



## INTERNATIONAL ASSOCIATION OF PLUMBING AND MECHANICAL OFFICIALS

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November 4, 2014

California Energy Commission  
Docket's Office, MS-4  
Re: Docket Number 14-AAER-1  
1516 Ninth Street  
Sacramento, CA 95814-5512  
Attention: Mr. Tuan Ngo, P.E.

California Energy Commission

**DOCKETED**

**14-AAER-01**

**TN 73971**

**NOV 14 2014**

Via email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

Dear Mr. Ngo,

IAPMO is again issuing comments to the California Energy Commission regarding Docket 14-AAER-1, Water Appliance Efficiency. Specifically, these comments are in response to the correspondence from the Investor Owned Utilities in which a recommendation to establish a maximum flow rate of 1.0 gpm for residential lavatory faucets is put forward for the consideration of the Commission.

IAPMO R&T is North America's premier plumbing and mechanical product certification agency. It is accredited by American National Standards Institute (ANSI), Standards Council of Canada (SCC) and Entidad Mexicana de Acreditación.

Our comments are as follows:

IAPMO R&T supports the efficiency levels for toilets, urinals, faucets, and replacement valves as shown below:

Toilets – 1.28 gpf max. and 350 gram extraction pass / fail requirement per ASME A112.19.2/CSA B45.1-2013.

Urinals – 0.5 gpf max.

Lavatory faucets – 1.5 gpm max. @ 60 psi

Kitchen faucets – 1.8 gpm max. @ 60 psi with an allowable 2.2 gpm max. override for pot filling

Commercial faucets – 0.5 gpm max. @ 60 psi

*The above requirements shall have an effective date of one year after adoption by the CEC.*

Replacement flushometer-valves for toilets – 1.6 gpf max.

Replacement flushometer-valves for urinals – 1.0 gpf max.

*The above requirements shall have an effective date of January 1, 2019.*

IAPMO R&T has reviewed the recent recommendations from the California Investor Owned Utilities (IOU's). We are extremely concerned with their recommendation to lower lavatory faucet flow rates to 1.0 gpm max, with a minimum flow rate of 0.5 gpm.



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Much has already been submitted to the CEC regarding the fallacy of the anticipated water efficiency savings from this recommended provision. IAPMO R&T agrees with the comments provided by the Plumbing Manufacturers International (PMI) regarding substantial hot water delivery times and energy wasted through heat losses associated with such a flow rate reduction. In addition, however, another unintended consequence of this provision pertains to faucets listed to the U.S. EPA's WaterSense® Program.

IAPMO R&T is by far the leading certifier of plumbing products to the U.S. EPA's WaterSense® Program. If the State of California were to adopt a 1.0 gpm maximum / 0.5 gpm minimum flow rate for residential lavatory faucets, models that are currently listed to the WaterSense® program will no longer qualify to bear the WaterSense® label unless they also have a minimum flow rate of 0.8 gpm, as required by the WaterSense® specification, across a pressure range of 20 to 80 psi. It should be pointed out that to achieve a 1.0 gpm maximum / 0.8 gpm minimum flow rate across such a wide pressure range is difficult to achieve. This would also cause confusion regarding the merits of the WaterSense® program both within the State of California and elsewhere.

IAPMO R&T strongly opposes the MOU flow rate reduction proposal for residential lavatory faucets. Please contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Peter DeMarco", is written over a light blue horizontal line.

Peter DeMarco - Senior Vice President of Advocacy and Research  
The IAPMO Group