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Docket Number: 22-AAER-05*

**ASAP CFA NCLC Water Closet Standards RFI Comments**

*Additional submitted attachment is included below.*

Appliance Standards Awareness Project  
Consumer Federation of America  
National Consumer Law Center

May 5, 2026

Jessica Lopez  
California Energy Commission  
Docket Unit  
715 P Street, Sacramento, CA 95814

**RE: Docket No. 22-AAER-05: Appliance Efficiency Regulations for Water Closets**

Dear Jessica Lopez:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), Consumer Federation of America (CFA), and National Consumer Law Center (NCLC), on behalf of its low-income clients, on the California Energy Commission (CEC) request for information (RFI) for standards for water closets (toilets). We appreciate the opportunity to provide input to the Commission.

**We support the Commission’s near-term plan for water closets.** The CEC's near-term proposal for water closets takes a more incremental approach than the proposal in the 2024 draft Staff Report,<sup>1</sup> yet Staff estimates that it would yield 2.9 billion gallons in annual water savings after full stock turnover.<sup>2</sup>

For dual-flush tank-type toilets, the RFI proposes replacing the effective flush volume standard with separate maximum flush standards—1.28 gallons per flush (gpf) full and 0.9 gpf reduced.<sup>3</sup> The Commission is also considering similar changes for non-tank-type dual-flush toilets that align with WaterSense. More broadly, the Commission is proposing updated performance testing criteria to align with WaterSense, improved test lab reporting requirements, and Modernized Appliance Efficiency Database System (MAEDbS) updates to better categorize water closet types.<sup>4</sup>

Finally, the RFI proposes labeling requirements for dual-flush water closets aimed at increasing consumer use of the reduced flush; these requirements aim to bridge the gap between theoretical water savings and realized water savings.<sup>5</sup>

**We encourage the Commission to continue to consider more stringent future standards for water closets.** In the RFI, the Commission outlines three potential long-term pathways to drive more significant water savings: reducing the single-flush standard from 1.28 gpf to a maximum of 1.1 gpf, requiring all water closets sold in California to be dual-flush, or updating standards for water closets in the residential building code. The RFI estimates that the potential annual water savings from the first

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<sup>1</sup> [efiling.energy.ca.gov/GetDocument.aspx?tn=259915&DocumentContentId=96120](https://efiling.energy.ca.gov/GetDocument.aspx?tn=259915&DocumentContentId=96120)

<sup>2</sup> pp. 3-4. [efiling.energy.ca.gov/GetDocument.aspx?tn=269259&DocumentContentId=106336](https://efiling.energy.ca.gov/GetDocument.aspx?tn=269259&DocumentContentId=106336)

<sup>3</sup> *Ibid.*

<sup>4</sup> pp. 4-6. *Ibid.*

<sup>5</sup> p. 6. *Ibid.*

two options range from 11.6 to 23.5 billion gallons.<sup>6</sup> We support the Commission's efforts to pursue these potential future pathways that could achieve much larger water savings.

Thank you for considering these comments.

Sincerely,



Jeremy Dunklin, PhD  
Senior Technical Advocacy Associate  
Appliance Standards Awareness Project



Karim D. Marshall  
Director of Climate and Energy Policy  
Consumer Federation of America



Berneta Haynes  
National Consumer Law Center  
(On behalf of its low-income clients)

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<sup>6</sup> pp. 7-8. *Ibid.*