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PHTA CPSA Comments on Pool & Spa Updates to 2025 CA Energy Code

Additional submitted attachment is included below.



Submitted via email
February 22, 2023

On behalf of the Pool and Hot Tub Alliance (PHTA) and California Pool and Spa Association (CPSA), we would like to submit the following public comments in response to pool and spa-related proposals for the 2025 California Energy Code cycle.

1. The International Swimming Pool and Spa Code (ISPSC) is the only comprehensive swimming pool code coordinated with the I-Codes and current ANSI/PHTA (APSP) Standards. A read-only version of the 2021 version is available at the following link: <https://codes.iccsafe.org/content/ISPSC2021P1>

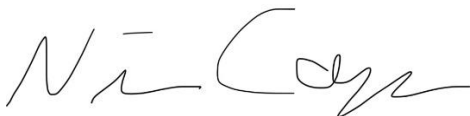
We would like to bring your attention to two sections of the ISPSC for consideration in developing the updates to the California Energy Code:

- Section 303 – Energy consumption of residential and commercial swimming pools and spas. This section addresses heaters (switch, continuously burning ignition pilots), time switches, and covers with references to the APSP 14 APSP 15 Standards.
 - Section 316 – Requirements for heaters used in residential and commercial pools and spas. The section requires solar water heaters to comply with ICC 902/PHTA 902/SRCC 400 in Table 316.2(2) and solar thermal collectors to comply with ICC 901/SRCC 100 in 316.6.2.
2. It is recommended that the consideration of adoption of the ANSI/APSP (PHTA)/ICC-15 Standard. This Standard covers energy efficiency requirements for permanently installed residential aboveground/onground and inground swimming pools and inground spas operated by the property owner and used for bathing. It is intended to cover certain aspects of the swimming pool filtration system design; equipment, including pool and spa heaters; installation; and operational capabilities, for the purpose of minimizing energy consumption while maintaining water quality and temperature. A read-only version of the Standard is available for review at the following link: https://issuu.com/thephta/docs/apsp-15_2011_includes_addenda_a_approved_010913
 3. Section 110.4 – We would like to request clarification on the intent is for change from “pools or spas” to “pools and spas” throughout. It is our opinion that the current language is more encompassing and accurate.
 4. Section 110.4(a)(3) – As the definition of Pool Heater includes spa heaters, we recommend only referring to pool heaters in order to avoid confusing code language.
 5. Section 110.4(b)(2) – We recommend the addition of non-mandatory language on pool covers as guidance and refer you to the language on pool covers provided in Section 305 of the ISPSC.
 6. Section 110.4(c) (2) – Item 2 does not include renewable natural gas and other renewable energy systems, include utility-supplied renewable energy and utility-supplied recoverable energy. We recommend these renewable energy options are included to ensure all renewable and recoverable energy systems are recognized in the Code.
 7. Special 110(c)(3) – We recommend a gas heat option to ensure all renewable and recoverable energy systems are recognized in the Code.

8. Section 110.4 (c) – We recommend adding a third exception for existing gas utilities to ensure all renewable and recoverable energy systems are recognized in the Code especially those that have long been established and provided by utilities.
9. Appendix NA 9 – We have concerns regarding the enforcement abilities regarding the language on collector position/shade and would appreciate additional information on how the enforcement of this mandatory item would be addressed.
10. Pump sizing and flow rate, Section A – We are requesting clarification and additional information on which State or Federal Appliance Standards will apply? We recommend that all relevant Standards, including the federal dedicated purpose pool pump rules, should be explicitly stated.
11. Pump sizing and flow rate, Removal of Exception “Pumps less than 1 hp may be single speed” – This exception may be recognized in a future US Department of Energy rulemaking. How will the Code address this potential issue of harmonization?
12. Pump sizing and flow rate, Sections E and F – As these sections assume flow control, we request clarification as to issues when there is no flow control. We recommend additional language be added to address this issue.
13. To harmonize with federal rulemaking language and other industry documents, we recommend a change in terminology from “pump motors” to “replacement dedicated purpose pool pump motors”.
14. We recommend adding the definition of Variable Speed that aligns with federal rulemakings and UL 1004-10.
15. We recommend that the requirement for variable speed products should not include smaller pumps (< 1.1 HP). This recommendation stems from the fact that there are few products in the marketplace under 1 and fractional pumps will not provide adequate flow.
16. We would like to note that the US Department of Energy is undergoing a rulemaking on heat pump pool heaters, and we would ask that all consideration be given to ensure there are no preemption issues between the California Energy Code and federal regulations. The relevant Notice of Public Rulemaking is available at the following link: <https://www.regulations.gov/document/EERE-2021-BT-STD-0020-0006>

Thank you for your time in reviewing our feedback and look forward to the next steps in the code cycle.

Respectfully,



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