

**DOCKETED**

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## **CA Investor Owned Utilities - Support for Portable Elec Spa Updates**

*Additional submitted attachment is included below.*

# Portable Electric Spas

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

Joint Comments Supporting the Proposal for  
Proposed Test Procedure and Labeling  
Requirements for Portable Electric Spas

Docket Number: 20-AAER-04

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Prepared for:



Prepared by:

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## 1. Purpose

The Codes and Standards Enhancement (CASE) initiative supports the California Energy Commission's (Energy Commission) efforts to update California's Appliance Efficiency Regulations (Title 20). The three California Investor-Owned Utilities (IOUs) –Pacific Gas and Electric Company (PG&E), Southern California Edison (SCE), and San Diego Gas and Electric (SDG&E)– sponsor this effort (herein referred to as the CA IOUs).

The CA IOUs represent some of the largest utility companies in the Western U.S., serving over 32 million customers. As energy companies, we understand the potential of appliance efficiency standards to cut costs and reduce consumption while maintaining or increasing consumer utility of products. We have a responsibility to our customers to advocate for standards that accurately reflect the climate and conditions of our respective service areas, so as to maximize these positive effects.

We appreciate this opportunity to provide input on the proposed amendments to the regulations for portable electric spas in the Appliance Efficiency Regulations.

## 2. Background

The CA IOUs have been involved with spa energy efficiency for over 15 years, including developing a first-in-the-nation maximum allowable standby power standard proposal for portable electric spas, which the Energy Commission adopted in 2006. We remain committed to supporting the CEC in establishing standards that achieve measurable energy efficiency improvements.

## 3. CA IOU Support for the Proposed Amendments

In reviewing the proposed regulation amendments to incorporate, by reference the American National Standards Institute / Pool and Hot Tub Alliance (ANSI/PHTA) 14-2019 Standard, we confirmed that only structural changes occurred, where the PHTA standards committee incorporated provisions first developed by the Appliance Efficiency Regulations for testing combination, exercise, and inflatable spas in California to the previous PHTA 14-2014 Standard. Our appliance standards technology experts paid particular attention to potential inconsistencies and loopholes that could complicate compliance or undermine efforts to reduce energy consumption. We have duly reviewed the proposed changes and found that, whereas the proposed updates are structural and do not affect the standards levels or methodologies themselves, we have no reason to oppose them or have concerns on unintended implications of the new code language.

Furthermore, we commend the CEC for working to simplify the structure of the existing regulations and align them with industry standards. The proposed amendments will eliminate product exceptions and inconsistencies, thereby reducing market confusion and lower barriers to compliance.

In conclusion, the CA IOUs would like to reiterate our support of the CEC's proposal to update the Proposed Test Procedure and Labeling Requirements for Portable Electric Spas. We thank the CEC for the opportunity to be involved in this process.