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**08-AAER-1B**

DATE OCT 14 2008

RECD. OCT 15 2008

October 14, 2008

Subject: PG&E Comments on Title 20 45-Day Language for Portable Electric Spas (dated October 8, 2008);

Reference: Document No. 08-AAER-1-B

MAAX Spas Industries Corporation is an international manufacturer of several brands of spas, including; Nahanni®, Elite Spas®, California Cooperage®, MAAX Spas® and MAAX Collection®. MAAX Spas Industries Corporation has been in the spa manufacturing industry since 1977.

MAAX Spas Industries Corporation in cooperation with APSP has assisted in the testing and evaluation of the Title 20 Section 1604(g)(2)(B) standard. MAAX Spas Industries supports a consistent and repeatable test method for energy efficiency of portable spas.

After reviewing PG&E comments on the Title 20, 2008 rulemaking on Appliance Efficiency Regulations MAAX Spas Industries Corporation formally supports and approves PG&E's proposed comments. In addition MAAX Spas Industries supports APSP's recommendation to the spa volume definition in Section 1604(g)(2)(B) as purposed in the APSP's response to PG&E dated October 13, 2008.

Sincerely,

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MAAX Spas Industries Corporation  
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