

DOCKETED

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Project Title:	Residential Lavatory Faucets and Showerheads
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Document Title:	Dann Holmes Comments: Third-Party Certification Process
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Comment Received From: Dann Holmes

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Docket No. 15-AAER-05 / Third-Party Certification Process

Additional submitted attachment is included below.

Docket Unit
California Energy Commission
Docket No. 15-AAER-01
1516 9th Street, MS-4
Sacramento, CA 95814

July 31, 2015

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

Dear Commissioners:

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

NSF International is an independent third-party certification organization whose mission is public health and safety. We are working with the manufacturers of plumbing products that are subject to the emergency regulations adopted on April 8, 2015 by the California Energy Commission to certify their products.

We recommend the Commissioners revise their 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 this new standard.

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 overall mission of public health and safety as well as our role in providing product certification.

The normal certification process can last 90 days. Given the magnitude of the California drought, and the additional resources NSF would commit to, we could anticipate 60 or 70 days under ideal conditions. Likewise, if the regulatory process increases the demand for additional models be available through the supply chain, this could delay the overall certification process out to 120 days, or longer.

If you have any questions, or would like any additional information, please feel free to contact me at (734) 913-5737 or mclellan@nsf.org.

Sincerely,



Clifton J. McLellan
NSF International | Vice President Global Water