

DOCKETED

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Comment Received From: Pool & Hot Tub Alliance (PHTA)
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Supplemental Comment

Additional submitted attachment is included below.



May 5, 2023

Submitted via: [Docket Log 23-FDAS-01](#)

Commissioner J. Andrew McAllister, Ph.D.
California Energy Commission
Dockets Office, MS-4
1516 9th Street
Sacramento, CA 95814

Re: Supplemental Comments on Pool Controls Rulemaking, Docket # 23-FDAS-01

Dear Commissioner McAllister and Commission Staff:

On April 10, 2023, the Pool & Hot Tub Alliance (PHTA) submitted comments on behalf of our member companies, including companies that manufacture pool pump controls and as well as controls for other pool equipment. This PHTA supplemental comment being submitted today, provides additional information as it relates to the proposed connectivity requirements in the flexible demand response pool control rulemaking. This information is being provided in response to other comments that were submitted and to ensure all considerations related to connectivity options are carefully considered by the California Energy Commission (CEC).

Connectivity

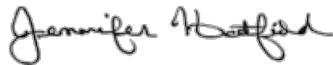
PHTA strongly supports and encourages the CEC to keep connectivity means in this rulemaking flexible to provide manufacturers options on how compliance can occur and allow for future innovation. It has been suggested that the rule should require a CTA-2045 communication port; however, specific to pool controls, this is problematic. Unlike a water heater, pool equipment is installed outdoors, and we are not aware of any weatherproof CTA-2045 port on the market.

Mandating any specific type of connectivity means will limit future technology. However, an external hardware device such as a CTA-2045 port can be an option that a manufacturer may choose. This would allow future considerations and research to determine, for example, if a weatherproof CTA-2045 port can be developed. If the CEC were to require only a CTA-2045 port, the length of time required for the research and product development would drastically increase the amount of time needed before manufacturers could possibly attempt to comply. Whereas manufacturers of connected products on the market today already have some sort of API infrastructure in place, which will make the transition less time

consuming (although as our previous comments stated, additional time from what is currently proposed is needed to comply with the current proposed requirements).

PHTA welcomes your careful consideration of these additional comments and looks forward to continuing to participate in this rulemaking. If you have any questions, please contact me at jen@jhatfieldandassociates.com on behalf of PHTA.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Hatfield". The signature is written in a cursive, flowing style.

Jennifer Hatfield
Government Affairs Consultant
Pool & Hot Tub Alliance

cc: Justin Wiley, PHTA VP of GR, Standards and Codes, jwiley@phta.org