



**IRVINE RANCH WATER DISTRICT**

15600 Sand Canyon Avenue • P.O. Box 57000 • Irvine, California 92619-7000 • (949) 453-5300 • [www.inwd.com](http://www.inwd.com)

California Energy Commission

**DOCKETED**

**14-AAER-1**

**TN 73161**

**JUN 06 2014**

June 6, 2014

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

Delivered via email to: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

**RE: CEC DOCKET NO. 14-AAER-1, APPLIANCE EFFICIENCY PRE-RULEMAKING**

Thank you for this opportunity to comment on the CEC's Water Appliance Efficiency program. The Irvine Ranch Water District (IRWD) provides high-quality drinking water and reliable wastewater collection and treatment services to more than 350,000 residents in Central Orange County. We are considered a leader in water use efficiency and demand management, and have successfully reduced our residential use from 170 gallons per capita per day to 86 gallons per capita per day in 2013. We have also reduced our reliance on imported water from 64% in 1990 to 22% in 2013. We have partnered with energy utilities on unique and innovative partnership programs that achieve both water and energy savings, including plumbing retrofit programs.

We are very aware of and support implementing programs and standards that will make California more water efficient, particularly in light of the current drought. However, any program or standard must be thoroughly evaluated and analyzed, and in this proceeding we believe that the CEC should adopt plumbing standards that are supported by: (1) adequate field research and investigation; (2) examination of the full effects on the entire plumbing system; (3) documentation of true impacts and costs of the proposals; (4) consideration of potential public health issues; and (5) recognition of available resources and expertise.

We have reviewed both the CEC draft staff report and the CASE team recommendations from the California Investor Owned Utilities (IOU's) related to the subject docket. **IRWD supports the CEC staff recommendation for the proposed faucet, toilet and urinal rulemaking.**

IRWD recommends that the maximum water consumption thresholds specified in AB715, SB 407 and CalGreen be incorporated into the CEC Title 20 requirements. These levels have been developed, comprehensively analyzed, scrutinized, and vetted by standards organizations, water utilities, regulators, efficiency advocates, and the plumbing industry during the last several years. In addition, after much study and deliberation among all stakeholders, they have been incorporated into the two key national standards (both ANSI approved standards) and the three WaterSense specifications:

- ASME A112.18.1-2012/CSA B125.1-12: Plumbing Supply Fittings (Faucets)
- ASME A112.19.2-2013/CSA B45.1-13: Ceramic Plumbing Fixtures (Toilets and Urinals)
- WaterSense Specification for Tank-Type Toilets, version 1.1, May 20, 2011
- WaterSense Specification for Flushing Urinals, version 1.0, August 14, 2009
- WaterSense High-Efficiency Lavatory Faucet Specification, version 1.0, October 1, 2007

Those maximum consumption thresholds are as follows:

- Water Closets: 1.28 gpf
- Urinals: 0.5 gpf
- Lavatory Faucets (residential): 1.5 gpm (minimum of 0.8 gpm)

**IRWD also supports the CEC Staff recommendations for the following products:**

- Kitchen faucets: 1.8 gpm maximum @ 60 psi with an allowable 2.2 gpm maximum override for pot filling, consistent with CalGreen
- Commercial lavatory faucets: 0.5 gpm maximum @ 60 psi, consistent with CalGreen and the model plumbing codes

Detailed comments supporting these recommendations were submitted to the CEC by the Alliance for Water Efficiency (AWE) on this proceeding. IRWD fully concurs with those comments.

Sincerely,



Fiona M. Sanchez  
Director of Water Resources