



Tuan Ngo

Appliance and Existing Buildings

California Energy Commission

Sacramento, California 95814

California Energy Commission

DOCKETED

14-AAER-1

TN 73134

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Subject: Pre-Rulemaking Docket Number #12-AAER-2C, "Faucets, Toilets, Urinals, and Water Meters"

Dear Tuan:

On behalf of Sierra Club and its more than 380,000 members and supporters in California, I submit the following comments on the Title 20 proposed water-use efficiency standards.

Sierra Club supports the California Energy Commission (CEC) in its efforts to develop appliance efficiency standards. California is experiencing one of the most severe droughts in recorded history. State agencies are working hard to provide some water supply security even if it's just through the end of the year. We appreciate the CEC doing its part. The proposed water-use efficiency appliance standards will not only save billions of gallons of water annually, they will help California meet its greenhouse gas emission reduction goals, reduce per-capita energy consumption in the state and save the people of California billions of dollars in the years to come.

Faucets and urinals

Sierra Club California is in support of the CEC adopting the proposed standards for the following water appliances:

1. **Urinals:** All urinals, except trough-type and those designed for prisons and mental health facilities, shall not consume more than 0.125 gpf. Products at this performance level are already widely available and affordable. They meet consumer expectations and will result in greater water and energy savings for California.
2. **Lavatory faucets:** All home lavatory faucets shall not exceed 1.0 gpm flow rate with pipe pressure at 60 psi and with a minimum of 0.5 gpm at 20 psi. Products at this performance level are already widely available and affordable. They meet consumer expectations and will result in greater water and energy savings for California.
3. **Kitchen faucets:** All kitchen faucets shall not exceed 1.8 gpm default flow rate with the ability to increase to 2.2 gpm temporarily for filling pots and pans. For health and safety reasons, we support the CECs proposed regulations.

Toilets

Sierra Club California is in support of the CEC adopting the proposed standards for toilets:

1. **Maximum Flush Volume:** All toilets, except those designed for prisons and mental health facilities, shall not consume more than 1.28 gpf. Dual flush toilets shall not exceed 1.28 gpf for the full-volume flush.
2. **Maximum Performance (MaP) Score:** all toilets shall have a Map Score no fewer than 600 grams. All toilet package labels shall include information on toilet's waste removal performance (MaP scores). We would like to see the Map score requirement increase from 350 to 600 grams because toilets with MaP scores that meet or exceed 600 grams are already widely available.

A higher performance standard will ensure that the product functions properly. MaP scores do not sufficiently account for the impact of toilet paper as most performance testing is done with single ply paper and it not representative of what is use in the majority of households. If the tests took toilet paper variation into consideration, toilets that only barely passed the 350 MaP standards may not pass after the reevaluation.

Though there are many factors that contribute to double-flushing, higher performance standards will result in water savings because effective waste removal contributes to reducing double-flushing. Higher performance levels will cut the performance testing in half as the product will only need to be tested at 600, 800, and 1000. The smaller range of testing saves money and time.

Higher performance standards also help to maintain consumer satisfaction and positive perception for toilets. Consumer backlash will harm the CECs efforts to conserve water and energy and hinder California's progress towards greenhouse gas emission reduction goals. The CEC must adopt these MaP standards to ensure this doesn't happen.

Since the appliance efficiency program's inception, the state has enjoyed substantial energy and monetary savings and a significant reduction in greenhouse gas emissions. With a drought state of emergency declared, CEC will also be able to contribute to the state's goal of reducing water demand and alleviating pressures on California's already imperiled watersheds by implementing these water-use efficiency standards.

Sincerely,



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