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**PHTA CPSA Round 2 Comments on Pool and Spa Updates to 2025 Energy Code**

*Additional submitted attachment is included below.*



Submitted via email  
June 20, 2023

On behalf of the Pool and Hot Tub Alliance (PHTA) and California Pool and Spa Association (CPSA), we would like to submit the following comments in response to pool and spa-related proposals for the 2025 California Energy Code cycle.

### **Section 100.1**

Propose the following edit due to redundant language:

**POOL HEATER, COMMERCIAL** is a pool heater that is not a consumer appliance and is not designed for use with residential pools, is marketed as a commercial equipment ~~containing~~, contains design modifications related to safety and high volume flow, and is matched with a pump from the point of manufacture to accommodate the needs of public pools.

In addition, we recognize that “matched with a pump” comes directly from the US Department of Energy’s definition; however, we request clarification as to what exactly this means. Does this require specification of the type of pump be included in the pool heater manufacturer’s literature or that they provide the pump itself? It would be beneficial if this clarity can be provided in some form.

Propose adding the following definition from the International Swimming Pool & Spa Code (ISPSC) in order to recognize this type of common backyard spa from a portable electric spa or swimming pool:

**PERMANENT RESIDENTIAL SPA** is a spa, intended for use that is accessory to a residential setting and available to the household and its guests and where the water heating and water-circulating equipment is not an integral part of the product. The spa is intended as a permanent plumbing fixture and not intended to be moved.

### **Section 110.4**

(a)3. Instructions: additional clarification is needed to understand what is meant by “**proper care of pool, spa, or pool and spa combination water when a cover is used**”. We are unsure if a word is missing or should be replaced that would provided the needed clarity. If that is not the case, it is unclear as written what is the intended requirement. Is the intent to require instructions for the proper care of the heater when a pool cover is used or to require instructions on water quality when a cover is used? The latter appears outside the scope of a pool heater manufacturer’s instructions. Further, what standard or guidance is to be used and considered as “proper care”?

(a)4. Electric Resistance Heating: the code should clarify that electric resistance systems are permissible as backups to a solar water or heat pump pool heater, to supplement either or both, as the primary heater. This would be less confusing than stating they are not allowed and then listing exceptions. In the case of a consumer who chooses to install a solar pool heater but days of little to no sun prevent appropriate heating, a backup system should be allowed to be installed.

(b)1. Table 110.4-A: suggest under the ICC/APSP 902/SRCC 400 standard a footnote or astrick be added to recognize that PHTA is formerly APSP.

(b)2. Piping: the 36 inches of piping required for future solar heating is more than is necessary, and is inconsistent with section 5.4.3 of the ANSI/PHTA/ICC-15 2021 Standard for Residential Swimming Pool and Spa Energy Efficiency. We suggest the following edits for consistency with the ANSI standard:


**Piping.** At least ~~18~~ 36 inches of horizontal or vertical pipe shall be installed between the filter and the heater or dedicated suction and return lines, or built-in or built-up connections shall be installed to allow for the future addition of solar heating equipment;

(c) Heat Source Sizing:

- (c)1. appears to have left out the word “pool”. In addition to that fix, a third exception at the end of this subsection should be considered for permanent residential spas, as the sizing for solar collectors is not applicable when heating only a permanent residential spa. Users of a permanent residential spa expect rapid heating for what is typically evening use, when solar is not available.  
Exception 3 to Section 110.4(c): Heating systems used exclusively for permanent residential spa applications.
- (c)3. It is unclear how a user would demonstrate compliance with the percent of onsite renewable energy or site recovered energy required if solar collectors or heat pumps are not the primary heat source. How would this be verified and enforced?

Thank you for your time in reviewing our feedback and look forward to the next steps in the code cycle.

Respectfully,



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