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| <b>Docket Number:</b>   | 18-AAER-02  |
| <b>Project Title:</b>   | Appliance Efficiency Standards Rulemaking for Portable Electric Spas and Battery Charger Systems                      |
| <b>TN #:</b>            | 222994  |
| <b>Document Title:</b>  | California Investor Owned Utilities Comments CA IOUs Title 20 Response to 45-Day Language Regulations_ Spas 3-19-2018 |
| <b>Description:</b>     | N/A   |
| <b>Filer:</b>           | System  |
| <b>Organization:</b>    | California Investor Owned Utilities   |
| <b>Submitter Role:</b>  | Public  |
| <b>Submission Date:</b> | 3/19/2018 9:29:33 AM  |
| <b>Docketed Date:</b>   | 3/19/2018   |

*Comment Received From: California Investor Owned Utilities*

*Submitted On: 3/19/2018*

*Docket Number: 18-AAER-02*

**CA IOUs Title 20 Response to 45-Day Language Regulations\_ Spas 3-19-2018**

*Additional submitted attachment is included below.*

# Portable Electric Spas

Codes and Standards Enhancement (CASE) Initiative  
Title 20 Standards Development

Comments regarding Final Staff Report and 45-Day Language on:  
**Portable Electric Spas**

Docket # 18-AAER-02

Prepared for:

March 19, 2018



PACIFIC GAS & ELECTRIC  
COMPANY



SOUTHERN CALIFORNIA  
EDISON



SAN DIEGO GAS AND  
ELECTRIC



SOUTHERN CALIFORNIA  
GAS COMPANY

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This report was prepared by the California Statewide Utility Codes and Standards Program and funded by the California utility customers under the auspices of the California Public Utilities Commission.

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## 1. Purpose

The Codes and Standards Enhancement (CASE) initiative presents recommendations to support California Energy Commission's (Energy Commission) efforts to update California's Appliance Efficiency Regulations (Title 20) to include new requirements or to upgrade existing requirements for various technologies. The four California Investor Owned Utilities (IOUs) – Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric (SDG&E), Southern California Edison (SCE), and SoCalGas® – sponsored this effort (herein referred to as the CA IOUs). The program goal is to prepare and submit proposals that will result in cost-effective enhancements to improve the energy and water efficiency of various products sold in California.

## 2. Background

The CA IOUs have been involved with spa energy efficiency for over 15 years. In 2006, the Energy Commission adopted a first-in-the-nation maximum allowable standby power standard for portable electric spas as proposed by the CA IOUs. Since then, these standards have been adopted in Arizona, Washington, Oregon, and Connecticut.

In 2012, the Energy Commission initiated a pre-rulemaking to update the portable electric spa standards. The CA IOUs have been involved in each step of the process, including the submission of two CASE Reports on portable electric spa test procedures, standards, labeling, and reporting requirements.<sup>12</sup> On March 6, 2018, the CA IOUs attended the Energy Commission public staff workshop, and presented on several items in the staff report, following the release of 45-Day Language. These items and recommendations for improvement are discussed in greater detail in the comments below.

## 3. Summary of CA IOU Support of 45-Day Language

The CA IOUs are broadly supportive of the Energy Commission final staff report and 45-Day Language for portable electric spas. The CA IOUs would especially like to commend the Energy Commission for working with manufacturers to develop a new, aggressive, but achievable efficiency standard level for inflatable portable electric spas. Collectively, the proposed standards are cost-effective and achievable, and will lead to significant energy savings throughout California, at roughly 242 gigawatt hours per year after stock turnover.

For portable electric spas, the Energy Commission's 45-Day Language and final staff report:

1. Clarifies the definitions of portable electric spas to include standard, inflatable, exercise, and combination spas;
2. Updates the portable electric spa maximum allowable standby power standard;
3. Creates a new maximum allowable standby power standard for inflatable portable electric spas; and

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<sup>1</sup> [http://www.energy.ca.gov/appliances/2013rulemaking/documents/proposals/12-AAER-2F\\_Residential\\_Pool\\_Pumps\\_and\\_Replacement\\_Motors/California\\_IOUs\\_Response\\_to\\_the\\_Invitation\\_to\\_Submit\\_Proposals\\_for\\_Pool\\_and\\_Spas\\_2013-07-29\\_TN-71756.pdf](http://www.energy.ca.gov/appliances/2013rulemaking/documents/proposals/12-AAER-2F_Residential_Pool_Pumps_and_Replacement_Motors/California_IOUs_Response_to_the_Invitation_to_Submit_Proposals_for_Pool_and_Spas_2013-07-29_TN-71756.pdf)

<sup>2</sup> [http://www.energy.ca.gov/appliances/2013rulemaking/documents/12-AAER-2G/comments/Portable\\_Electric\\_Spas\\_Final\\_CASE\\_Report\\_12-AAER-2G\\_2014-05-15\\_TN-73027.pdf](http://www.energy.ca.gov/appliances/2013rulemaking/documents/12-AAER-2G/comments/Portable_Electric_Spas_Final_CASE_Report_12-AAER-2G_2014-05-15_TN-73027.pdf)

4. Requires a customer-facing energy label on all portable electric spas.

The CA IOUs commend the Energy Commission staff for their thoughtful and thorough proposal; and to improve the portable electric spas final staff report and 45-Day Language, the CA IOUs recommend that the Energy Commission consider the following modifications.

## 4. Specific Recommendations on Portable Electric Spas

### 4.1 Label location

To realize the energy savings of the proposed label for portable electric spas, the CA IOUs recommend the Energy Commission consider adding language to ensure the visibility of the label to customers. Specifically, for Standard, Exercise, and Combination spas, we recommend further direction to manufacturers be provided regarding the location of the label. The current language states that the label shall only be “marked by the manufacturer in a readily visible location on the shell or front skirt panel.” We encourage the Energy Commission to modify the language to require the label be only placed on the shell of the spa, not the skirt of the spa. As shown below in Figure 1, spas on showroom floors are often crowded with most sides (skirts) of the spa being adjoined with another spa, or positioned near a wall. Requiring the label be on the shell ensures the label will be visible regardless of showroom floor display arrangement.



**Figure 1: Spa show room floor.**

Image: <https://www.youtube.com/watch?v=3fvE8tXC2Gw>

The CA IOUs also encourage additional language to require the top of the label be no more than six inches from the top of the spa, and be vertically oriented. We believe providing high-level guidance regarding label location will ensure the labels are uniformly placed across products from different manufacturers, and always remain in a readable orientation and location for customers.

For inflatable, portable electric spas, the CA IOUs recommend the Energy Commission require the label to be placed on the box, instead of the shell, as these units are sold collapsed (in boxes as shown in Figure 2) and inflated on-site. Currently, the recommended language that places the label on the shell of the spa portable electric spas will prevent the label from achieving its desired effect of being visible by the customer at the time of sale.



**Figure 2: Inflatable, portable electric spa in a box.**

Source: <https://www.spasandstuff.com/alpine-portable-inflatable-hot-tub.html>

## 4.2 Other Recommendations

See below for other minor recommendations:

- The CA IOUs encourage the Energy Commission to change the reference on the label from “USG” to “US Gal” for better clarity and readability to customers.
- The CA IOUs recommend the Energy Commission allow multiple spa covers (which comply with the standard) to be listed on each label. The standby power draw displayed on the label should reflect the spa and cover combination with the highest energy usage. This cover should be marked or highlighted (e.g., check-box) on the label to indicate to customers which spa cover aligns with the label’s indicated energy use.
- The Energy Commission’s proposal requires the reporting of minimum and maximum water temperature settings in the test report. The CA IOUs believe this information is useful and encourage the Energy Commission to further add these data fields to Table X so that it can be reported publicly.