

DOCKETED

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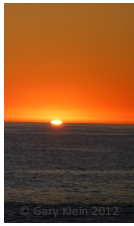
Comment Received From: Gary Klein

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Second Set of Comments

Additional submitted attachment is included below.



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September 18, 2017

Ryan Nelson
California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: DOCKET NO. 17-AAER-09 TUB SPOUT DIVERTERS

Dear Mr. Nelson:

This letter is to add to my comments filed on August 17, 2017.

1. The development of a test procedure that is representative of the actual causes of leakage in tub spout diverters is an important next step toward minimizing the waste of water during shower events.
2. The proponents of reducing tub spout diverter waste should investigate the causes of leakage and, then, based on their findings, develop a test procedure to measure this in a controlled setting.
3. In addition to saving the energy related to the hot water waste, getting such a revised test into the ASME procedures that are used for plumbing fixture fittings sold throughout the US should be another goal of the Energy Commission in this effort so that the new test becomes part of the normal processes of the industry, instead of an extra process for California.
4. I believe that manufacturers of tub spout diverters should be included as part of the research project to identify the causes of leakage in existing situations and also be included in the development of test procedures. Their insights into product operation and construction should prove helpful to the overall effort.
5. In addition, the more involved the manufacturers are in this effort to help California understand the unintended waste in diverters, the more comfortable they will be with any proposal to modify the ASME test procedures. In fact, if they are brought into the process early on, they might even be supportive of such a proposal. I believe it is worth finding out.

Thank you for your efforts to reduce hot water consumption. I firmly believe that doing so can be achieved while simultaneously improving bather comfort and convenience. I look forward to discussing this opportunity further with the California Energy Commission.

Best Regards,

A handwritten signature in black ink that reads "Gary Klein". The signature is written in a cursive, flowing style. Below the signature, the name "Gary Klein" and the title "President" are printed in a standard font.

Gary Klein
President