DOCKETED		
Docket Number:	15-AAER-02	
Project Title:	Pool Pumps and Spa Labeling	
<b>TN #:</b>	210390	
<b>Document Title:</b>	Portable Electric Spa APSP Staff Workshop Slides	
<b>Description:</b>	N/A	
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Organization:	APSP	
Submitter Role:	Public	
Submission Date:	2/17/2016 4:37:25 PM	
Docketed Date:	2/17/2016	



### Review of CEC Staff Report 2015 Appliance Efficiency Pre-Rulemaking Docket Number 15-AAER-02





- Angelo Pugliese
  Chairman APSP-14 Committee
- Mike McCague Chairman International Hottub Association Technical Committee





- CEC collaboration with APSP
- Exercise Spas
- Inflatable spas
- Energy Label





- Title 20 includes Portable electric spas
- Portable spas tested on multiple occasions
- APSP & CEC drafted APSP-14 2011
  - Portable Electric Spa Energy Efficiency Standard
  - Included exercise spas
- APSP & CEC drafted APSP-14 2014
  - Added tighter energy limits for portable spas
  - Added labeling requirement

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## What is an Exercise Spa?

- Large volume 1000 2500 gallon
- 87°F water max temperature (some models)
- Exercise and physical therapy



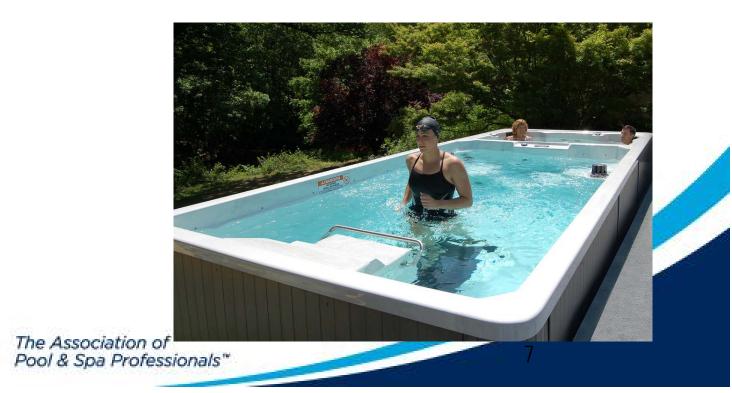
## Exercise Spa Energy Efficiency

- Title 20 did not call out exercise spas
- Few are listed and manufacturers confused
- How to list a dual temp unit?
- Test at 87F?
- Recommendation of CEC was to reference APSP-14 2014 Exercise Spa protocol and develop strong data base for review.
- Review database after 2 years and establish proper energy limit.



## Dual Temperature Exercise Spas

- Per APSP-14, a dual temp exercise spa is to be tested; spa @ 102F and exercise @ 87F
- List as single exercise spa or list and label the two sections separately?
- What is the CEC intent?



## Energy Label Clarification

• Current – Intent to list "approved covers on label"

Based on testing with the spa manufacturer's specified cover. This spa must be sold with this cover or a manufacturer's approved equivalent.

Tested Cover Manufacturer:

Tested Cover Model:

Power calculated based on standby testing @ 60°F. Actual values will vary based on use.

This Label Must Remain Adhered to Spa Until Point of Sale.

Proposed – Only list tested cover

This spa was tested with the spa manufacturer's specified cover. Tested Cover Manufacturer: xxx Tested Cover Model: xxx

Power calculated based on standby testing @ 60°F. Actual values will vary based on use.

This Label Must Remain Adhered to Spa Until Point of Sale.



## APSP-14 Committee

## **Exercise Spas Recommendations**

- Request delay in implementation to allow CEC and APSP-14 committee time to review the requested change and jointly develop an energy savings program for Exercise Spas
- Follow CEC earlier recommendation to test per APSP-14 for exercise spas and list.
- Develop exercise spa specific test criteria after formal data review.



# Temporary Inflatable Spas



## What are Temporary Inflatable Spas?

- Lightweight inflatable tub with an attached small control box containing the heater and circulation/filtration pump
- Packs into a bag and a retail shelf box of approximately 20"x20"x30" size
- Low level of investment: commonly retails between \$300 and \$600
- Easy transportation, setup, as well as disassembly and storage
- Simple 110V plug-'n-play installation: setup time including inflation approximately 15 minutes

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- Temporary setup and use during warm months (spring, summer, early fall), usually set up for a few weeks at a time
- Easy disassembly and storage whenever non-operation is planned and during colder periods
- Relatively short product life expectancy of 3 years



#### Temporary Inflatable Spas vs. Rigid Portable Spas







APSP



Always Plug-'n-Play



Generally hard-wired



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## Temporary Inflatable Spas vs. Rigid Portable Spas - Metrics

METRIC	TEMP. INFLATABLE SPA	PORTABLE SPA
Lifespan	3 years	10 years
Usage/standby	Temporary/seasonal	Permanent/year round
Weight	100 lb	1000 lb – 2000 lb
Delivery	Passenger car	Truck & Crane
Cost	\$300 - \$600	\$5,000 - \$12,000
Electrical	110V Plug-'n-Play	110V or generally 220V hardwire
Portability	Unlimited	Limited
Storability	Yes	No



## Temporary Inflatable Spas – Current Status

- Never considered within data collection and testing/evaluation by the CEC and APSP-14
- Current metrics do not apply to this product class due to its aforementioned characteristics that set them apart from other portable spas
  - Temporary setup and use with considerably shorter standby periods overall
  - Unlimited portability and storability allowing reduced idle times
  - Significantly shorter product life span
  - Different consumer and type of use: renters and lower disposable income consumer



## Temporary Inflatable Spas

- Energy Saving Potential
  - Short life and temporary nature uses less energy over product life than estimated.
  - Low potential for annual energy savings with temporary inflatable spas as compared to Portable Spas
  - Estimated sales for the year 2015 of temporary inflatable spas in California indicate approximately 15,000 consumers/families



## APSP-14 Committee

- Inflatable Spas Recommendations
- APSP-14 is evaluating temporary inflatable spas as a separate class of product from Portable Spas and Exercise Spas.
- Inflatable spas cannot meet the proposed energy limit
- The proposed language would eliminate inflatable spas from the market and lower income citizens from the possibility to enjoy a spa
- Request delay in implementation to allow CEC and APSP-14 committee time to review the requested change and jointly develop an energy savings program for Inflatable Spas

