



DOCKET

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CEC,

October 8, 2008

RE: Docket No. 08-AAER-1-B
PG&E Comments on Title 20 45-Day Language for Portable
Electric Spas

Watkins Manufacturing, producer of a number of spa models and brands, has reviewed the recommended language changes for Title 20, Cal. Code Regs., §§ 1601 – 1608. Watkins Manufacturing believes that the changes will remove ambiguity from the test protocol while allowing for reproducibility in the results. The CEC appliance database of spa energy consumption will be from user bias by the establishment of defined volumes and normalized test temperatures.

Watkins Manufacturing approves with the proposed changes.

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