

## DOCKETED

<b>Docket Number:</b>	15-AAER-05
<b>Project Title:</b>	Residential Lavatory Faucets and Showerheads
<b>TN #:</b>	205605
<b>Document Title:</b>	CRA Comments
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	California Retailers Association
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	7/31/2015 2:14:10 PM
<b>Docketed Date:</b>	7/31/2015

*Comment Received From: Pamela Williams*

*Submitted On: 7/31/2015*

*Docket Number: 15-AAER-05*

**CRA Comments in Response to Docket No. 15-AAER-05 CRA Comments**

*Additional submitted attachment is included below.*



July 31, 2015

Docket Unit  
California Energy Commission  
Docket No. 15-AAER-05  
1516 9th Street, MS-4  
Sacramento, CA 95814-5504

Sent via email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

**RE: CEC Docket No. 15-AAER-05, Proposed Amendments to Appliance Efficiency Regulations California Code of Regulations, Title 20, Section 1601-1608**

Dear Commissioners:

On behalf of the California Retailers Association (CRA), we are submitting the following comments in response to the proposed amendments to the Appliance Efficiency Regulations for residential lavatory faucets and showerheads and staff analysis. CRA represents all facets of retail, including home improvement retailers such as The Home Depot and Lowes, who play a significant role in providing water-efficient appliances, fixtures and materials for consumers. Our comments generally align with those provided by Plumbing Manufacturers International (PMI).

Our retail members understand the devastating impact of the drought and are committed to continue to do all we can to help customers achieve maximum water conservation. As discussed during the July 29, 2015 workshop, a very limited supply of 1.2 gallons per minute (GPM) residential lavatory faucets are currently available on the market. We previously requested revising the emergency regulations to allow manufacturers to fabricate products, and retailers to get them on the shelves and online by extending the implementation of 1.2 GPM to January 1, 2017.

Per staff analysis, we can endeavor to work with our industry partners to have 1.2 GPM faucets available by July 1, 2016 while allowing for sell-through. The flexibility of sell-through is critical to maintain a steady flow of commerce given supply chain complexities. We support the staff recommendation to extend the effective date for 1.2 GPM flow rates to July 1, 2016. We believe the staff recommendation for faucets to meet a maximum flow rate of 1.5 GPM with an implementation date of September 1, 2015 and manufactured before July 1, 2016 is workable solution. These efforts would help achieve the greatest water conservation immediately.

July 31, 2015

Lastly, we are also supportive of implementing 2.0 GPM showerheads manufactured on or after July 1, 2016 to be consistent with the delayed implementation date for residential lavatory faucets, and to allow for sell-through. Again, the ability to sell-through is a significant factor for retailers because it allows ease of operations, and takes into consideration the complex movement of goods.

We appreciate your time and consideration of retailers' input through the rulemaking process, and the opportunity to provide comments to the proposed amendments to the Appliance Efficiency Regulations for residential lavatory faucets and showerheads. Should you have any questions, please call or email me at (916) 443-1975 or [pwilliams@calretailers.com](mailto:pwilliams@calretailers.com).

Sincerely,

A handwritten signature in dark ink, appearing to read "P. B. Williams". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Pamela Williams  
Senior Vice President  
California Retailers Association

cc: Senator Pavley  
Wade Crowfoot, Office of Governor Brown  
Kip Lipper, Office of Senate President Pro Tem de Leon  
Francisco Uribe, The Home Depot  
Janice Disney, The Home Depot  
Jerry Desmond, Plumbing Manufacturers International