

June 6, 2014

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 14-AAER--1
1516 Ninth Street
Sacramento, CA 95814-5512
Via email: docket@energy.ca.gov

Dear Commissioners,

Moen Incorporated appreciates the opportunity to provide comments regarding the Staff Analysis of Toilets, Urinals, and Faucets.

Moen agrees with and fully supports the Staff's proposed standards for toilets, urinals, and faucets which align with the requirements in the California Plumbing Code and CalGreen. We offer the following comments regarding the proposed changes to Title 20:

Section 1601. Scope.

- Valves for water closets and urinals are plumbing fittings.
- Note that valves are marketed for use in both new construction or repair and are not marked specifically as "replacement" valves.

Section 1602. Definitions.

- Suggest deleting the individual definitions and instead incorporate by reference the definitions in the national consensus standards ASME A112.18.1/CSA B125.1 and ASME A112.19.2/CSA B45.1, which are referenced in the aforementioned California codes.
- Automatically keeps Title 20 definitions synchronized with nationally recognized definitions and eliminates any ambiguity and confusion that might arise from conflicting definitions.

Section 1604. Test Methods for Specific Appliances.

- The units of measure (gpm and gpf) for the maximum permissible water use for fittings and fixtures are defined in:
 - 10 CFR 430.23(s) for faucets
 - 10 CFR 430.23(t) for showerheads
 - 10 CFR 430.23(u) for water closets
 - 10 CFR 430.23(v) for urinals
- These sections reference the test methods in Appendix S (faucets and showerheads) and Appendix T (water closets and urinals) for measuring the maximum permissible water use.

- Delete the reference to “MaP” in all sections as the test method is already duplicated in the standard ASME A112.19.2/CSA B45.1, and is a required pass/fail test at the 350 gram minimum value.

Section 1605.1. Federal and State Standards for Federally Regulated Appliances.

- ASME A112.18.1M should be updated to the latest revision ASME A112.18.1/CSA B125.1-2012. 10 CFR has also been updated to this revision.

Proposals by California Investor Owned Utilities (IOU’s)

- 0.125 gpf urinals – Moen agrees with and fully supports the Staff recommendation not to accept this proposal for a drastic reduction in flush volume. This flush volume has not been shown to be safe and effective in all installations, especially since flush valves are marketed for both new construction and repair.
- 600 gram MaP score for toilets – Moen agrees with and fully supports the Staff recommendation not to accept this proposal. The 350 gram level has worked well since its introduction in 2006 as evidenced by the EPA not revising the WaterSense specification.
- 1.0 gpm lavatory faucets – Moen agrees with and fully supports the Staff recommendation not to accept this proposal. This keeps Title 20 aligned with the California Plumbing Code, CalGreen, WaterSense, and many other state and local codes which require the 1.5 gpm flow rate. Manufacturers have aligned with the 1.5 gpm flow rate, and as a result, consumers have a plethora of choices available. Furthermore, water conservation is partially dependent on consumer behavior. A 1.0 gpm faucet will not save water if a consumer needs to leave it on twice as long to accomplish a task.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "John E. Bertrand".

John Bertrand
Manager – Compliance
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