



California Energy Commission

DOCKETED
12-AAER-2G

TN 71550

JUL 11 2013

June 27, 2013

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

RE: Portable Electric Spas Energy Efficiency Compliance Standard – Docket #12-AAER-2G

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.

Attached is our proposal regarding the Portable Electric Spas Energy Efficiency Compliance Standard. As always, please don't hesitate to contact us if you have any questions!

Best regards,

Mitch Brooks
IHTA Executive Director

**Proposal for Standards
Portable Electric Spas Energy Efficiency
Compliance
Docket #12-AAER-2G**

Appliance Efficiency Standards and Measures

for California Energy Commission's Invitation to Submit Proposals

Mitch Brooks, Executive Director

June 27, 2013

International Hot Tub Association (IHTA)

Portable Hot Tub Industry

Executive Summary

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 highly recommend and propose that the CEC adopt the ANSI/APSP/ICC-14 2011 Standard for Portable Electric Spa Energy and Efficiency for energy efficiency compliance for Portable Electric Spas and Swim Spas.

Rationale

This energy standard was developed by top energy and industry professionals throughout the country and is becoming part of many municipal codes across nationwide. The **ANSI/APSP-14 Standard for the Energy Efficiency of Self-Contained Portable Electric Spas and Hot Tubs** not only is an accepted ANSI Standard, but is also approved by the ICC. Many folks from around the country spent a significant amount of time developing this standard which was years in the making with the intent of writing a federal energy standard. The standard is based on a collaborative effort dating back to 2005 between the *Association of Pool & Spa Professionals*, leading portable spa manufacturers, and the *California Energy Commission* and its contractors *Pacific Gas and Electric (PG&E)* and the *Davis Energy Group*. The testing procedures in this standard are based on that effort and the test method for portable spas described in Section 1604 of Title 20, California Code of Regulations as amended December 3, 2008. This standard not only addresses concerns requiring a product to be marked, but also includes exercise spas (swim spas) in the scope of the standard. The CEC can be confident that the results being reported are factual because the standard requires the testing facility be 3rd party certified to ANSI/APSP/ICC-14. All other aspects of this standard are in harmony with Title 20.

The recommendations and testing practices in this standard are based upon sound engineering principles, research and field experience that, when applied properly, contribute to the delivery and installation of a safe and “energy efficient” product.

Summary of Proposal

We highly recommend and propose that the CEC adopt the ANSI/APSP/ICC-14 2011 Standard for Portable Electric Spa Energy and Efficiency for energy efficiency compliance for Portable Electric Spas and Swim Spas. 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.

A copy of ANSI/APSP/ICC-14 2011 Standard for Portable Electric Spa Energy and Efficiency is attached.

July 11, 2013
