

## DOCKETED

<b>Docket Number:</b>	15-AAER-05
<b>Project Title:</b>	Residential Lavatory Faucets and Showerheads
<b>TN #:</b>	205590
<b>Document Title:</b>	CSA Group Comments
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Todd Lumpkin
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	7/31/2015 12:02:28 PM
<b>Docketed Date:</b>	7/31/2015

*Comment Received From: Todd Lumpkin*

*Submitted On: 7/31/2015*

*Docket Number: 15-AAER-05*

## **CSA Group Comments**

*Additional submitted attachment is included below.*



California Energy Commission  
Docket No. 15-AAER-05  
1516 9th Street, MS-4  
Sacramento, CA 95814

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

Dear Commissioners:

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

CSA Group 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 216 524 4990 ext. 88149

Sincerely,

Todd Lumpkin  
Global Business Unit Director, Appliances and Gas, Energy, and Plumbing  
CSA Group  
Mobile : 216-536-1573  
E-mail: [todd.lumpkin@csagroup.org](mailto:todd.lumpkin@csagroup.org)