

DOCKETED	
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Docket Number: 22-AAER-05

CEC - Docket 22-AAER-05, Water Closets, PMI Request for Extension (2024-11-12)

Additional submitted attachment is included below.



November 12, 2024

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California Energy Commission
Docket No. 22-AAER-05
715 P Street
Sacramento, CA 95814

RE: Request to Extend the Public Comment Deadline – 60-day Pre-Rulemaking Comment Period for Water Closets Proposed Standards – Docket No. 22-AAER-05

Dear Commissioners:

On behalf of Plumbing Manufacturers International (PMI), we respectfully request a 60-day extension of the comment deadline for the California Energy Commission's Docket No. 22-AAER-05, 60-day Pre-Rulemaking Comment Period for Water Closets Proposed Standards, published on November 6, 2024. We propose extending the deadline from January 6, 2025, to March 7, 2025.

The Staff report is comprehensive and proposes updates to terms and definitions, performance criteria, test lab reporting, and certification requirements to support the new efficiency standards. Reviewing and analyzing these provisions will require significant effort. We are requesting this extension to allow adequate time for a thorough review and analysis, to discuss our feedback with PMI members, and to account for practical challenges related to the timing of the CEC notice. The 60-day comment period includes four federal holidays—Veterans Day (Nov 11), Thanksgiving (Nov 28), the day after Thanksgiving (Nov 29), Christmas (Dec 25), and New Year's Day (Jan 1)—when many individuals plan extended family vacations. As a result, stakeholders, including PMI, may need to either ask members to delay personal plans to participate or limit our feedback to meet the deadline.

PMI is the nation's leading trade association for the plumbing fixtures and fittings manufacturing industry. Our members produce 90 percent of all plumbing products in the United States and represent more than 150 brands. PMI's members are industry leaders in producing innovative, reliable, and water-efficient plumbing products and related supplies.

PMI looks forward to your consideration of our request for extension and to participating in this request for information and invitation to submit proposals. Please do not hesitate to contact us if you have any questions or need further information. Thank you for considering our request.

Sincerely,



Kyle Thompson
Technical Director
Plumbing Manufacturers International
Office: 847-217-7212
kthompson@safep plumbing.org

cc: Members

PMI Members

*Blanco *BOCCHI *Bradley Company, LLC *Brasscraft Manufacturing Company *CSA Group Testing & Certification, Inc. *Delta Faucet Company
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*Reliance Worldwide Corporation *Sloan Valve Company *Sprite Industries *Symmons Industries, Inc. *T & S Brass and Bronze Works, Inc. *TOTO USA *UL *Uponor
*Viega, LLC *Waterpik, Inc. *WCM Industries, Inc. *Zurn Elkay Water Solutions