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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

Freeflow Spas is a manufacturer of above ground, portable hot tubs/spas located in Ontario, California. We will produce roughly 2500 hot tubs in 2008 of which around 35% are sold in the State of California.

As a participant in the APSP/PG&E effort to provide feedback on the Title 20 clarifications for portable electric spas, we hereby approve of and support PG&E's proposed clarifications with the exception of the definition of spa volume in Section 1604(g)(2)(B). We believe the suggested recommendations by APSP would be a much more accurate and sensible description than the current language which simply makes no sense & in fact, if followed to the letter, would render a spa unusable. It is our understanding that PG&E has supported the proposed APSP change in this language.

If you have any questions or comments, please contact me.

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