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Comment Received From: Peter DeMarco
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RE: DOCKET #15-AAER-07 - Appliance Efficiency Rulemaking for Kitchen Faucets, Tub Spout Diverters and Showerheads

Additional submitted attachment is included below.

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December 3, 2015

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

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

Dear Commissioners:

The International Association of Plumbing and Mechanical Officials (IAPMO) is the developer of the Uniform Plumbing Code, the Uniform Mechanical Code, the Uniform Solar Energy Code, the Uniform Swimming Pool, Spa and Hot Tub Code and the Green Plumbing and Mechanical Code Supplement. IAPMO codes and product standards are developed employing an ANSI accredited open consensus development process and are published as American National Standards. IAPMO R&T, a division of IAPMO, is an ANSI accredited third-party certification agency and the largest certifier of plumbing products in North America.

Regarding the subject docket, IAPMO is writing in support of the comments submitted to the Commission by the Plumbing Manufacturers International (PMI). As an independent third party certification provider and a developer of safe and effective codified water efficiency provisions, IAPMO is uniquely qualified to comment on the technical merits of the regulations currently under consideration. Specifically, IAPMO supports the following recommendations:

- IAPMO supports the proposed revisions to the appliance efficiency regulations that limit the scope of the flow rate provisions for kitchen faucets to residential faucets only. Commercial faucets are clearly intended for use in restaurants and other commercial kitchens where the fast filling of pots and other containers is a prime consideration. Clearly, flow rates greater than 1.8 gpm are required to meet the needs of a commercial kitchen and the Commission is correct to recommend that the flow rate provisions apply explicitly to residential kitchen faucets only. For clarity, IAPMO supports the recommendation that the text “kitchen faucets that are consumer products” be replaced with “residential kitchen faucets.”

- IAPMO further agrees with PMI that 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. Further, wash fountains are not referenced in 10 C.F.R. Section 430.23(s), and should not be referenced within the appliance efficiency regulations. IAPMO recommends that the CEC revise these references in accordance with U.S. Department of Energy (DOE) regulations.

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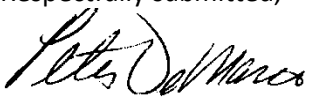
- Regarding tub spout diverters; PMI correctly notes that ASME A112.18.1M-1996 was replaced with the publication of harmonized standard ASME A112.18.1/CSA B125.1 in 2005. The current edition of this standard is ASME A112.18.1/CSA B125.1 – 2012 and the provisions contained within the current edition represent the most comprehensive and well-considered test methods for tub spout diverters for inclusion into the Commission's regulations. IAPMO recommends that the CEC delete 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."

- PMI's commentary to the Commission stating that a minimum pressure of 10 psi for leakage testing is more stringent than the 20 psi pressure required in ASME A112.18.1M – 1996 is absolutely correct. A lower test pressure results in less backpressure being applied to the diverter mechanism when the diverter is activated. As a result, a more efficient and durable design is required to meet the leakage provisions as specified in the current industry standard.

- IAPMO further agrees with PMI regarding their recommendation to retain the text of footnote 2 of Table H-5 as currently written. It is unclear what is gained by adding the term "measured" to the regulation as this creates a needless and potentially confusing inconsistency with the US EPA's WaterSense® Specification for Showerheads.

As the developers of the Uniform Plumbing Code, IAPMO remains committed to providing commentary to the Commission that supports the enactment of sound water efficiency regulations that work to provide for meaningful water conservation gains while also avoiding the unintended consequences of water efficiency that have potential to compromise health and safety or plumbing system efficacy. Please contact me regarding any questions the Commission may have regarding the above comments.

Respectfully submitted,



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