



CALIFORNIA SOLAR ENERGY INDUSTRIES ASSOCIATION

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June 15, 2007

Jackalyn Pfannenstiel, Chairman  
Arthur Rosenfeld, Commissioner  
California Energy Commission  
1516 9<sup>th</sup> Street  
Sacramento, CA 95814

<b>DOCKET</b>	
<b>05-BSTD-2</b>	
<b>DATE</b>	<b>JUN 15 2007</b>
<b>RECD.</b>	<b>JUN 15 2007</b>

Re: **Docket Number: 05-BSTD-2** Proposed 2008 amendments to Title 24, Section 114  
Regarding mandatory requirements for pool and spa systems and equipment

Dear Chairman Pfannenstiel and Rosenfeld:

The California Solar Energy Industries Association (CALSEIA) was founded in 1977. CALSEIA represents solar electric and solar thermal manufacturers, distributors, contractors, designers, consultants, engineers and associated businesses who do business in California. CALSEIA supports the widespread adoption of solar thermal and solar electric systems. There are currently over 190 CALSEIA Member companies.

CALSEIA filed concerns over the proposed revisions to Section 114 published on February 21, 2007. Our concerns are focused on whether the proposed requirements would impede the use of solar heating for swimming pools in California. We urged the Energy Commission to avoid requirements that could cause sub-optimal performance of the solar panels and increase homeowner's operation costs.

A modern pool installation will always have a filtration system and one or more of the following: waterfalls, water slide, hot tub, pool sweep, gas heater, solar pool heating systems, and/or chlorinator. Pump flow rates and lift capacity are important to the proper functioning of all of these components. But the only component listed that is sensitive to the time of day it must be operated, is the solar pool heating system. Solar pool heating relies on circulating pool water through the panels for several hours, most typically during the afternoon.

Variable speed pumps and dual speed pumps are great in theory and if sized, installed, and operated correctly will function correctly for all of the parts of the pool installation. The variable speed and dual speed pumps operate in the high flow mode to circulate water through the solar panels and in the low-flow mode when circulating water for filtration. Solar pool heating systems will not operate correctly when the pumps are set at the low speed setting

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But a high speed pump installed with a solar pool heating system will multitask and provide both filtration and heating simultaneously. Installing an extra pump specifically for the solar heating system raises the cost of the system and due to inadequate space at the pool equipment pad, may not be an option at all.

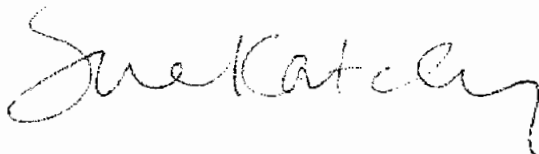
For purposes of promoting renewable energy, it would also seem appropriate that the Energy Commission should consider modifying the standards to ensure that all pools are installed with solar pool heating systems instead of gas or electric heating systems (with an exception for spas and hot tubs).

For this reason, CALSEIA requests that this section of the standards be modified to ensure that solar pool heating systems are encouraged, rather than discouraged through the standards.

We have initiated a discussion with Energy Commission staff and the Davis Energy Group to work on modifying the proposed language to address our concerns and develop language that ensures that customers who operate solar pool heating systems are not adversely impacted by these proposed changes.

Thank you for the opportunity to provide these comments. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Sue Kateley". The signature is written in a cursive, flowing style with a long, sweeping underline.

Sue Kateley  
Executive Director