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The Global Source and Voice for the Recreational Water Industry

California Energy Commission

**DOCKETED**

**12-AAER-2G**

**TN 73219**

**JUN 17 2014**

June 4, 2014

Re: Docket #12-AAER-2G, "Portable Electric Spas CASE Initiative for PY 2012 Title 20 Standards Development"  
author, California Investors Owned Utilities (CA IOU's)

To: Docket Officer:

This letter is submitted on behalf of the Association of Pool and Spa Professionals (APSP), and the Standards Writing Committee of the ANSI/APSP/ICC-14 American National Standard for Portable Spa Energy Efficiency. The APSP and the Standards Writing Committee fully support the recommendations contained in the above referenced CASE initiative regarding labeling, new formula for allowable energy usage, and test procedures.

The APSP -14 Standards Writing Committee has commenced revisions to the currently published 2011 edition, in an attempt to align the standard with the above CASE recommendations, and believe that a 2014 published version of the ANSI/APSP/ICC-14 American National Standard for Portable Spa Energy Efficiency would likely be approved before the end of this year.

Upon final ANSI approval, we would request that the California Energy Commission adopt or reference the 2014 ANSI/APSP/ICC-14. This will facilitate industry compliance and consumer access to compliant products. Therefore, we would propose the following revisions to Title 20:

1604 (g)(2)

Portable electric spas shall be tested in accordance with ANSI/APSP/ICC-14 2014.

1605.3 (g)

(6) Portable Electric Spas

(A)Energy usage in Portable Electric Spas shall be in compliance with ANSI/APSP/ICC-14 2014

1607 (d)

(12) Portable Electric Spas

The spa shall be labeled in accordance with ANSI/APSP/ICC-14 2014

Sincerely,

Carvin DiGiovanni

Senior Director, Technical and Standards