



NATURAL RESOURCES DEFENSE COUNCIL

California Energy Commission

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**NRDC's Response to CEC's Invitation to Participate
in the Development of Appliance Energy Efficiency Measures**

**2013 Appliance Efficiency Pre-Rulemaking on Appliance Efficiency
Regulations: Docket Number 12-AAER-2G - Portable Electric Spa Labeling**

May 9, 2013

Submitted by:

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On behalf of the Natural Resources Defense Council and our more than 250,000 members and online activists in California, we respectfully submit this response to the Energy Commission's Invitation to Participate in the Development of Appliance Energy Efficiency Measures, posted on March 25, 2013.

NRDC supports the addition of a labeling requirement for portable electric spas/hot tubs. While portable electric spas are currently regulated by Title 20, they are not required to be labeled and so information on their efficiency and standby energy use is not readily available to consumers making purchasing decisions. Labeling of portable electric spas would provide consumers with information to make better-informed decisions and would facilitate compliance with the Title 20 standards.

1. Electric Spa Labeling

1.1 2008- 2013 Annual gross sales in California (national data if CA specific is not available).

No response.

1.2 Estimated unit sales for 2014 and beyond.

No response.

1.3 How are electric spas already labeled? Do these labels include energy consumption/efficiency? Where are consumers most likely to look for efficiency information when purchasing a spa?

Portable electric spas are not currently labeled. The CEC currently collects information in its Appliance Database on: manufacturer, model, motor efficiencies, construction type, voltage, volume, and standby power for portable electric spas. Of this collected data, information on motor efficiencies and standby power would help provide consumers with useful information on the product's energy use. Additionally, the other data collected by CEC in the Appliance Database would likely be useful to consumers, although it is not related to the product's energy efficiency.

1.4 How is energy efficiency best communicated to consumers?

A label that included information on standby energy use for portable electric spas would help inform consumer purchasing decisions. Additionally, total annual energy use and projected annual energy costs would likely aid consumer purchasing decisions, in particular for consumers choosing between different heating fuels.

1.5 Operational cost of the unit per year? What is the anticipated benefit of educating consumers on efficiency at the point of sale?

According to the EIA's Household Electricity Report in 2001, average per unit electricity consumption for hot tub/spa/pool heaters was 2300 kWh per year.¹ While this energy use may have decreased somewhat since this data was collected due to the adoption of the Title 20 standard in 2004, even under that standard, a 300 gallon portable electric spa would be permitted to use up to 1963 kWh of electricity per year.² At 15 cents/kWh, this is equal to about \$300 per year in energy costs. Furthermore, several options exist to improve efficiency in portable electric spas such as improved insulation, covers, and circulation pumps.³ Due to the large energy use of portable electric spas and available options to improve their efficiency, labeling portable electric spas has large potential benefits to consumers. Providing information on energy costs in particular would allow consumers to make their decision based on life cycle costs, rather than just first cost.

No response.

6.6 What are the cost of producing and affixing current labels on Spas?

No response.

¹ http://www.eia.gov/emeu/repse/enduse/er01_us_tab1.html

² Maximum standby energy use in Watts = $5 * (\text{Volume in Gallons})^{(2/3)}$

³ <http://www.appliance-standards.org/product/portable-electric-spas>

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