



January 23, 2018

Submitted Via Email To:

Representative Stephen Carr
Chair, House Committee on Energy and Technology

Rep Curtis McCormack
Vice Chair, House Committee on Energy and Technology

Representative Marcia Gardner, H. 410 sponsor

cc: Mike Bailey, Energy & Technology Committee

RE: SUPPORT of H.410, An act relating to adding products to Vermont's energy efficiency standards for appliances and equipment

Dear Chairmen:

The Association of Pool & Spa Professionals (APSP) represents 3,300 company members nationwide. We write in support of and urge favorable action on H. 410.

1. ABOUT THE SUBMITTING ORGANIZATION

APSP 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, APSP 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.

APSP 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 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. These standards are used in the design, operation, and maintenance of swimming pools.

The APSP 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 in all or parts of over 20 states. APSP is also represented on and participates in various other standards-making organizations promulgating standards including the ICC, International Association of Plumbing and Mechanical Officials (IAPMO), American Society of Testing and Materials (ASTM1551), and the National Electrical Code®. In addition, the APSP

provides educational programs and monitors the accredited continuing education requirements for various licensing programs for aquatics professionals.

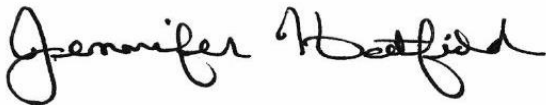
2. COMMENTS ON HOUSE BILL 410

H. 410, An act relating to adding products to Vermont's energy efficiency standards for appliances and equipment, provides for energy efficiency requirements for a number of appliances used by the citizens of Vermont. 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 definition being proposed for a portable spa, which is consistent with what is used within the industry and in other state and national standards. We also support the requirement to have those portable spas meet the ANSI/APSP/ICC-14 Standard for Portable Electric Spa Energy Efficiency (2014 edition). This standard has been adopted by over 20 states by the adoption of the International Swimming Pool & Spa Code or by state laws such as this bill currently being considered. 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 Vermont pool and spa professionals represented by APSP, as well as those in neighboring states that do business in Vermont, we respectfully request that you consider moving this important bill out of your committee.

Sincerely,



Jennifer Hatfield
APSP Government Affairs Director
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