



MARIN MUNICIPAL WATER DISTRICT

220 Nellen Avenue Corte Madera CA 94925-1169
www.marinwater.org

June 6, 2014

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

California Energy Commission

DOCKETED

14-AAER-1

TN 73193

JUN 11 2014

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

The Marin Municipal Water District is a public utility providing water to 186,000 people in a 147-square-mile area of south and central Marin County. In operation since 1912, MMWD is the oldest municipal water district in California. The District has actively promoted water conservation since the mid-1970s and is a charter signatory to the 1991 Memorandum of Understanding regarding Urban Water Conservation in California (MOU).

Thank you for this opportunity to comment on the CEC's Water Appliance Efficiency program. **As a member of the Alliance for Water Efficiency (AWE), we agree with AWE and we support the CEC staff recommendation for the proposed faucet, toilet and urinal rulemaking.**

MMWD supports AWE's position 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.

Finally, MMWD agrees with and fully supports AWE's comments and recommendations on this matter and we support the CEC staff report, and recommend that the maximum water consumption thresholds specified in AB715, SB 407 and CalGreen be incorporated into the CEC Title 20 requirements. As AWE noted, 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 stakeholders¹, 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

¹ Stakeholders include plumbing manufacturers, water efficiency advocates and consultants, testing laboratories, certification bodies, government representatives, and the public.

- 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)

MMWD 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

Sincerely,



Krishna Kumar

General Manager

Marin Municipal Water District

Corte Madera, CA 94925-1196