

## DOCKETED

<b>Docket Number:</b>	15-WATER-02
<b>Project Title:</b>	WaterSaver Idea Exchange
<b>TN #:</b>	204532
<b>Document Title:</b>	Shabbir Rawalpindiwala Comments: Kohler Company Comments related to Docket # 15-WATER-02
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Shabbir Rawalpindiwala
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	5/7/2015 1:11:57 PM
<b>Docketed Date:</b>	5/7/2015

*Comment Received From: Shabbir Rawalpindiwala*

*Submitted On: 5/7/2015*

*Docket Number: 15-WATER-02*

**Kohler Company Comments related to Docket # 15-WATER-02**

Please find attached Kohler Company's comments related to Docket # 15-WATER-02.

Thank you,

Shabbir Rawalpindiwala

Manager Codes & Standards - Kohler Company

*Additional submitted attachment is included below.*



May 7, 2015

To Whom It May Concern:

Kohler Company understands the water crisis that California is currently facing, and we have supported many of the actions the State and California Energy Commission (CEC) have taken in the past to preserve this valuable resource. We believe that in order to ensure that there is sufficient water available for future generations, all Californians should be empowered to make positive changes to help reduce their consumption of water.

Kohler Company is encouraged that Governor Brown's executive order (B-29-15) has allowed CEC to implement a statewide rebate program for the replacement of inefficient plumbing fixtures and fittings. However, beyond the proposed rebates, we would advocate that Governor Brown, the California Legislator, and CEC focus on driving home savings that are already written into law. SB 407, which was authored by then-Senator Alex Padilla, has requirements for replacement of non-efficient products by 2017 for single-family residences and 2019 for multi-family and commercial residences. By moving these requirement dates ahead, California will realize substantial water savings far greater than will be seen by only allowing the sale of 0.125 GPF urinals and 1.2 GPM lavatory faucets. Kohler Company would encourage CEC to tie the forthcoming rebate program to SB 407, by implementing a tiered program which grants greater rebates to those who act now, and lesser or no rebates to those who wait to replace their product.

Industry currently offers efficient toilets, showerheads, faucets, and urinals that are certified to US Environmental Protection Agency's WaterSense program specifications, which provides at least a 20% savings over the US Department of Energy's water consumption requirements. Conservative estimates show that each household could potentially save hundreds of gallons of water per week by simply using WaterSense certified products<sup>1</sup>. Unfortunately, data suggests that WaterSense products are only installed in about 6 percent of California homes<sup>2</sup>. Additional opportunities for water savings exist within the hospitality market in California. According to the American Hotel & Lodging Association there are approximately 500,000 hotel rooms within the state. Assuming one third of those hotel rooms are equipped with non-efficient fixtures or fittings, replacing them with WaterSense products would result in a savings of 4.5 gallons per room, per day<sup>3</sup>. While this may seem insignificant on a per room basis, it would equate to a savings of more than 750,000 gallons of water per day.

We believe that Californians have the ability to save several hundred million gallons of water per day simply by replacing older plumbing products with new, efficient WaterSense fixtures and fittings. As a WaterSense Partner Kohler Company wants to work with Californians to realize these savings immediately. Together we can achieve the much needed water savings that will bridge the gap in water supply during this drought and for years to come.

Sincerely,

A handwritten signature in black ink, reading "Shabbir Rawalpindiwala".

Shabbir Rawalpindiwala  
Manager, Codes & Standards – Kohler Company

<sup>1</sup> [http://www.epa.gov/watersense/our\\_water/how\\_works.html](http://www.epa.gov/watersense/our_water/how_works.html)

<sup>2</sup> Source: Plumbing Manufacturers International (PMI)

<sup>3</sup> Based on WaterSense calculation which assumes 1 resident per room, 1.6 GPF toilets, and not knowing the age of the faucets or showerheads. Total divided by 365 for daily average.