

## DOCKETED

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<b>Project Title:</b>	Appliance Efficiency Rulemaking for kitchen faucets, tub spout diverters and showerheads
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*Comment Received From: Matt Sigler*

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## **Plumbing Manufacturers International's (PMI) Comments**

Please refer to the attached letter.

*Additional submitted attachment is included below.*



December 2, 2015

Docket Unit  
California Energy Commission  
Docket No. 15-AAER-07  
1516 9th Street, MS-4  
Sacramento, CA 95814

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**RE: DOCKET #15-AAER-07 Appliance Efficiency Rulemaking for Kitchen Faucets, Tub Spout Diverters and Showerheads**

Dear Commissioners:

Plumbing Manufacturers International (PMI) is an international, U.S.-based trade association representing 90% of plumbing products sold in the United States. It has made the promotion of water efficiency and safety a top priority and has included it in its mission statement.<sup>1</sup> PMI's members are industry leaders in producing safe, reliable and innovative water efficient plumbing technologies and have supported water efficiency legislation and codes in California, as well as the voluntary US EPA WaterSense® program.

PMI supports the proposed revisions to the appliance efficiency regulations that would limit the scope of kitchen faucets to residential faucets. As stated in the background paper in this docket, *"Kitchen faucet savings will not be reduced because staff did not consider savings from commercial faucets in the original rulemaking."* This is also a sound clarification considering that commercial kitchen faucets typically require flow rates greater than 1.8 gpm in order to meet the demands of a busy commercial kitchen. These faucets are typically used for rapid filling of vessels and containers for food preparation and cooking. In addition, large multi-compartment commercial sinks may require filling of one or several compartments with hot water for sanitizing per the FDA Food Code. Rapid filling helps to reduce thermal loss and minimize energy waste. However, we believe if the intent of the recommendation is to exempt commercial kitchen faucets, then the text *"kitchen faucets that are consumer products"* should be replaced with *"residential kitchen faucets."* This is due to the fact that the definition for "consumer product" contained in the 2015 Appliance Efficiency Regulations states:

***"(2) without regard to whether such article of such type is in fact distributed in commerce for personal use or consumption by an individual, except that such term includes fluorescent lamp ballasts, general service fluorescent lamps, incandescent reflector lamps, showerheads, faucets, water closets, and urinals distributed in commerce for personal or commercial use or consumption."***

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<sup>1</sup>PMI's Mission: To promote the water efficiency, health, safety, quality and environmental sustainability of plumbing products while maximizing consumer choice and value in a fair and open marketplace. To provide a forum for the exchange of information and industry education. To represent openly the members' interests and advocate for sound environmental and public health policies in the regulatory/legislative processes. To enhance the plumbing industry's growth and expansion.

PMI would like to take this opportunity to point out our concerns with other proposed revisions that could cause compliance issues for manufacturers. Beginning with the proposed changes to Section 1604 (h)(2)(A) and Section 1604 (h)(3). First, the current reference to 10 C.F.R. Section 430.23(t) is correct for determining the maximum flow rate of showerheads and should not be changed. Second, wash fountains are not referenced in 10 C.F.R. Section 430.23(s), and should not be referenced as such within the appliance efficiency regulations. PMI respectfully requests CEC to revise these references accordingly for consistency with U.S. Department of Energy (DOE) regulations.

Furthermore, PMI is concerned about the reference to Sections 7.4.2 and 7.4.3 of ASME A112.18.1M-1996 for tub spout diverters as this standard was replaced with the harmonized standard ASME A112.18.1/CSA B125.1 in 2005, with the latest version of the harmonized standard being dated 2012. CEC's concern about a less stringent requirement where utilizing a minimum pressure of 20 psi versus 10 psi is not based on fact. The reason the pressure was changed in the harmonized standard is that the CSA B125.1 standard required a minimum pressure of 10 psi for testing which was more stringent than the 20 psi pressure required in ASME A112.18.1M. The reason a minimum testing pressure of 10 psi is more stringent is because it requires a more robust design to keep the diverter in the up position than at 20 psi. At 20 psi, if the diverter is installed in a lower pressure situation it could leak more as the diverter would not completely shut-off the tub spout when activating the showerhead. Additionally, a reference to ASME A112.18.1/CSA B125.1-2012 would be consistent with other up-to-date standard references made throughout the appliance efficiency regulations such as ASME A112.18.1/CSA B125.1-2012 for showerheads and ASME A112.19.2/CSA B45.1-2013 for the waste extraction test used for water closets. Finally, what does the text "*highest measured leakage rate*" mean? PMI urges the CEC to delete in its entirety the text in Section 1604(h)(5) and replace with the following: "*A bath and shower diverter shall be tested in accordance with ASME A112.18.1/CSA B125.1-2012, Section 5.3.6 for the rate of leakage conducted prior to life cycle testing and Section 5.6.1.5 for the rate of leakage conducted after life cycling testing.*"

Finally, PMI supports keeping the text of footnote 2 of Table H-5 as currently written. PMI believes that the term "*measured*" should not be added as the language would no longer be consistent with the WaterSense® Specification for Showerheads. Additionally, the term "*measured*" is subjective to interpretation, and is not supported by other standards or regulations utilized throughout the industry. Furthermore, PMI believes it is unnecessary to state "*80 psi*" as Section 1604 (h)(2)(B) of the appliance efficiency regulations already indicates how minimum flow rate is to be tested in accordance with ASME A112.18.1/CSA B125.1-2012, Section 5.12.

In closing, PMI respectfully requests that the CEC consider our proposed revisions to the appliance efficiency regulations. Furthermore, we would like to thank the California Energy Commission for the opportunity to provide comments for the rulemaking being promulgated for Title 20 through Docket No. 15-AAER-07 for kitchen faucets, tub spouts diverters and showerheads. Our partnership with the regulatory and stakeholder communities in the State of California will continue to promote water efficiency that will produce safe, sanitary, efficient and reliable plumbing products.

Sincerely,



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