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Docket Number:	15-AAER-04
Project Title:	Toilets, Urinals, and Faucets
TN #:	204763
Document Title:	Comments from Victoria & Albert Baths, Ltd. on Title 20, Sections 1601 through 1608
Description:	N/A
Filer:	Patty Paul
Organization:	Victoria & Albert Baths, Ltd.
Submitter Role:	Public
Submission Date:	5/29/2015 10:52:22 AM
Docketed Date:	5/28/2015

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May 22nd, 2015

Referencing publication: **Appliance Efficiency Regulations, California Code of Regulations Title 20, Sections 1601 Through 1608. Toilets, Urinals, and Faucets Regulations Effective January 1, 2016**

Dear Mr Weisenmiller,

As a relatively new entrant into the faucet market in the USA and Canada we are still learning about all of the regulations in the different regions. We initially launched our products in the USA in 2013 and they were very well received in terms of style and quality. Our flow rates for the lavatory faucets was 2.2gpm and at the time we received feedback from quite a number of retailers requesting that we bring them inline with CAL Green and EPA's Watersense. We in fact went on to reduce their flow rates to 1.5gpm and to fully certify them to CAL Green, IAPMO Green, EPA's Watersense and LEED 2009. This was quite an expense for us and is now beginning to show its worthwhileness.

Being primarily based in the UK, we were unaware of CEC, as can be shown from our lack of existence on the 'Appliance Efficiency Database', this is something we would like to change as we look to explore every possible avenue to increase sales. However it has recently been learned by us that the California Energy Commission is to reduce lavatory faucet flow rates from 2.2gpm to 1.2gpm. This is a huge reduction, 45% in actual fact, which goes beyond that of CAL Green.

We do have an understanding of the droughts that California is facing and the reduction of 'Public lavatory faucets' from 2.2gpm to 0.5gpm is welcomed. These faucets are mainly used as a quick wash of the hands and no more. Minimal water is need and 0.5gpm will suffice. However 1.2gpm for a homeowner faucet is likely to not be enough, especially when they are used to fill containers, to fill the sink etc.

Our fears regarding the reduction of lavatory faucets flow rates from 1.5gpm to 1.2gpm are split:

- Firstly, at 1.2gpm the homeowner could take actions into their own hands and manually look to override the flow limiting device/s we would use. We currently make this task difficult (and according to ASME A112.18.1/CSA B125.1) but anyone determined enough could succeed in removing such flow restricting devices from any faucet. We really feel that there is a danger that we could be inviting the homeowner to attempt this.
- Secondly, as a manufacturer, to make the change to 1.2gpm for California only is a difficult decision for us. We would likely need to split our stock to have all lavatory faucets available in 1.2gpm or 1.5gpm. This would not be possible for us to achieve ahead of January 1, 2016.

In conclusion, whilst we completely agree that there needs continuing action in California to resolve the water droughts, it is felt that heavy restriction on residential lavatory faucets could have a contrasting effect if the homeowner were to manually force the flow restricting device out. It is a difficult task for any sized manufacturer to make these changes in this short time frame.

We will resist making any comments about other ways to reduce water usage other

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than domestic use as we are not in a position to confidently comment on this and are sure these points have been made known to you and are continually in discussions and research.

Yours sincerely



Tom Burke
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cc. Governor Jerry Brown, Sacramento, CA

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