

DOCKETED

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July 30, 2015

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

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

Dear Commissioners:

NEOPERL appreciates the opportunity to provide comments in this proceeding.

NEOPERL, Inc. is based in Waterbury, CT and employs at this site 60 people in the design, manufacturing and distribution of plumbing components and in particular of faucet aerators. NEOPERL is part of a group of companies with manufacturing facilities around the world to serve the local industry and distribution. NEOPERL has a solid footprint in Germany, Italy, Spain and the UK for Europe and in China and India for Asia.

NEOPERL products are used by the manufacturers of plumbing products that are subject to the emergency regulations adopted by the California Energy Commission on April 8 and are also available through the Professional Plumbing Trade (Wholesalers and MRO Specialists) and the DIY Retail Trade.

NEOPERL has been actively involved in most of the discussions that followed the announcement of Governor Brown's emergency Response Plan (B-29-15) and the publication of the amendments to the Appliance Efficiency Regulations (CCR title 20, sec. 1601-1608) and attended remotely the hearings of July 28 (Workshop).

In addition to being an active member of PMI (Plumbing Manufacturer International), NEOPERL is also a Watersense partner (manufacturer category), a member of the American Society of Plumbing Engineer (ASPE), of the US Green Building Council (USGBC) and of the Alliance for Water Efficiency (AWE).

NEOPERL recognizes that there is a consensus on the feasibility of a transition to 1.8 gpm for kitchen faucets given the earlier introduction of this flow rate into California's market by the 2010 Building Code (CALGreen 2010) however there are still disagreements on the opportunity of a rapid implementation of lower flow rates for lavatory faucets (1.2 gpm).

NEOPERL would like to take the opportunity of this call for comments to clarify a few points:

1- Given the drought conditions in California NEOPERL applauds the decision to move towards making some of the voluntary water conservation initiatives launched by EPA Watersense to become *mandatory* in the state of California.

2- NEOPERL is the global market leader but not the sole supplier of faucet aerators. There are other established producers in Europe and in China. Using NEOPERL aerators is a choice for Faucet Manufacturers which we hope is based on NEOPERL's product quality, depth of product lines, competitiveness as well as local and global service.

3- As stated in the CEC staff analysis of 7/24/2015 NEOPERL is indeed already offering a range of 1.0 gpm pressure compensating faucet aerators that meet the performance standards of Watersense.

4- Since the April 2015 announcement by CEC, NEOPERL has been pulling resources at its various manufacturing locations to make the new 1.2 gpm product lines available quickly for our Industry customers and distributors. This effort required, among other things, to develop many new large capacity plastic molding tools. Lead times for large tools are not compressible at will.

5- NEOPERL, as a component supplier, will commit to support the launch of the 1.2 gpm faucet lines by the Industry. The suggested timeline shared by the Industry with NEOPERL is currently:

- September 1, 2015: 1.5 gpm max for residential lav faucets
- July 1, 2016: 1.2 gpm max for residential lav faucets
2.0 gpm for showerheads
- Provision authorizing retailers and distributors to sell through non-compliant plumbing products

6- NEOPERL recommends to make compliance with Watersense specifications a requirement for all plumbing products sold into California for which a Watersense specification applies, including 1.2 gpm faucets and 2.0 gpm showerheads.

7- NEOPERL, as a supplier of replacement aerators to the Professional Trade and the DIY Retail Trade is working diligently to ensure that replacement 1.2 gpm Watersense aerators are available to fill the shelves of retailers as early as possible and no later than July 1, 2016.

8- Given the limited market penetration in California of Watersense products seven years after their launch NEOPERL welcomes the implementation of consumer incentives for faucet, shower and aerator products as long as covered products are required to meet Watersense specifications and consumers allowed to choose their products individually.

If you have any questions, or would like additional information, please feel free to contact NEOPERL at info@neoperl.com.

Sincerely,



Fred Fraise
NEOPERL, Inc.
Managing Director



Marie-Helene Pernin
NEOPERL, Inc.
Vice President, Sales & Marketing