

DOCKETED

Docket Number:	21-AAER-01
Project Title:	Appliance Efficiency Regulations for Dipper Wells
TN #:	259960
Document Title:	Appliance Standards Awareness Project Comments - ASAP Dipper Wells RFI Comments
Description:	N/A
Filer:	System
Organization:	Appliance Standards Awareness Project
Submitter Role:	Other Interested Person
Submission Date:	11/8/2024 2:06:08 PM
Docketed Date:	11/8/2024

*Comment Received From: Appliance Standards Awareness Project
Submitted On: 11/8/2024
Docket Number: 21-AAER-01*

ASAP Dipper Wells RFI Comments

Additional submitted attachment is included below.

Appliance Standards Awareness Project

November 8, 2024

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

RE: Docket No. 21-AAER-01: Appliance Efficiency Regulations for Dipper Wells

Dear Ms. Lopez:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) on the California Energy Commission (CEC) request for information (RFI) for dipper wells. We appreciate the opportunity to provide input to the Commission.

We are pleased that CEC is moving forward with the rulemaking for dipper wells. Continuous dipper wells can consume large amounts of water and energy, with some installations consuming nearly 180,000 gallons of water and over 1,000 therms of natural gas annually.¹ Setting a maximum allowable flow rate for continuous dipper wells would meaningfully reduce water and energy consumption, while potentially encouraging market adoption of more efficient alternatives to continuous dipper wells.² We support the draft terms and definitions defining dipper well and various dipper well types that were developed in conjunction with the dipper well workgroup.³ We also support using the draft test method to measure flow rate for continuous dipper wells created jointly with the workgroup, which is based on the industry test standard ASME A112.18.1.

We believe that setting a maximum flow rate for continuous dipper wells is unlikely to cause issues with local health codes. We understand that health codes in California do not have specific sanitation requirements for dipper wells and there are no existing minimum flow rate requirements for dipper wells. Based on feedback from California health code officials discussed in the RFI, inspectors are generally only looking to see that utensils are not being held in dirty, stagnant water.⁴ Further, the RFI notes that CEC expects that many California jurisdictions will soon adopt the 2024 Appendix L requirements in the 2024 IAPMO Uniform Plumbing Code,⁵ which set a maximum flow rate for continuous dipper wells at 0.2 gpm.⁶ Thus, we do not anticipate that CEC specifying a maximum flow rate (e.g., 0.2 gpm) for dipper wells would cause significant market disruptions. Finally, for installations where a low flow rate may cause sanitation concerns, there are several cost-effective alternatives to continuous dipper wells available on the market today.⁷

¹pp. iv-v. www.bewaterwise.com/assets/2015icp-dipperwellfrontierenergy.pdf

²For example: batch (non-continuous) dipper wells using heated sanitation, ozone cleaning, and/or turbidity sensing; high pressure water jet devices or faucets; undercounter dishwashers.

³Attachment A, p. 7. efiling.energy.ca.gov/GetDocument.aspx?tn=259263&DocumentContentId=95350

⁴Attachment C, pp. 10-13. efiling.energy.ca.gov/GetDocument.aspx?tn=259263&DocumentContentId=95350

⁵p. 3. efiling.energy.ca.gov/GetDocument.aspx?tn=259263&DocumentContentId=95350

⁶Appendix L, Section 404.6, p. 415. Dipper Well Faucets. epubs.iapmo.org/2024/UPC/

⁷pp. 5-6. efiling.energy.ca.gov/GetDocument.aspx?tn=241424&DocumentContentId=75379

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink that reads "Jeremy Dunklin". The signature is written in a cursive, flowing style.

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