

DOCKETED

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Filtered Showerhead Exemption from Minimum Flow Requirements

Additional submitted attachment is included below.



ESTABLISHED in 1974

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August 10, 2015

RE: Docket#: 15-AAER-05-Residential Lavatory Faucets and Showerheads
(Minimum Flow Rates for Filtered Shower Heads)

To: The California Energy Commission

The California consumer can improve the quality of their shower water by installing an external shower filter between the shower arm and showerhead to remove chlorine, sediment, odors and other contaminants. However, the installation of a shower filter can reduce the height of the showerhead which if already low, can be a problem. To solve this, Sprite designed and patented a showerhead with an integrated filter system to minimize the extension of the showerhead.

Sprite supports the efforts of the CEC to conserve water and energy by reducing the maximum flow rate of showerheads from 2.5gpm to 2.0gpm. In fact, it currently offers filtered showerheads that are WaterSense certified. The issue is not with the reduced maximum flow rate of 2.0gpm but with the secondary minimum flow rate requirements that do not take into account the additional pressure needed to force water through the filterbed along with the resulting decrease in flow rate that occurs within the filter chamber.

Regular (non-filtered) showerheads and filtered showerheads have very different physical pressure requirements and flow rate performance characteristics. The filtered showerhead will be put at a competitive disadvantage to the non-filtered showerhead when tested to the same minimum flow requirements which will not only impede the ability of the current filtered shower heads to be listed under the Standards but also will impede future shower filtration engineering and designs which would be forced to sacrifice filtration performance due to the secondary minimum flow requirements.

Therefore, Sprite requests that the Water Efficiency Standards for Showerheads exempt Filtered Showerheads from the secondary minimum flow requirements.

Sprite appreciates the Committees' consideration.

Thank you,

David K. Farley
President/CEO
Sprite Industries, Inc.