision to the standard to have swim spas evaluated at a water temperature of 80 degrees like a pool with an ambient air temperature of 60F.