



May 28, 2020

Commissioner Andrew McAllister
California Energy Commission
1516 9th Street, MS 34
Sacramento, California 95814

Submitted online through 19-DECARB-01 Portal

RE: BUILDING DECARBONIZATION DOCKET LOG (19-DECARB-01)

Dear Commissioner McAllister:

The Pool and Hot Tub Alliance (PHTA), *formerly the Association of Pool and Spa Professionals*, on behalf of its over 3,500 company members nationwide and 232 members companies in California, respectfully submits the following comments for consideration by the California Energy Commission (CEC).

1. ABOUT THE SUBMITTING ORGANIZATION

The Pool & Hot Tub Alliance was formed in 2019, combining the Association of Pool & Spa Professionals (APSP) and the National Swimming Pool Foundation (NSPF). With the mission to “Celebrate the Water,” PHTA facilitates the expansion of swimming, water safety and related research and outreach activities aimed at introducing more people to swimming, making swimming environments safer and keeping pools open to serve communities.

APSP, now PHTA, is the world’s oldest and largest association representing swimming pool, hot tub, and spa manufacturers, distributors, manufacturers’ agents, designers, builders, installers, suppliers, retailers, and service professionals. Dedicated to the growth and development of its members’ businesses and to promoting the enjoyment and safety of pools and spas, PHTA offers a range of services, from professional development to advancing key legislation and regulation at the federal, state and local levels, to consumer outreach and public safety.

PHTA is the only industry organization recognized by the American National Standards Institute (ANSI) to develop and promote national standards for pools, hot tubs, and spas. Since 1983, APSP (now PHTA) has been accredited by ANSI as the Standards Development Organization for the nation's pool and spa standards. These national consensus standards establish voluntary minimum guidelines that, when

adopted by governments and agencies, have the force of law. PHTA has developed 16 ANSI certified standards that are used in the design, operation, and maintenance of swimming pools.

The PHTA is also the co-developer, along with the International Code Council (ICC), of the International Swimming Pool and Spa Code (ISPSC) which has been adopted internationally and in over 370 local jurisdictions within the United States. The ISPSC is recognized at the state level in 13 states, with an additional 19 states having optional local adoptions. PHTA is also represented on and participates in various other standards-making organizations promulgating standards including the ICC, American Society of Testing and Materials (ASTM1551), and the National Electrical Code®. In addition, the PHTA provides educational programs and monitors the accredited continuing education requirements for various licensing programs for aquatics professionals.

2. THE SWIMMING POOL AND SPA INDUSTRY IN CALIFORNIA

The California pool and spa market is the largest in the world. According to 2017 data, obtained by PK Data, California has the largest number of inground installed pools in the country at 1.2 million. In addition, there were 13,689 new inground construction projects underway in California in 2017.

According to the same 2017 data, California also leads the nation in:

- Number of aboveground pools installed (331,939)
- New aboveground pool sales (20,236)
- Hot tubs installed (1.2 million)
- New hot tub sales (87,890)
- Commercial pools installed (41,438)
- New commercial pool sales (662)

Nationally, the pool and hot tub industry contributes \$36.5B and accounts for 382,000 job equivalents to the U.S. economy, with a large portion of that attributed to the market size in California. Many of our industry members in the State have experienced an increase demand due to the recent events surrounding the COVID-19 Pandemic. As Governors continue to extend stay-at-home orders and health officials advise the country to shelter in place, people are utilizing residential pools and spas now more than ever. Many commercial and semi-commercial aquatic venues remain temporarily closed or have decided to close for the entire season due to COVID-19. Our industry members in California, and nationwide, are telling us that business is close to three times what it usually is this time of year. More consumers are installing pools and spas or deciding to refurbish/maintain their pools and spas rather than using commercial, semi-commercial, or other aquatic venues where they may risk close contact with other people in this age of social distancing.

3. COMMENTS ON BUILDING DECARBONIZATION

When a consumer decides to install a pool or spa in their backyard, it is not simply the pool or spa that is installed. As you may be aware, pools and spas are usually complimented by other backyard features including, but not limited to pool deck, patio, terrace, fireplace, grill/outdoor kitchen, pool/bathhouse, etc. California is home to possibly some of the most exotic backyard landscapes and designs. California's natural beauty and geographic features make it perhaps the best place in the world to install a pool and/or spa and get creative with your "California Dream backyard."

However, the California dream backyard would not be what it is today without the use of natural gas. Having natural gas infrastructure in place is pivotal to achieve the consumer's true vision. Implications from completely banning natural gas would not only effect backyard amenities such as grills and fireplaces but would also have negative impacts on the consumer's swimming pool and spa. To rely completely on electricity to heat pools and spas would extend the amount of time needed to heat the pool or spa to the consumer's desired temperature. In some areas, like Northern CA, this would mean it can take weeks to heat your pool or spa, depending on the size and geographic location of the pool/spa. When a consumer wants to get in their spa at night, they want to be able to heat it immediately, not have to plan ahead a week. Further, there is the absorbant financial cost to use electric means in these type of scenarios as well as the burden that puts on what can be an overtaxed electric grid.

PHTA is in support of balanced approaches to the inevitable climate issue and ultimately reducing carbon emissions. This includes the usage of solar, electric, and natural gas utilities as well as the implementation of these wherever they are the most efficient, logical, and least financially burdening for the consumer. Implementing electricity for pool heating and other applications can be achieved, however it would cause wide implications if it were the only option. We support a balanced and consumer-driven approach to building decarbonization which includes the usage of natural gas, solar, and electricity as they pertain to pools and spas. However, relying explicitly, and mandating electric-only utilities is not in the favor of the consumer's wallet, our industry members, and of course all the people of your state who seek the California dream backyard.

Thank you for the opportunity to provide these comments.

Sincerely,



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