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IOU CASE Team Comments on Adopted Title 20 Residential Lavatory Faucets and Showerhead Standards

Additional submitted attachment is included below.

Residential Lavatory Faucets and Showerheads

Codes and Standards Enhancement (CASE) Initiative
For PY 2015: Title 20 Standards Development

Comments on Express Terms

CEC Docket Number 15-AAER-05

August 12, 2015

Prepared for:



PACIFIC GAS &
ELECTRIC COMPANY



SOUTHERN
CALIFORNIA EDISON



SAN DIEGO GAS AND
ELECTRIC



A Sempra Energy utility
SOUTHERN CALIFORNIA GAS
COMPANY

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This document comprises the comments of the Pacific Gas and Electric Company (PG&E), Southern California Gas Company (SCGC), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE) Codes and Standards Enhancement (CASE) Initiative Project in response to the California Energy Commission's (CEC) proposed amendments to Appliance Efficiency Regulations (Title 20) for residential lavatory faucets and showerheads. The California Investor Owned Utilities (IOUs) involved in the CASE Initiative Project represent some of the largest utility companies in the Western United States, serving over 35 million customers.

We support CEC's proposed efficiency standards for lavatory faucets and showerheads. We commend CEC for responding to the current drought emergency and Governor Brown's April 1, 2015 executive order that directed CEC to "adopt emergency regulations establishing standards that improve the efficiency of water appliances"¹ in a meaningful way. The proposed standards will result in significant water, energy, and cost savings and will keep California on the right path to meeting its water efficiency goal of reducing per capita urban water use by 20 percent by 2020 and its long-term energy efficiency goals. The proposed standards will result in both water and embedded energy savings since nearly twenty percent of the energy used in California is attributed to water supply, conveyance, treatment, and distribution.²

While we support CEC's proposed amendments to Title 20, the IOUs stand by our joint recommendation that CEC consider a shower mixing valve labeling requirement and additional showerhead performance requirements in future updates to the Title 20 showerhead standards.³ Implementing labeling requirements for shower mixing valves will help improve the compatibility of shower systems and therefore minimize the risk of thermal shock. Performance requirements, including adequate spray force and spray coverage and minimum flow rate requirements for a range of water pressures, ensure that consumers will remain satisfied with high efficiency showerheads. If showerheads do not meet consumers' expectations, people may be inclined to take longer showers, thus negating some of the water savings from the higher efficiency showerheads.

Throughout the rulemaking process, the IOUs have advocated for cost-effective code change proposals by providing CEC with credible data and technical documentation. The standards being considered for adoption on August 12, 2015 represent a balance of many interests. We thank the Commission for the opportunity to be involved and for considering our input to these standards. The IOUs are proud to support efforts to continually improve California's Appliance Efficiency Regulations, and we encourage CEC to build on the momentum of the standards adopted on August 12 by adopting additional water efficiency standards moving forward.

¹ California Executive Order Number B-29-15. April 1, 2015. http://gov.ca.gov/docs/4.1.15_Executive_Order.pdf.

² California Energy Commission. <http://www.energy.ca.gov/2006publications/CEC-500-2006-118/CEC-500-2006-118.pdf>.

³ Showerheads CASE Report docketed on July 31, 2015. http://docketpublic.energy.ca.gov/PublicDocuments/15-AAER-05/TN205606_20150731T141501_Sarah_Schneider_Energy_Solutions_on_behalf_of_California_IOUs_C.pdf