

DOCKETED

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PMI Comment - CA IOU Test Plan

Please refer to the attached letter.

Additional submitted attachment is included below.



November 3, 2017

Jessica Lopez
California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: DOCKET NO. 17-AAER-09 TUB SPOUT DIVERTERS – CALIFORNIA INVESTOR OWNED UTILITIES' TUB SPOUT DIVERTER TEST PLAN

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Lavelle Industries, Inc.

Dear Ms. Lopez:

Plumbing Manufacturers International (PMI) appreciates this opportunity to provide additional comments to the California Energy Commission (CEC) as the association and its members continue to participate in the current pre-regulatory proceeding, Docket No. 17-AAER-09 Tub Spout DiverTERS. PMI is the international, U.S.-based trade association representing 90% of U. S. plumbing products sold in the United States. We have made the promotion of water safety and efficiency a top priority and have included this in our mission statement¹.

Regarding the California Investor Owned Utilities' Tub Spout Diverter Test Plan submitted on September 18th for Docket No. 17-AAER-09, PMI would like to share the following concerns:

- ASME A112.18.3 is not an applicable testing protocol for tub spout diverters. The ASME A112.18.3 standard was developed for the protection against back pressure backflow and back siphonage backflow and does not accurately simulate the functionality of a tub spout diverter. For example, it would be difficult to accelerate results to accurately represent realistic water quality issues such as calcium deposits. A test to precipitate minerals out of water to simulate what is occurring in a customer's plumbing system would be extremely complex and dependent on pH, temperature, chemicals, the plumbing system the product is attached to, along with a host of assumptions which are not developed. The ASME A112.18.3 simply does not correlate.
- Additionally, the ASME A112.18.3 standard is applicable to fittings with outlets not solely protected by an air gap. Tub spouts are intended to have backflow protection via an air gap and therefore, the test methods within this standard are again not applicable.
- The testing protocol is only focused on lab results. Because the test plan does not gather and measure field data to compare with laboratory results, one cannot conclude that the lab results are representative of reality.

¹PMI's Mission: To promote the water efficiency, health, safety, quality and environmental sustainability of plumbing products while maximizing consumer choice and value in a fair and open marketplace. To provide a forum for the exchange of information and industry education. To represent openly the members' interests and advocate for sound environmental and public health policies in the regulatory/legislative processes. To enhance the plumbing industry's growth and expansion.

- Most manufacturers do not have the testing capabilities to fulfill the testing protocol of ASME A112.18.3. Therefore, significant costs will be incurred by manufacturers to send product to outside testing labs. The costs may be passed on to the California consumer.
- Inaccurate terminology is still being referenced for diverters (i.e. lift-type, pull-type, turn-type and push-type) and was addressed in PMI's comment letter dated September 15, 2017.
- Under "Objectives and Methodology," Item #1 that deals with reporting leakage mass for 1 minute starting at diverter closure may not produce accurate results amongst tub spout diverters. This requirement is really capturing residual water loss versus actual leakage. Leakage should be measured while the diverter is engaged and water is actively flowing out of the showerhead.
- Under "Objectives and Methodology," Item #3 is not a representation of product that can be sold in California. As of January 1, 2016, 2.0 gpm is the maximum flow rate for showerheads sold in CA. On July 1, 2018, 1.8 gpm will be the new maximum flow rate requirement.

PMI also reiterates our comment in the October 24th webinar that the information that is becoming known during this pre-rulemaking process raises a serious question as to whether lowering the maximum leakage rate for tub spout diverters will result in significant water and energy savings.

PMI welcomes questions from the Commission about our concerns and comments regarding Docket No. 17-AAER-09. We look forward to working with the CEC during the rulemaking process to promote water efficiency that will produce safe, sanitary, efficient and reliable products.

Sincerely,



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cc: PMI Board of Directors