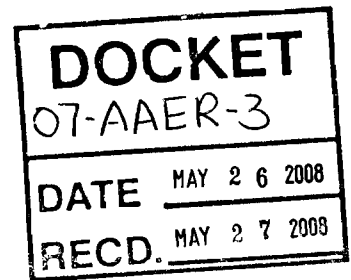


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Re: Docket # 07-AAER-3  
Jackalyne Pfannenstiel and Arthur Rosenfeld,

May 26, 2008

Thank you for the opportunity to speak on the issue of the proposed clarification presented by PG&E. Despite Mr. Fernstrom's opening remarks where he characterized our association (IPSSA), as being scattered with many differing opinions and his questioning whether I was bringing a resolution from the association, I reaffirm to you that I had and have the unanimous voice of all ten (10) elected Regional Directors of the Independent Pool and Spa Service Association. The IPSSA Directors believe that on existing pools, it is important to have the ability to provide a direct replacement motor, which will function at maximum efficiency on that pool. It could be a two speed or a two speed may not be appropriate for that pool. The regulation should not make this critical decision; a pool professional should make the informed decision.

We at IPSSA have only recently voiced our opposition to this clarification as we believed that these new rules would apply to new pool construction and remodels and it makes sense to design a pool to be the most efficient it can be. Once built, we the service technicians maintain the pool with energy conservation in mind. We run the pumps at off peak hours and run the pumps a minimum amount of time as the need of the pool dictates. We support the current language regarding replacement motors of existing pools.

Mr. Fernstrom's estimates do not seem to take into account the number of circulation pumps and/or motors that have already been downsized for efficiency. If one assumes that all pools are running at 8 hours per day and are 1.5 to 2 hp then the energy savings would indeed be huge. However, our industry has spent years trying to lower our client's electric bills by installing energy efficient pumps and motors.

One issue that was not brought up in the hearing was how can we stop the inflow of non-energy efficient motors and pumps from the internet.

Thank you again for your time and thoughtful consideration of this matter,

Michael Gardner  
IPSSA Region I Director