

DOCKETED

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Project Title:	Residential Lavatory Faucets and Showerheads
TN #:	205575
Document Title:	Kyle Krause Comments: State Housing Law Programs comments to Docket No. 15-AAER-05
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Comment Received From: Kyle Krause

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State Housing Law Programs comments to Docket No. 15-AAER-05

Additional submitted attachment is included below.

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS**

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July 30, 2015

VIA email transmission: DOCKET@energy.ca.gov
California Energy Commission
Attention: **Docket No. 15-AAER-05**
Docket Unit
1516 Ninth Street, MS-4
Sacramento, CA 95814

California Energy Commission:

The Department of Housing and Community Development's State Housing Law (SHL) Program, in part, oversees the application of state laws, regulations, and code enforcement by local jurisdictions. The SHL program also develops statewide building standards for residential construction.

The SHL Program has reviewed the Energy Commission's proposed revisions to the Water Appliance Efficiency Regulations, Title 20 of the California Code of Regulations. SHL program has concerns about the following items:

- **Residential lavatory faucets at 1.2 gallons per minute (GPM) beginning January 1, 2016.** HCD is aware of the concern by manufacturers over product availability. Further, HCD does not have knowledge of aerators available to allow existing products to be retrofitted to the 1.2 GPM without affecting other factors of product performance, such as WaterSense minimum flow requirement of 0.8 GPM at 20 psi. HCD recommends careful consideration of these factors.
- **Showerhead maximum flow rate of 2.5 GPM.** The 2013 California Plumbing Code and 2013 CALGreen Code, effective January 1, 2014 set a maximum flow rate for showerheads of 2.0 GPM. HCD recommends modifying the Appliance Efficiency Regulations to align with this codified flow rate.

HCD would like to thank the Energy Commission for the opportunity to comment on the proposed changes to the Appliance Efficiency Regulations, California Code of Regulations, Title 20. If you have any questions on SHL's comments, please feel free to contact the SHL Program, Kyle Krause at (916) 263-4719 or Emily Withers at (916) 263-2998.

Sincerely,

Shawn Huff
Assistant Deputy Director