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The Global Source and Voice for the Recreational Water Industry

DOCKET
08-AAER-1B

DATE OCT 13 2008

RECD. OCT 14 2008

October 13, 2008

RE: PG&E Comments on Title 20 45-Day Language for Portable Electric Spas (dated October 8, 2008),
Docket No. 08- AAER-1-B

The Association of Pool & Spa Professionals (APSP) is the world's largest international trade association representing the swimming pool, spa and hot tub industry. APSP's mission is ensuring consumer safety and enhancing the business success of its members. Members adhere to a code of business ethics and share a commitment to public health and safety in the use of pools, spas and hot tubs. APSP member companies include manufacturers, distributors, manufacturers' agents, designers, builders, installers, retailers, and service professionals.

APSP supports energy efficiency and understands the need for consistent repeatable test method of portable electric spas. APSP sponsored and organized the development of a new test facility at Cal Poly San Luis Obispo and tested a variety of spas in 2008.

APSP has been working collaboratively with PG&E to provide industry input and feedback on the Title 20 clarifications for portable electric spas. APSP has reviewed PG&E's comments to the CEC dated October 8, 2008. On behalf of APSP and its members, I formally state that APSP supports and approves PG&E's proposed clarifications, with the exception of the spa volume definition in Section 1604(g)(2)(B). Additional feedback from APSP members revealed that this definition needs to be clearer. APSP recommends that it is changed so it reads:

The spa shall be filled with water to the halfway point between the bottom of the skimmer opening into the tub and the top of the spa. If there is no skimmer basket, the spa shall be filled with water to six inches below the top of the spa.

This definition clarifies that the bottom measurement point is the bottom of the skimmer opening where the water flows into the tub, not the bottom of the skimmer basket opening which can be several inches deep into the filter canister.

(For reference, PG&E's comments dated October 8, 2008, say: The spa shall be filled with water to the halfway point between the bottom of the skimmer basket opening and the top of the spa. If there is no skimmer basket, the spa shall be filled with water to six inches below the top of the spa.)

APSP has already brought this to PG&E's attention and has PG&E's support of this change. Since PG&E has already submitted their comments, APSP expects PG&E to recommend this change at the CEC hearing on October 22, 2008.

If you have questions or need to contact me for any reason, please contact the undersigned.



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