



## GAMA-An Association of Appliance & Equipment Manufacturers

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### Product Divisions and Groups

Burner  
Controls  
Corrugated  
Stainless Steel  
Tubing  
Direct Fired  
Heater  
Direct Heating  
Food Service  
Equipment  
Fuel Cell  
Furnace  
Gas Appliance  
Connector  
Gas Detection  
and Analysis  
Gas Equipment  
& Service  
Gas Venting  
Products  
Hydronics  
Institute  
Industrial Forced-  
Air Heating  
Infrared  
Motor & Blower  
Power  
Generation  
Vent Free Gas  
Products  
Water Heater

May 4, 2007

California Energy Commission  
Docket No. 07-AAER-1  
Docket Unit  
1516 Ninth Street, Mail Station 4  
Sacramento, California 95814-5504

<b>DOCKET</b>	
<b>07-AAER-1</b>	
<b>DATE</b>	MAY 04 2007
<b>RECD.</b>	MAY 04 2007

Re: Docket No. 07-AAER-1; Appliance Efficiency Regulations 15-Day Language

Dear Sir or Madam:

The Gas Appliance Manufacturers Association (GAMA), the national trade association of the U.S. space heating and water heating industries, appreciates the opportunity to comment on the California Energy Commission's (CEC) 15-Day Language of proposed amendments to its Title 20 appliance efficiency regulations. Our comment concerns Section 1606 (b)(2)(A) which provides 30 days for the Executive Director to approve or disapprove manufacturer statements filed through a third party such as GAMA Certification Services.

We believe that the time period for the Executive Director to notify manufacturers as to the acceptability of data submitted by a third party should be reduced to not longer than 14 days, which is the same time period specified when the manufacturer files the data electronically. This proposed amendment is a disincentive for a manufacturer to report to the CEC via a third party such as GAMA Certification Services because it would take longer to obtain CEC approval and get the product into distribution to sell in California. The same time periods should apply whether the manufacturer files directly or through a third party. We think it is in the CEC's best interest not to discourage manufacturers from reporting to the CEC via a third party such as GAMA Certification Services.

Recognizing that third party submitters such as GAMA will have to be approved by the CEC and that such approval will likely include a review of the process by which the third party accepts data, we would further suggest that the notification period in Section 1606 (b)(2)(A) could be shortened to a matter of days. We believe that this suggestion can be better appreciated once the system of data collection and processing has been reestablished and we would like to discuss this further with the staff.

Respectfully Submitted,

Frank A. Stanonik  
Chief Technical Advisor

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