

## DOCKETED

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## **MOEN Comments on Emergency Rulemaking**

*Additional submitted attachment is included below.*



July 31, 2015

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 15-AAER-05  
1516 Ninth Street  
Sacramento, CA 95814-5512  
Via email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

RE: 2015 Appliance Efficiency Rulemaking  
Residential Lavatory Faucets and Showerheads

Dear Commissioners,

Moen Incorporated appreciates the opportunity to provide comments regarding this Rulemaking and respectfully submits the following:

**Comment:** Permit the servicing of installed lavatory and kitchen faucets with the original equipment aerators by removing lavatory replacement aerators and kitchen replacement aerators as CEC regulated products.

**Rationale:** Installed lavatory and kitchen faucets must be permitted to be serviced with the original equipment aerators because otherwise it will result in non-functioning faucets in some cases or worse, catastrophic leaks in others that damages property and creates a health hazard. At any given flow rate through a faucet, there is an associated pressure which creates static and dynamic forces acting upon the various components. It follows then that some internal mechanisms have to be designed for specific flow rates in order to function properly. For instance, a kitchen faucet side spray diverter relies on a certain pressure differential in order to activate properly. Similarly, a reduced flow rate will have a corresponding increased pressure which may cause some components to unknowingly deform and leak or fail altogether. Furthermore, not permitting this would transform simple inexpensive faucet maintenance into an expensive faucet replacement thus generating consumer backlash, especially for low income households.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "John E. Bertrand", is written over a light blue horizontal line.

John Bertrand  
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