



DOCKET

12-AAER-2

DATE MAR 21 2012

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Docket No. 12-AAER-2
California Energy Commission
1516 Ninth Street, Mail Station 4
Sacramento, CA 95814-5512

RE: 2012 Rulemaking on Appliance Efficiency Regulations

I am writing you on behalf of the Board of Directors and members of the ***International Hot Tub Association (IHTA)***. The IHTA is an international trade association which solely represents portable hot tub manufacturers, distributors, suppliers and retail dealers. It is our mission to be the educational resource for our industry and to promote the benefits of portable hot tubs and swim spas in order to increase awareness and sales throughout the world. Part of that mission includes being aware of code, regulation and legislative changes and assisting consumers, industry and government officials with questions specific to the portable hot tub industry.

All our members agree to abide by all local, state and federal laws which include having the proper certifications, licenses and insurance for all the municipalities where they do business. We are writing you to provide written comments regarding Docket No. 12-AAER-2.

Similar to the approach the CEC is taking with pool pumps in reviewing and considering adopting ANSI/APSP/ICC-15, the IHTA requests that PG&E and CEC review the *ANSI/APSP/ICC-14 2011 Standard for Portable Electric Spa Energy and Efficiency* and consider using this new standard for energy efficiency compliance. This standard not only addresses PG&E's concern requiring a product to be marked, but also includes exercise spas (swim spas) in the scope of the standard. The CEC and PG&E can be confident that the results being reported are factual because the standard requires the testing facility be 3rd certified to *ANSI/APSP/ICC-14*. All other aspects of this standard are in harmony with Title 20.

If you have any questions regarding our comments, please don't hesitate to contact us.

Best regards,

Mitch Brooks
IHTA Executive Director

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