

DOCKETED

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

Additional submitted attachment is included below.



INTERNATIONAL ASSOCIATION OF PLUMBING AND MECHANICAL OFFICIALS

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

Submitted via email to: DOCKET@energy.ca.gov

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

Dear Commissioners:

The International Association of Plumbing and Mechanical Officials (IAPMO) appreciates this opportunity to provide our comments in this proceeding, Docket #15-AAER-05 Appliance Efficiency Rulemaking for Residential Lavatory Faucets and Showerheads.

As an independent third-party certification body (CB), IAPMO works closely with our manufacturer clients to provide independent testing and certification services that allow manufacturers to demonstrate continuous compliance with all applicable construction codes, product standards and regulations. The emergency regulations adopted by the California Energy Commission on April 8th will necessitate that all impacted faucet and showerhead models offered for sale in the State of California be retested and recertified.

Much has been said about the complexities, or lack thereof, involved with the new regulations from both the manufacturer and CB perspective. We have heard comments that the new regulations would allow a manufacturer to simply unscrew one aerator and replace it with another in order to achieve compliance. Such comments are a disservice to our industry, and ignore the complexities these new and existing regulations create as they apply to the affected products.

While IAPMO does not in any manner purport to speak for the manufacturers, our experience in the industry allows us to understand how the new regulations will necessitate numerous undertakings, including the generation and support of new product SKU's, new markings on both the product and packaging, countless engineering change notifications, separate forecasting and inventorying for new SKUs, literature revisions, as well as many other mundane but nonetheless costly and time



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consuming activities, many of which are required before the process of retesting and recertification can begin.

From the CB perspective, each certifier will be impacted differently based on the size of their client base and the number of models that will be submitted for retesting and / or recertification. For IAPMO, due to our industry leadership status, the new regulations will result in a very significant backlog for both our laboratory testing and our third party certification services. We expect that thousands of models will require retesting at IAPMO R&T Labs and / or recertification at IAPMO R&T. At this time, it's difficult to accurately predict when this spike in demand will occur, how many models will be submitted, or how long it will take to work through the resulting backlog. However, it's clear that an enforcement date of 1/1/2016 does not take the above complexities into account, and has a high potential to result in confusion should the regulations become effective and certified products are not yet sufficiently available in the marketplace to meet demand.

As a result, we urge the Commission to revise the emergency regulation adopted on April 8th to provide a July 1, 2016 effective date for residential lavatory faucets and showerheads to be manufactured and independently third-party certified to be in compliance with the new standards.

If you have any questions or would like any additional information, please contact me at (732) 329-1237.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter DeMarco", is written over a white background.

Peter DeMarco
Senior Vice President of Advocacy and Research
The IAPMO Group