

## DOCKETED

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**CA IOUs Title 20 Response to 15-Day Language Regulations\_ Spas 4-6-2018**

*Additional submitted attachment is included below.*

# Portable Electric Spas

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

Comments regarding 15-Day Language on:  
**Portable Electric Spas**

Docket # 18-AAER-02

Prepared for:

April 6, 2018



PACIFIC GAS & ELECTRIC  
COMPANY



SOUTHERN CALIFORNIA  
EDISON



SAN DIEGO GAS AND  
ELECTRIC



SOUTHERN CALIFORNIA  
GAS COMPANY

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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 spas, which contain test procedures, standards, labeling, and reporting requirements.<sup>1,2</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. The CA IOUs submitted written comments, and further engaged with industry and the Energy Commission staff on remaining issues.

## 3. Summary of CA IOU Support of 15-Day Language

The CA IOUs are supportive of the Energy Commission final staff report and 15-Day Language for 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 15-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
4. Requires a customer-facing energy label on all portable electric spas.

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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)

The CA IOUs commend Energy Commission staff for their thoughtful and thorough proposal, and for incorporating suggestions on the 45-Day Language from the CA IOUs to improve the portable electric spas final 15-Day Language. This includes improvements to the label location and visibility requirements on portable electric spas, and for ensuring that spa covers be marked (with a check-box) on the energy label to indicate to customers which spa cover aligns with the label's indicated energy use.

The CA IOUs again commend the Energy Commission on this multi-year long effort, and look forward to working with the Energy Commission to further advance portable electric spa energy efficiency in the future.