



California Energy Commission

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April 30<sup>th</sup>, 2013

California Energy Commission  
1516 Ninth Street, Mail Station 4  
Sacramento, CA 95814-5512

RE: Questions regarding Electric Spa Labeling

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 as well as 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 to your questions regarding Electric Spa Labeling.

1. 2008 - 2013 annual California or National sales?

*Sales information not available to IHTA*

2. Estimated sales for 2014 and beyond?

*Sales information not available to IHTA*

3. How are electric spas currently labeled?

*All spas have a product label with the manufacturer, ratings, and safety compliance information. Many spa labels include energy compliance information in the ANSI/APSP-14 Portable Electric Spa Energy Efficiency Standard statement format.*

4. Do these labels include energy consumption and energy efficiency?

*Spas compliant to ANSI/APSP-14 Portable Electric Spa Energy Efficiency Standard, developed in conjunction with the CEC, are marked with spa energy efficiency information consistent with CEC Title 20 requirements.*

*Label Statement:*

*"Per ANSI-14 Measured Standby Power Consumption XXXX Watts  
(Maximum Allowable Standby Power Consumption XXXX Watts)"*

5. Where are consumers most likely to look for efficiency information when purchasing a spa?

- A spa manufacturer's website.
- A spa dealer
- Point of Sale Literature

- The product itself
- Many manufactures and spa dealers direct customers to the CEC Appliance Database

6. Explain how energy efficiency is best communicated to consumers?

*Energy efficiency is best communicated in a standardized format to make the marking and information relevant. A single label or reference is recommended to prevent the consumer from becoming confused. The ANSI/APSP-14 label provides equivalent Title 20 energy consumption information that is directly comparable model to model. It also provides the maximum allowable energy usage of the spa size class and where this model sits in the group.*

7. Operational cost of the unit per year?

*It is not recommended to offer an operating annual cost amount as this only causes unrealistic expectations. The spa is an outdoor product with many energy operating states beyond the factory standby mode of ANSI/APSP-14 and Title 20. There are also many other significant variables that would impact the average annual energy usage and confuse the owner. The variables include but are not limited to: Variable energy costs region to region, tier pricing and peak/off-peak pricing; variable outdoor operating temperatures (-40 - 100F); and multiple operating modes beyond standby.*

8. What is the anticipated benefit of educating consumers on efficiency at the point of sale?

*Providing the knowledge to customers with a reliable comparison of the spas energy usage relative to other spas and appliances.*

9. What are the costs of producing and affixing the current labels on the spas?

*Current spa product labels cost a few dollars to print, serialize, and affix to the spa. In most cases the current label can accommodate spa energy information. Adding additional labels or competing energy statements adds unnecessary costs and confusion to the market place.*

**A comment in regards to labeling:** We highly recommend that the CEC follow the current labeling requirement in ANSI/APSP/ICC-14 2011 Standard for Portable Electric Spa Energy and Efficiency. This standard was co-developed with the CEC and is based on Title 20. Other states have adopted this standard which includes this labeling requirement. This will meet your requirements avoid consumer confusion, and keep standards consistent.

As always, please don't hesitate to contact us if you have any questions!

Best regards,



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IHTA Executive Director

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