

DOCKETED

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Appliance Efficiency Rulemaking for Residential Lavatory Faucets and Showerheads

Additional submitted attachment is included below.



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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:

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

Ferguson urges the California Energy Commission to revise the emergency regulation adopted on April 8 as follows:

- For all residential lavatory faucets manufactured on or after September 1, 2015, the maximum flow rate shall be 1.5 gpm.
- For all residential lavatory faucets and showerheads manufactured on or after July 1, 2016:
 - The maximum flow rate of residential lavatory faucets shall be 1.2 gpm.
 - The maximum flow rate of showerheads shall be 2.0 gpm.
- The authorization to sell-through all noncompliant plumbing products regulated by Title 20.

It is important to Ferguson that the July 1, 2016 manufacture deadline date for residential lavatory faucets and showerheads be placed into the regulation. This is a workable solution that is important to Ferguson as the date provides the needed timeframe for the manufacturers to work through product design, certification, and marking. In addition, this revised deadline allows the market sellers to address the challenges involved with the residential lavatory faucets and showerhead flow rate maximums that are affected by this important regulation. This approach is critical to avoid impacting consumers via market interruptions caused by product availability delays.

If you have any questions, or would like any additional information, please feel free to contact me at 757-223-6070

Sincerely,

A handwritten signature in cursive script that reads 'W. Scott Russell'.

Scott Russell
Senior Vice President, Sourcing