



## SOUTHWEST ENERGY EFFICIENCY PROJECT

*Saving Money and Protecting the Environment Through More Efficient Energy Use*

June 6, 2014

California Energy Commission  
Docket No. 14-AAER-1  
Docket Unit  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

California Energy Commission

**DOCKETED**

**14-AAER-1**

**TN 73137**

**JUN 06 2014**

Docket Number: 14-AAER-1

RE: Draft Staff Report: Faucets, Toilets & Urinals

Dear Commission:

The Southwest Energy Efficiency Project (SWEEP) is a public interest organization that advances more efficient energy use in six states including Arizona and Nevada. This letter comprises the comments of SWEEP in response to the California Energy Commission's staff analysis of toilets, urinals and faucets for Appliance Efficiency Regulations. These regulations are important for water savings not only in California, but also in the states that SWEEP works in.

We commend the Energy Commission for responding to the urgency of both California and national water scarcity by prioritizing updates to Title 20 standards for toilets, urinals, and faucets. States across the nation, especially in the western United States are facing increasingly threatening water resource constraints. Water efficiency is necessary to ensure that communities have reliable access to water and that our nation's food supply remains secure and affordable. Moreover, reducing water use also alleviates energy resource constraints. For example, pumping, conveying, treating, and distributing water in California accounts for 20 percent of the state's total electricity use.<sup>1</sup>

While we commend the Energy Commission for taking on this challenging issue, the standards the Commission has recommended in the Draft Staff Report do not establish a strong path forward for water efficiency. The Commission's proposed standards for toilets and urinals are already state law, as enacted by AB 715 (Laird 2007). The state will not achieve any additional water savings from CEC's proposed standards except for faucets, yet more stringent efficiency standards for all products in all categories (including faucets) are cost-effective and available in the market today. For example, 49 percent of the aerators in the Department of Energy's Appliance Efficiency Database are designed to use 1 gallon per minute (gpm) or less at 60 pounds per square inch. Setting the maximum flow rate at 1 gpm would increase the total water savings by 500 percent relative to the Commission's proposed efficiency level of 1.5 gpm.

We recommend that the Commission adopt the faucet, toilet, and urinal water efficiency standards proposed by the California IOUs - maximum flow rate of 1 gpm for faucets, 0.125 gallon per flush (gpf) standard for urinals and a 1.28 gpf maximum flush volume for dual flush toilets. If adopted, the

<sup>1</sup> <http://www.energy.ca.gov/research/iaw/water.html>



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proposed standards would result in over 25 billion gallons of water savings per year, beyond the savings achieved by the CEC's proposal.

The rest of the nation regularly looks to California to lead on efficiency standards; the standards the Energy Commission adopts during this rulemaking will set the stage for the nation's water efficiency activities in the coming years and decades. We urge the Commission to reflect on the severity of your state's water resource crisis, as well as the critical water challenges throughout the Western U.S., and establish the forward-thinking standards that are warranted. The Commission has a responsibility to embrace this opportunity to establish a path forward for California and for the nation.

Thank you for the opportunity to provide feedback regarding this important matter, and thank you for careful consideration of the comments provided this letter.

Sincerely,

Howard Geller  
Executive Director