



June 27, 2024

Submitted via: <https://www.reginfo.gov/public/do/PRAMain>

Re: Comments on the 2024 Residential Energy Consumption Survey (RECS), OMB No.: 1905-0092

Office of Information and Regulatory Affairs (OIRA),

The Pool & Hot Tub Alliance (PHTA) and International Hot Tub Association (IHTA) represent more than 4,000 company members and over 11,000 individual members nationwide that range from swimming pool, hot tub, and spa manufacturers, distributors, manufacturers' agents, designers, builders, installers, suppliers, retailers, and service professionals. The IHTA of PHTA consists of hot tub manufacturers, suppliers, and retailers along with associated companies whose products or services relate to the hot tub industry. The U.S. swimming pool and hot tub industry contributes about \$50 billion and almost 445,000 job equivalents to the U.S. economy.

PHTA/IHTA welcomes the opportunity to provide comments regarding the 2024 Residential Energy Consumption Survey (RECS or survey). We support the changes being made to the pool, spa, and hot tub questions, specifically:

(Your Home) Changed questions asking how many months your pool and hot tub were "in use" to how many months the pool pump/hot tub were "turned on." This change should better capture when pool equipment is running.

(Your Home) Added a question asking how many months a respondent's pool is heated. Pool heating can account for considerable energy use for a home and this question will improve EIA's ability to model pool energy end-use consumption and expenditures.

However, in our review of the 2024 RECS, we have concerns related to the three questions that ask the homeowner about their "hot tub, spa, or Jacuzzi". Those questions are:

1. Does your home have its own hot tub, spa, or Jacuzzi, other than a bathtub?
2. In the past year, how many months was your hot tub, spa, or Jacuzzi turned on?
3. What fuel is used to heat the water in your hot tub, spa, or Jacuzzi?
 - a. Electricity
 - b. Natural gas from underground pipes
 - c. Propane (bottled gas)
 - d. Fuel oil
 - e. Other (specify below)

We recognize these are existing questions not currently being suggested for modification beyond the change from "in use" to "turned on" but we would be remiss in not bringing to your attention our concerns that as these three questions are currently written, the data collected may not be accurate.

Although the terms “hot tub”, “spa”, and “Jacuzzi” are used interchangeably by consumers, the term “Jacuzzi” is a trademarked brand name. Further, there are different types of hot tubs or spas, and the energy use differs with those types.

A factory-built spa/hot tub is defined by both the industry and the Department of Energy (DOE) as a “portable electric spa”. The DOE defines a “portable electric spa” as “a factory-built electric spa or hot tub, supplied with piping and equipment for temperature-controlled circulated water at the time of sale or sold separately for subsequent attachment.” Typically, PES are left in standby mode year round, but for rare occasions where a homeowner may turn off, drain or winterized. Standby mode is where all settings are set as default, as shipped by the manufacturer. No manual operations are enabled to power the various jets or other functions. When the homeowner wants to use the PES, they will then turn on what functions they want to use. The energy needed to go from standby mode, to being in use, is different than the energy use to circulate and heat a permanent spa.

Whereas a “permanent spa” is a permanently constructed spa where piping and equipment are an integral part of the structure, and not intended to be moved. In many cases, a homeowner with a permanent spa will also have a pool that it is attached to, known as a pool/spa combo. In those cases, the circulation equipment is typically used for both the pool and permanent spa, where the spa can be isolated in cases where the homeowner only wants to heat the permanent spa. Depending on the part of the country, the pool and/or permanent spa may be winterized and only used during the warmer months or may be running all year round.

Based on this information, we suggest that the survey separate PES from permanent spas, and it may be appropriate to first ask if that permanent spa is attached to their pool. If the answer is yes, then the answers made to the pool questions would also apply to the permanent spa questions. If the answer is no, the permanent spa questions would need to still be asked as it relates to how many months it was turned on and what fuel was used to heat it.

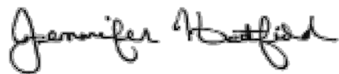
If it is possible to explain to the homeowner the different types of spas/hot tubs, then by separating PES from the permanent spas and/or pools, the data collected will be more accurate. Our initial suggestions would be as follows:

1. Does your home have its own factory built spa purchased as an appliance (not constructed), also known as a hot tub or portable electric spa that uses electricity to run and is not a bathtub?
2. How many times a week do you use your factory-built spa?
3. When you use your factory-built spa, on average, how long do you run the jets?
4. Does your home have its own permanent spa or hot tub that was constructed and not purchased as an appliance?
5. Is the permanent spa attached to your pool, using the same circulation and heating system?
6. If the permanent spa is standalone or uses a separate circulation and heating system, in the past year, how many months was it turned on?
7. What fuel is used to heat the water in your permanent spa?
 - a. Electricity

- b. Natural gas from underground pipes
- c. Propane (bottled gas)
- d. Fuel oil
- e. Other (specify below)

PHTA and IHTA welcome the opportunity to further assist with a solution. We appreciate the consideration of these comments by OIRA and hope they are helpful in finalizing the revisions to the 2024 RECS.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Hatfield". The signature is written in a cursive, flowing style.

Jennifer Hatfield
Government Affairs Consultant
Pool & Hot Tub Alliance

cc: Justin Wiley, PHTA VP of GR, Standards and Codes, jwiley@phta.org