

DOCKETED

Docket Number:	15-AAER-05
Project Title:	Residential Lavatory Faucets and Showerheads
TN #:	205580
Document Title:	Clint Davis Comments: Senior Vice President/Generl Merchandising Manager
Description:	N/A
Filer:	System
Organization:	Clint Davis
Submitter Role:	Public
Submission Date:	7/31/2015 10:10:25 AM
Docketed Date:	7/31/2015

Comment Received From: Clint Davis

Submitted On: 7/31/2015

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Additional submitted attachment is included below.



July 29, 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:

On behalf of the more than 18,000 Lowe's associates at our 111 Lowe's and 71 Orchard Supply & Hardware store locations across California, we appreciate this opportunity to provide our comments in this proceeding, Docket #15-AAER-05 Appliance Efficiency Rulemaking for Residential Lavatory Faucets and Showerheads.

We are proud to offer a number of EPA qualified WaterSense® conservation products including faucets, showerheads and toilets to our customers in our stores and online at lowes.com. We understand the extreme drought conditions facing California and want to contribute to the conservation effort.

However, we urge the California Energy Commission to revise the emergency regulation adopted on April 8, 2015, 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 Lowe's 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 Lowe's and our customers 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 704-758-4083. Thank you for your time and consideration of this request.

Sincerely,

Clinton T. Davis
Senior Vice President, General Merchandise Manager