

May 15, 2014

California Energy Commission  
Dockets Office, MS-4  
RE: Docket No. 14-AAER-1  
1516 Ninth Street  
Sacramento, CA 95814-1462

California Energy Commission

**DOCKETED**

**12-AAER-1**

**TN 73019**

**MAY 15 2014**

Greetings,

I would like to take a moment to provide our opinion on two issues heading before the CEC under the subject docket number:

1. Mandating a water closet score of 600g MaP is misguided. American Standard Brands easily has the most 600g+ water closets in the industry, and we still feel that such a mandate will do more harm than good. The MaP test is a marginal metric gauging water closet carry-out, and it does not address many other water closet performance metrics such as bowl cleanliness and water exchange. These metrics are competing with MaP performance, and when you drive consumers to purchase 600g+ water closets, you will, by extension, mandate water closets with decreased rim cleanliness and water exchange. This will necessitate double flushing. A 350g score is the better mandate because it promotes a more balanced water closet.
2. We suggest standardizing urinal flush volumes of 0.5gpf. We say this in the name of consistency across the industry. We have pint urinals that flush well, and we encourage our customers to purchase them rather than 0.5gpf urinals, but, we are hesitant to recommend 0.125 gpf as the industry standard.

Thank you for allowing us the opportunity to voice our opinion.

Kind Regards,



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