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| Project Title: | Residential Lavatory Faucets and Showerheads |
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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