

DOCKETED

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Project Title:	Amendments to Title 20 Appliance Efficiency Regulations Rulemaking
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Plumbing Manufacturers International (PMI) - Docket 18-AAER-10 Comments

Please refer to attachment for PMI's comments

Additional submitted attachment is included below.



May 9, 2018

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

RE: DOCKET NO. 18-AAER-10

Dear Mr. Baez:

**PMI Board of
Directors**

Peter Jahrling,
Sloan Valve Company
President

Nate Kogler
Bradley Corporation
Secretary-Treasurer

Paul Patton,
Delta Faucet Company
Immediate Past
President

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LSP

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Moen, Incorporated

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Kohler Co.

Chip Way
Lavelle Industries, Inc.

Plumbing Manufacturers International (PMI) appreciates this opportunity to provide comments to the California Energy Commission (CEC) regarding Docket No. 18-AAER-10. PMI is an international, U.S.-based trade association representing manufacturers that provide 90% of the plumbing products sold in the United States. We have made the promotion of water safety and efficiency a top priority and have included this in our mission statement¹.

On April 30th, the CEC announced the following proposed actions pertaining to California Code of Regulations, Title 20, Sections 1601 to 1609 (Appliance Efficiency Regulations) that would not change the underlying energy and water efficiency standards for any appliance:

- (1) update provisions to reflect current federal law,
- (2) change state-specific requirements,
- (3) update the appliance certification procedures to reflect the current use of a new electronic database system,
- (4) update the appliance data submittal requirements, and
- (5) improve the readability of the regulations.

PMI supports the CEC in their objectives of updating Title 20, and would like to offer the following comments for consideration regarding the proposed regulatory language:

- On page 217, Section 1605.3(h)(4)(A), the cleanability requirement that is referenced in this section is not referenced in ASTM F2324-13. Additionally, the methods referenced in C.F.R. section 431.264 (that is referenced in Section 1604(h)(1) of Title 20) pertain to measuring flow rate and spray force, and not cleanability. Finally, both the U.S. Department of Energy and EPA WaterSense utilize a spray force test in place of a cleanability test. PMI proposes the following revision:

¹PMI'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.

(4) Commercial Pre-rinse Spray Valves.

(A) Commercial pre-rinse spray valves manufactured on or after January 1, 2006, shall ~~be~~ capable of cleaning 60 plates in an average time of not more than 30 seconds per plate have a minimum spray force of not less than 4.0 ounces-force (ozf) [113 grams-force (gramf)].

- On page 218, Section 1605.3(i)(2), the industry standard for ceramic plumbing fixtures has been harmonized with Canada. PMI proposes the following revision that will correlate with the CEC proposed change on page 239:

2) Water closets sold or offered for sale on or after January 1, 2016, shall pass the Waste Extraction Test (Section 7.10) of ASME A112.19.2/CSA B45.1.

PMI welcomes questions from the Commission about our comments regarding Docket No. 18-AAER-10. We look forward to working with the CEC during the rulemaking process to promote water efficiency that will produce safe, sanitary, efficient and reliable products.

Sincerely,



Matt Sigler
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Plumbing Manufacturers International
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cc: PMI Board of Directors