

DOCKETED

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Comment Received From: The Association of Pool & Spa Professionals

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on CEC Inflatable Spa Proposal

Additional submitted attachment is included below.

September 1, 2017

Submitted Electronically: docket@energy.ca.gov

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 15-AAER-02
1516 9th Street
Sacramento, CA 95814-5512

To Whom It May Concern:

The Association of Pool & Spa Professionals (APSP) and its spa/hot tub segment have been proactive over the years in supporting energy efficiency through the adoption of the APSP-14, American National Standard for Portable Spa Energy Efficiency and its work with the California Investor Owned Utilities (CAIOU's) in supporting Title 20 and the update of this regulation. On behalf of our inflatable spa segment, the APSP submitted comments in August 2016 noting our concern that it was impossible for an inflatable spa to reach the same energy efficiency standards that were set for portable spas, thereby effectively banning this affordable product. Instead, it was suggested the CEC considered the creation of a separate definition and energy efficiency requirement for Inflatable Spas.

APSP proposed to the CEC the following:

1. Create a separate category within the Title 20 definitions in which a unique efficiency standard is applied to inflatable spa products.
2. Allow immediate relief from meeting the efficiency standards for inflatable spas within Title 20 in order to cease the illegal status of the products in the California market.
3. Set higher efficiency goals for the inflatable spa category to go into effect upon final implementation of the current draft rule.

Proposed definition previously provided as follows:

A portable electric spa that is free-standing and which contains an inflatable main structure that forms the vessel for the heated water and which is capable of being deflated for storage. Inflatable spas are not designed or intended to be permanently installed in the ground and are supplied with cord-connected 110 volt equipment packages that integrate pumps, heaters, and blowers and or jets for heating, circulation, filtration, and maintenance.

Therefore, as noted in the PowerPoint presentation given at the August 3, 2017 workshop, the APSP respectfully reiterates its recommendation to the CEC that a separate category be established for this type of spa along with reasonably achievable, yet still aggressive, energy efficiency goals. The inflatable

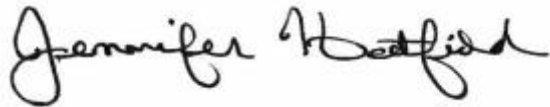
spa industry has made a significant improvement over the past 12 months in efficiency that serves to increase the overall affordability of the product for all Californians, not just for those with significant means.

The APSP has a long history of working with regulators and energy advocates on higher efficiency standards – you will not find another industry group more supportive of efforts to increase energy efficiency standards in the pool and spa industry. The proposal put forward via both our August 2016 comments and the more recent PowerPoint delivered at the August 3 workshop, strikes a balance by offering a more energy efficient product while keeping the product itself low cost and user friendly.

We look forward to working with all parties to deliver an effective set of efficiency standards for the inflatable spa product and align such regulations to ensure all consumers have access to ALL spa type products while realizing the maximum energy efficiency benefits. To that end, APSP respectfully requests that the CEC consider our comments herein today as well as any comments provided by our member companies.

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 style with a large initial "J".

Jennifer Hatfield
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