

DOCKETED

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Comment Received From: Jennifer Hatfield

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APSP Portable Electric Spa Comment on Docket No. 15-AAER-02

Additional submitted attachment is included below.

August 12, 2016

California Energy Commission
Docket No. 15-AAER-02
1516 9th Street, MS-4
Sacramento, CA 95814

To Whom It May Concern:

The Association of Pool and Spa Professionals (APSP), the International Hot Tub Association (IHTA) of the APSP, and the APSP-14 American National Standard for Portable Electric Spa Energy Efficiency Committee would like to thank the California Energy Commission and its staff members for the opportunity to review and comment on the ***Revised Analysis of Efficiency Standards for Pool Pumps and Motors and Spas*** (Analysis) published on June 16, 2016.

There are two remaining concerns we have in the Analysis: the reference to 6.3.1 and the energy label concerns in regards to the impact of changing the bar graph and the combo exercise spas labeling option.

Reference to 6.3.1:

The staff report references section 6.3.1 is to be omitted from the adoption of APSP-14. 6.3.1 is not a valid section. CEC staff is looking to reference where the exercise spa energy formula is $5 \cdot V^{2/3}$. The published September 2014 Standard references the exercise spa allowed energy formula in 8.2.

We request that the CEC update the language to reference the accurate section.

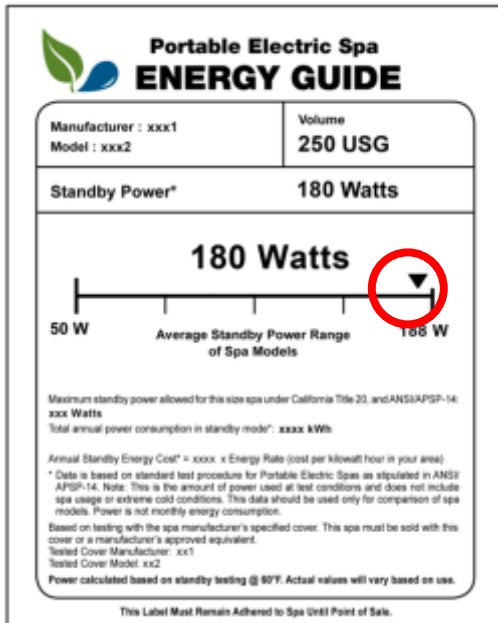
Energy label: Impact of changing the bar graph

It was proposed to change the energy bar chart on the label from an industry comparing label to a spa specific label. We are concerned that when the label max energy is the max energy allowed for the spa, the label will show how it compares against itself or another spa of the same volume. The consumer will now no longer be able to compare units across the industry in a simple and common manner. Customers don't shop by water volume, but by overall size, cosmetics, features, and performance. What can easily happen is that customers will see large spas appearing more efficient.

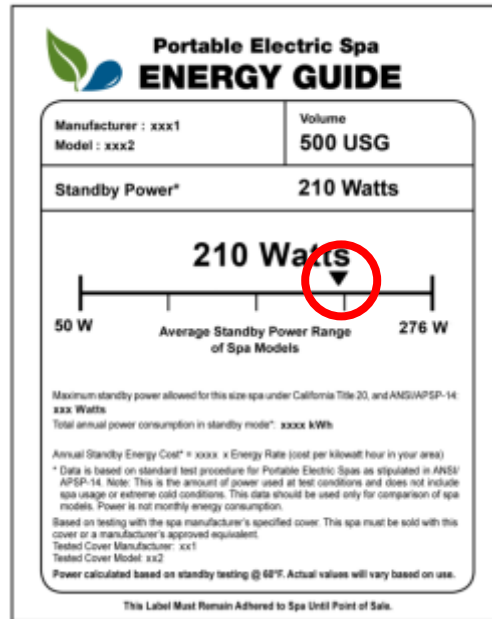
We request that the label be left unchanged so the customer can make better decisions as they shop spas model by model.

See the example below: Which is better?

Spa A:



Spa B:



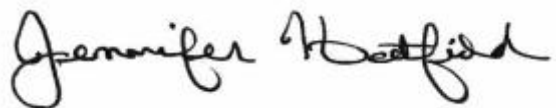
To a consumer, B is better because the unit is more “efficient”. However, to the manufactures and State of California, A is better because it uses less energy.

Energy label: Combo Exercise spa

There is a proposal for a third additional label for combo exercise spas, spas with a hot therapy and separate cool exercise section. We appreciate that the State is defining how to address this product – reporting each section with its own energy usage. Given that each section is reported separately, the manufacturers request that they be allowed an option to use a separate label for the spa size and one for the swim side. The volume of this product is quite small and to manage a third label creates an additional burden. Having the option to use a single or multiple labels would benefit the implementation of the labels.

We thank the CEC for its time and consideration.

Respectfully submitted,

A handwritten signature in black ink that reads "Jennifer Hatfield". The signature is written in a cursive style with a large initial "J" and "H".

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