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Commissioner Andrew McAllister
California Energy Commission (CEC)
Docket Unit, MS-4
715 P Street
Sacramento, California 95814

September 3, 2024

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

RE: Pool/spa heating comments on 15-day language for 2025 CALGreen Standard

Commissioner McAllister and California Energy Commission Staff:

The Pool & Hot Tub Alliance (PHTA) represents more than 4,000 company members and over 11,000 individual members nationwide, including companies that manufacture pool and spa heating equipment. PHTA has a long history of working with the California Energy Commission (Commission or CEC) and appreciates the opportunity to provide feedback on the current proposed language.

The California Pool & Spa Association (CPSA) is the statewide trade association that represents more than 230 company members in the state of California, including pool and spa builders, service companies, manufacturers, and distributors.

PHTA and CPSA thank the Commission for their attention to the comments both associations submitted July 1, 2024, on the CALGreen 45-Day Express Terms issued May 16, 2024. The Commission has followed through on those comments and responded to the changes suggested in them. We appreciate the opportunity to provide information that will benefit California's economy and environment and meet the needs of the many California swimming pool and spa owners, builders, and designers.

PHTA and CPSA submit the following comments on the Commission's 15-Day Express Terms for 2025 California Green Building Code, Title 24, Part 11 (CALGreen), Appendices A4.2 & A5.2.

Heat Source Sizing Requirements

A minor error listing sizing requirement options appears in two sections of the 15-Day Express Terms. This error may be corrected during editorial review, but as it affects pool heating requirement options, PHTA and CPSA thought it important to point out.

In section *A4.204.1.2 Altered Pool and/or Spa Heating for Existing Multifamily Buildings*, the following requirements are provided (**highlight** added by PHTA/CPSA for emphasis and clarity):

"A4.204.1.2 Altered Pool and/or Spa Heating for Existing Multifamily Buildings. Alteration of existing multifamily pool and/or spa heating system shall meet the following.

Heating Source Sizing. Heating systems or equipment for pool and/or spa shall meet the sizing requirements of 1, 2, or 3 below."

There are five options that follow this section.

Similar language appears in *A5.204.1.1 Altered Pool and/or Spa Heating for Existing Nonresidential Buildings*.

“A5.204.1.1 Altered Pool and/or Spa Heating for Existing Nonresidential Buildings.
Alteration of existing nonresidential pool and/or spa heating system shall meet the following.

Heating Source Sizing. Heating systems, or equipment for pool or spa, shall meet the sizing requirements of 1, 2, or 3 below.”

Again, five options follow this section.

PHTA and CPSA suggest that the intended language in the highlighted portions of these sections is “1 through 5 below.” The existing language unintentionally removes two important energy-saving options for builders, designers, and owners of pools.

Heat Pump Controls Section References

A minor error in referenced sections for Heat Pump Pool Heater (HPPH) requirements appears in similarly worded sections in both *A4.204.1.2 Altered Pool and/or Spa Heating for Existing Multifamily Buildings* and *A5.204.1.1 Altered Pool and/or Spa Heating for Existing Nonresidential Buildings*.

In the *Heating Source Sizing* sections that appear under both *A4.204.1.2* and *A5.204.1.1* and that provide the options presented in the previous comment, there is a reference in option 2 in both sections to Heat Pump Pool Heater (HPPH) control requirements. That reference is to **Title 24, Part 6, Section 110.2(d)** in both sections.

Section 110.2 provides *Mandatory Requirements for Space-Conditioning Equipment*, with the specific section referenced, 110.2(d), addressing *Gas-fired and oil-fired furnace standby loss controls* for space heating.

The referenced section for HPPH control requirements should be Title 24, Part 6, Section 110.4(d) *Controls for Heat Pump Pool Heaters with Supplementary Heating*. Correcting this reference will help avoid frustration and confusion among swimming pool and spa designers, builders, and owners who are working to comply with the revised requirements in Title 24, Part 11.

We welcome your careful consideration of the comments we have provided to the pool and spa-related proposals for the 2025 California Green Building Code (CALGreen), Title 24, Part 11. If you have any questions on these comments, please contact me at gceton@phta.org on behalf of PHTA.

Sincerely,



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