

DOCKETED

Docket Number:	15-AAER-05
Project Title:	Residential Lavatory Faucets and Showerheads
TN #:	205562
Document Title:	Shahin Moinian Comments: Appliance Efficiency Rulemaking for Residential Lavatory Faucets and Showerheads
Description:	N/A
Filer:	System
Organization:	Shahin Moinian
Submitter Role:	Public
Submission Date:	7/30/2015 10:45:30 AM
Docketed Date:	7/30/2015

Comment Received From: Shahin Moinian

Submitted On: 7/30/2015

Docket Number: 15-AAER-05

Appliance Efficiency Rulemaking for Residential Lavatory Faucets and Showerheads

Additional submitted attachment is included below.



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July 30, 2015

Docket Unit
California Energy Commission
Docket No. 15-AAER-01
1516 9th Street, MS-4
Sacramento, CA 95814

RE: DOCKET #15-AAER-05 Appliance Efficiency Rulemaking for Residential Lavatory Faucets and Showerheads

Dear Commissioners:

ICC-Evaluation Service appreciates this opportunity to provide our comments in this proceeding, Docket #15-AAER-05 Appliance Efficiency Rulemaking for Residential Lavatory Faucets and Showerheads.

ICC-Evaluation Service is an independent third party certification organization that works with the manufacturers of plumbing products to certify products that are subject to the emergency regulations adopted by the California Energy Commission on April 8.

We urge the Commission to revise the emergency regulation adopted on April 8 to provide a July 1, 2016 manufacture deadline date for residential lavatory faucets and showerheads to be manufactured in compliance with the new standards.

Together with the provision authorizing retailers and distributors to sell-through noncompliant plumbing products, this presents a workable solution. The July 1, 2016 date is important to our company and our important role in providing product certifications. Our certification process could take approximately 4 months, and even longer if the regulation drives a tremendous volume of certification requests. There are several thousand models of residential lavatory faucets and showerheads.

If you have any questions, or would like any additional information, please feel free to contact me at 562-699-0543 x3559 or smoinian@icc-es.org.

Sincerely,

Shahin Moinian, P.E.
President
ICC-Evaluation Service, LLC