Appliance Standards Awareness Project
Natural Resources Defense Council

December 4, 2015

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program
Mailstop EE-5B
1000 Independence Ave, SW
Washington, DC 20585-0121

Docket Number: EERE-2014-BT-STD-0027
RIN: 1904-AD31

Dear Ms. Edwards:

This letter comprises the comments of the signatories in response to the Department of Energy's republished Notice of Data Availability (NODA) dated November 20, 2015 regarding Commercial Pre-rinse Spray Valves (CPSVs).

We thank the DOE for its responses in the NODA to our comments submitted on the earlier NOPR under this docket on September 22, 2015.

1. Product Classes

In our earlier comments we concurred with CPSV manufacturers and recommended that DOE retain a single product class for CPSVs, rather than creating three product classes based on spray force. According to the NODA, DOE has decided to move ahead with three product classes. We believe that DOE has made this decision: (a) without providing evidence that new product classification will provide any benefits to the consumer; (b) without evidence the classifications will improve energy and water efficiency; and, (c) without adequately addressing concerns raised that the three product classes proposed are not recognized by customers in the current marketplace for CPSVs. The effect of creating three product classes might inadvertently drive customers who currently purchase CPSVs that exhibit a range of flow rates to the third product class with the highest flow rate or to use uncovered spray valves in lieu of PRSVs.

We appreciate that DOE has taken the step of renaming the three proposed product classes in an attempt to reduce the potential market effect described. DOE presents market data (from WaterSense) showing a correlation between spray force and customer satisfaction, but DOE does not show that the market for CPSVs is currently differentiated into different product classes according to spray force based on market share. Without the benefit of market research that shows the current distribution of CPSV flow-rates weighted by sales, or market research that explores what CPSV purchasers look for when buying a new unit, we continue to be concerned that creating three product classes could increase, rather decrease, the average flow rate of products sold into this market. We request DOE delay creating these classifications until evidence exists that the classifications provide benefits.

2. Efficiency Levels

Table I.1 shows the maximum flow rates in gallons per minute that DOE proposed in the NOPR published on July 9, 2015.

Table I.1—Proposed Energy Conservation Standards for Commercial Prerinse Spray Valves (Compliance Starting 2018)

Product class	Maximum water flow rate(gpm)
1. Light duty (≤5 ozf)	0.65
2. Standard duty (>5 ozf and ≤8 ozf)	0.97
3. Heavy duty (>8 ozf)	1.24

Our earlier recommendations supported the maximum flowrate of 1.24 gpm for all CPSV. In the NODA DOE presents updated Efficiency Levels based on new engineering analysis in Table II.3 as follows:

Table II.3 Efficiency Levels for CPSV Product Class 3 (Spray Force > 8 ozf)

Efficiency Level	Description	Flow Rate gpm
Baseline	Current Federal standard	1.60
Level 1	10% improvement over baseline	1.44
Level 2	WaterSense level; 20% improvement over baseline	1.28
Level 3	Maximum technologically-feasible (max-tech)	1.13

We continue to support our earlier recommendation for a single maximum flow rate of 1.24 gpm, based on the NOPR analysis, until DOE provides additional information beyond what was provided in this NODA. We encourage DOE to look carefully at the data relating to user experience with WaterSense compliant CPSVs currently on the market in making a final determination for standard Efficiency Levels.

We appreciate the opportunity to provide these comments and look forward to the final rule.

Sincerely,

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on behalf of
Appliance Standards Assistance Project (ASAP)

Edward R. Osann
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Natural Resources Defense Council