



December 2, 2008

Ms. Jackalyne Pfannenstiel  
Chairman and Associate Member, Efficiency Committee

Mr. Arthur Rosenfeld  
Commissioner and Presiding Member, Efficiency Committee

California Energy Commission  
Buildings and Appliances Office  
1516 Ninth Street, MS-25  
Sacramento, CA 95814-5512

<b>DOCKET</b>	
<b>08-AAER-1B</b>	
DATE	DEC 02 2008
RECD.	DEC 02 2008

**Subject: PG&E Comments on Title 20 15-Day Language for Battery Charger Systems Test Procedure ;**  
**2008 Appliance Efficiency Rulemaking, Phase I, Part B**  
**Docket Number 08-AAER-1B**

Dear Ms. Pfannenstiel and Mr. Rosenfeld:

Pacific Gas and Electric (PG&E) recommends that the CEC adopt the Test Procedure for Battery Charger Systems as described in the current 15-day language (docket number 08-AAER-1B). PG&E and its consultant Ecos Consulting, having closely reviewed the *Energy Efficiency Battery Charger System Test Procedure Version 2.2*, recommend the following typo/clarifying corrections be made to the test procedure under the administrative provisions allowed by the Commission during the 15-day language period for rulemaking.

The following typo/clarifying corrections are recommended:

1. Page 26, Part 2 Section II.C, 4<sup>th</sup> and 5<sup>th</sup> line in first paragraph the phrase “by driving or other means of discharge” should be deleted. The new sentence should read: “The battery shall be depleted to roughly 80% depth of discharge...”
2. Page 26, Part 2 Section II.C, 6<sup>th</sup> line in first paragraph the word “three” should be replaced with “two”. The new sentence should read: “Do this two times.”
3. Page 28, Part 2 Section III.A 1, items 1, 2, 3 should be moved to page 29, Part 2 Section III.A 2, in between items 23 and 24, and the word “Starting” should be replaced with “End” in item 1.
4. Page 32, Part 2 Section III.C, item 5, “Note:” should be deleted.

Sincerely,

Patrick Eilert  
Program Manager, Codes and Standards  
Pacific Gas & Electric Company