

DOCKETED

Docket Number:	20-AAER-04
Project Title:	Appliance Efficiency Standards Regulations for Portable Electric Spas
TN #:	238473
Document Title:	Pool and Hot Tub Alliance Comments - Support for California Docket 20-AAER-04
Description:	N/A
Filer:	System
Organization:	Pool and Hot Tub Alliance
Submitter Role:	Public
Submission Date:	6/25/2021 10:17:44 AM
Docketed Date:	6/25/2021

*Comment Received From: Pool and Hot Tub Alliance
Submitted On: 6/25/2021
Docket Number: 20-AAER-04*

Support for California Docket 20-AAER-04

Additional submitted attachment is included below.



June 28, 2021

Submitted Via Email to: Jessica.lopez@energy.ca.gov

Re: Docket 20-AAER-04, Proposed Amendments to Existing Title 20 Appliance Efficiency Regulations for Portable Electric Spas.

Dear Jessica,

The Pool & Hot Tub Alliance (PHTA) and the International Hot Tub Association (IHTA) appreciates the opportunity to submit comments with regard to the California Energy Commission and its Notice of Proposed Amendments on Appliance Efficiency Regulations for Portable Electric Spas (20-AAER-04).

About the Submitting Organizations:

The Pool & Hot Tub Alliance was formed in 2019, combining the Association of Pool & Spa Professionals (APSP) and the National Swimming Pool Foundation (NSPF). With the mission to “Celebrate the Water,” PHTA facilitates the expansion of swimming, water safety and related research and outreach activities aimed at introducing more people to swimming, making swimming environments safer and keeping pools open to serve communities.

APSP, now the PHTA, is the world’s oldest and largest association representing swimming pool, hot tub, and spa manufacturers, distributors, manufacturers’ agents, designers, builders, installers, suppliers, retailers, and service professionals. Dedicated to the growth and development of its members’ businesses and to promoting the enjoyment and safety of pools and spas, PHTA offers a range of services, from professional development to advancing key legislation and regulation at the federal and local levels, to consumer outreach and public safety. PHTA is the only industry organization recognized by the American National Standards Institute to develop and promote national standards for pools, hot tubs, and spas. For more information, visit PHTA.org.

PHTA and the International Hot Tub Association (IHTA) work as a single entity to unite and strengthen the hot tub industry. The IHTA of PHTA consists of hot tub manufacturers, suppliers, and retailers along with associated companies whose products or services relate to the hot tub industry.



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Comments on Docket 20-AAER:

Requiring energy efficiencies save consumers and businesses money on their utility bill at the same time decreasing energy consumption and reducing greenhouse gases.

The portable spa provisions in this proposal are consistent with what is used within the industry and in other state and national standards. We fully support the requirement to have California portable spas meet the latest edition of the ANSI/APSP/ICC-14 Standard for Portable Electric Spa Energy Efficiency. This standard has been adopted by over 21 states through either the adoption of the International Pool and Spa Code (ISPSC) or by appliance energy efficiency legislation.

Additionally, at least 10 additional state legislatures filed to adopt the Portable Electric Spa Energy Efficiency APSP-14 Standard in 2021. To ensure consistency with what is required within this standard and a higher compliance rate, we strongly support its inclusion via this proposal.

PHTA and IHTA appreciates the opportunity to comment on this proposal. On behalf of the many California pool and spa professionals represented by PHTA and IHTA, we respectfully request that you consider approval of this proposal.

Sincerely,

A handwritten signature in black ink that reads "Tony Sadati".

Tony Sadati

IHTA Engineering Committee, Chairman
tony.sadati@jacuzzi.com

A handwritten signature in black ink that reads "Jason Davidson".

Jason Davidson

PHTA, Director of Government Relations
jdavidson@phta.org



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