



2111 Eisenhower Ave., Ste 500
Alexandria, VA 22314

November 14, 2023

The Honorable Robert F. Matzie
202 Irvis Office Building
P.O. Box 202016
Harrisburg, PA 17120-2016

The Honorable Jim Marshall
214 Ryan Office Building
P.O. Box 202014
Harrisburg, PA 17120-2014

Re: Support for House Bill 1615 - An Act providing for minimum energy and water efficiency standards for certain products

Dear Chair Matzie, Chair Marshall, and members of the House Consumer Protection, Technology, and Utilities Committee,

On behalf of the Pool and Hot Tub Alliance (PHTA), a non-profit organization with more than 3,700 member companies, I write to you today in support of House Bill 1615. This bill will establish minimum energy and water efficiency standards for certain products sold in the Commonwealth.

PHTA is the leading industry organization that is ANSI accredited to develop and promote national consensus standards for residential and public swimming pools, hot tubs, and spas. Our organization also includes the International Hot Tub Association (IHTA), which is focused on developing standards and codes exclusively around hot tubs, or in the context of this legislation, Portable Electric Spas.

Within this bill, it states that portable electric spas must meet the criteria as outlined by ANSI/APSP/ICC-14-2019 - Portable Electric Spa Energy Efficiency standard. This standard was developed by our organization following ANSI accredited consensus-based public processes.

This standard includes testing procedures and methods that confirm a manufacturer's claim, it requires energy consumption labels that help consumers compare models, it promotes reduced energy consumption, and creates third-party verification and validation procedures for testing with clear pass/fail criteria. This standard ensures that products meet consumer expectations, save consumers energy and money on utility bills, and holds bad actors accountable.

The Commonwealth currently enforces another PHTA-developed code, the International Swimming Pool and Spa Code (ISPSC), which is the PHTA and International Code Council's (ICC) model code around swimming pools and spas. While the Commonwealth currently enforces the 2018 version of the ISPSC, more recent versions of the code (2021 and 2024) reference the APSP-14 standard and therefore any future adoption of a more recent ISPSC will be fully compatible with this portable electric spa standard.

The Commonwealth is currently home to over 147,000 hot tubs and that number continues to grow each year. With so much popularity, residents and the Commonwealth stand to greatly benefit from the adoption of APSP-14 through a reduction in energy demand and lower utility bills for hot tub owners.

PHTA fully supports HB1615 and urges a favorable report.

Sincerely,

Tyler D. Jones
Director of Government Relations
Pool and Hot Tub Alliance

TJones@phta.org

About Us:

The Pool & Hot Tub Alliance (PHTA), a non-profit organization with more than 3,700 members from around the world, was established in 1956 to support, promote, and protect the common interests of the \$50 billion pool, hot tub, and spa industry. PHTA provides education, advocacy, ANSI accredited standards development, research, and market growth initiatives to increase our members' professionalism, knowledge, and profitability. Additionally, PHTA promotes the use of pools by expanding 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. For more information, visit www.phta.org.