

Portable Electric Spa Labeling

Response to California Energy Commission
2013 Pre-Rulemaking Appliance Efficiency
Invitation to Participate

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Summary

The information below provides direct responses to the California Energy Commission's (CEC) Invitation to Participate (ITP) for the 2013 Appliance Efficiency Pre-Rulemaking, regarding Portable Electric Spa Labeling, including reference to several primary sources, some of which are attached separately (see References for more details). This document includes all of the questions asked in the ITP, even for those with no response.

In summary, CEC has an excellent opportunity to communicate energy efficiency to customers of new portable electric spas/ hot tubs in California. While portable electric spas are currently regulated by Title 20, including testing, reporting, listing, and minimum standby power standards, an opportunity exists to label these hot tubs with their standby energy consumption. This will facilitate informed consumer purchasing decisions and will decrease sales of noncomplying units if any are sold in the state.

There are a few primary sources of data for consideration that we have referenced:

- 1. U.S. Swimming Pool and Hot Tub Market 2012 Report**

This report, compiled by P.K. Data, provides national and state based data about the installed capacity and annual installs for in-ground pools, above ground pools, commercial pools and hot tubs (Note: Hot tub data does not differentiate between portable and in-ground hot tubs).

- 2. CEC Appliance Database**

The CEC Appliance Database provides data about portable electric spas including: manufacturer, model, motor efficiencies, construction type, voltage, volume, standby power and more.

- 3. Residential Appliance Saturation Survey (RASS) 2009**

The 2009 RASS survey provides valuable data about the statewide saturation, unit energy consumption, fuel type, size and more regarding portable electric spas.

We thank CEC for the opportunity to be involved in this process and encourage CEC to carefully consider this submission and the supporting documentation.

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1 Electric Spa Labeling

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

According to the Residential Appliance Saturation Survey (RASS) 2009 developed by KEMA in 2010, 10 percent of California residences own a spa or hot tub (portable and non-portable); 92 percent of these (approximately 1.0 million spas) are at single-family homes. Of these, about 50 percent are heated by natural gas and 45 percent are heated by electricity, with the remainder heated by a combination of solar power, natural gas, bottled gas, or electricity. About 46 percent (0.46 million units) are outdoor above-ground, 47 percent are outdoor in-ground, and the remainder are indoor ([KEMA 2010](#)). The market reality is that almost all above ground spas are portable electric spas.

According to the Association of Pool and Spa Professionals (APSP) U.S. Swimming Pool and Hot Tub Market 2012 report there are 7,442,000 hot tubs in the U.S. with 173,000 being sold/ installed in 2011 ([P.K. Data 2012](#)). There are 1,488,016 installed hot tubs (including commercial and in ground) installed in CA. Applying the national growth rate (2.4%) to California's installed above ground portable electric spa market (from the RASS data) there are roughly 10,902 above ground portable spas sold in CA every year.

1.2 Estimated unit sales for 2014 and beyond

No response.

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

Currently, portable electric spas are not labeled, but useful data is available in the CEC Appliance Database. This database provides information about portable electric spas including: manufacturer, model, motor efficiencies, construction type, voltage, volume and standby power. ([CEC 2012](#))

1.4 How energy efficiency is best communicated to consumers?

No response.

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

No response.

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

No response.

References

(References attached separately are highlighted in grey)

[CEC] California Energy Commission Appliance Efficiency Database 2013, Portable Electric Spas
<http://www.appliances.energy.ca.gov/>.

[P.K. Data] P.K. Data, Inc. 2012. U.S. Swimming Pool and Hot Tub Market 2012. 2012.
<http://www.apsp.org/utility/showDocumentFile/?objectID=1058>.

[KEMA] KEMA, Inc. 2010. California Statewide Residential Appliance Saturation Study (RASS)
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