



April 1, 2021

The Honorable Dereck E. Davis  
House Economic Matters Committee  
Room 231 House Office Building  
6 Bladen Street  
Annapolis, Maryland 21401

The Honorable Kathleen M. Dumais  
House Economic Matters Committee  
Room 231 House Office Building  
6 Bladen Street  
Annapolis, Maryland 21401

**Re: Support of amendments for Senate Bill 418 — Maryland Energy Administration — Energy and Water Efficiency Standards — Alterations**

Dear Chairman Davis and Madam Vice Chair Dumais:

This bill, relating to the establishment of certain energy efficiency standards through the adoption of regulations, provides for energy efficiency requirements for a number of appliances used by the citizens of Maryland and is supported by the Pool & Hot Tub Alliance (PHTA). By requiring minimum efficiencies, this bill will save consumers and businesses money on their utility bill at the same time decreasing energy consumption and reducing greenhouse gases.

With regard to the portable spa provisions in this bill, we support the proposed amendments, which are consistent with what is used within the industry and in other state and national standards. We fully support the requirement to have Maryland portable spas meet the latest edition of the ANSI/APSP/ICC-14 Standard for Portable Electric Spa Energy Efficiency. This standard has been adopted by over 21 states through either the adoption of the International Pool and Spa Code (ISPSC) or by appliance energy efficiency legislation similar to what Maryland is considering in SB 418.

Currently, the Maryland General Assembly is also considering HB 109 and SB 254 which would adopt the ISPSC, which references this same APSP-14 Standard and therefore align with the intent of this piece of legislation. Additionally, at least 10



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additional state legislatures have either filed or will file legislation to adopt the Portable Electric Spa Energy Efficiency APSP-14 Standard in 2021. To ensure consistency with what is required within this standard and a higher compliance rate, we strongly support its inclusion into statute via this legislation.

On behalf of the many Maryland pool and spa professionals represented by PHTA, as well as those in neighboring states that do business in Maryland, we respectfully request that you consider moving this important legislation out of your committee.

Sincerely,



Jason Davidson

PHTA, Director of Government Relations

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#### About Us

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 the 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 and local levels, to consumer outreach and public safety. PHTA is the only industry organization recognized by the American National Standards Institute to develop and promote national standards for pools, hot tubs, and spas. For more information, visit [PHTA.org](http://PHTA.org).



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