

**DOCKETED**

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*Comment Received From: Pool & Hot Tub Alliance  
Submitted On: 7/3/2024  
Docket Number: 24-FDAS-02*

## **PHTA Comments to RFI**

*Additional submitted attachment is included below.*



July 3, 2024

Submitted via: [Docket Log 24-FDAS-02](#)

California Energy Commission  
Docket Unit  
715 P Street  
Sacramento, CA 95814

Re: RFI on Expanding Flexible Demand in California through Statewide MIDAS Data  
Delivery: A Comparison of Signaling Options, Docket 24-FDAS-02

Dear Commission and Staff:

The Pool & Hot Tub Alliance (PHTA) represents more than 4,000 company members and over 11,000 individual members nationwide that range from swimming pool, hot tub, and spa manufacturers, distributors, manufacturers' agents, designers, builders, installers, suppliers, retailers, and service professionals. The U.S. swimming pool and hot tub industry contributes about \$50 billion and almost 445,000 job equivalents to the U.S. economy.

PHTA welcomes the opportunity to provide comments on behalf of our member companies. If you have any questions, please contact me at [jen@jhatfieldandassociates.com](mailto: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](mailto:jwiley@phta.org)

PHTA wants to reiterate comments we made on connectivity during the pool control flexible demand rulemaking. We strongly support and encourage the CEC to keep connectivity means flexible to provide manufacturers options on how compliance can occur and allow for future innovation. We also want to emphasize that if any changes from the pool control rulemaking's communication requirements were to now occur, it would eliminate the ability for manufacturers to meet the compliance deadline of September 29, 2025. Further, doing so would cause an undue burden on manufacturers who are already working diligently to meet the current pool control requirements by the compliance date.

#### Radio Broadcast Data System Receivers

Under the pool control rulemaking it was determined not to include FM connectivity. Currently, no pool industry manufacturer produces products with a radio broadcast data system receiver. Considering the industry has not even attempted such a design, there may be many technical pitfalls and difficulties that would have to be overcome or that may simply not work with current products. Initial assessments have concluded that there are possible security and validation concerns with such a requirement, for instance. Further there are a lot of unknowns regarding reliability and good communication when using a radio broadcast data system receiver.

Our preliminary evaluation is FM is not a practical application for pool control products, but even if it is found to be technically feasible, the time and costs to redesign all current products have previously been underestimated. If it is something the Commission wants to consider in the future, we would request time for a thorough discussion to determine if this would be a practical application for pool controls or not, prior to making it a future requirement.

#### CTA-2045 communication port

A CTA-2045 communication port has also been discussed; 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. However, an external hardware device such as a CTA-2045 port could 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.

#### Conclusion

Mandating any specific type of connectivity means will limit future technology. If the CEC were to require only one means, and it were different from what is currently provided for under the pool controls rule, 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 is making the current September 2025 deadline more realistic, although still difficult.