



ASAP

**APPLIANCE STANDARDS
AWARENESS PROJECT**

September 18, 2017

California Energy Commission
Docket Office, MS-4
1516 Ninth Street
Sacramento, CA 95814

Re: Docket No. 17-AAER-09, Tub Spout Diverters

Our organizations support the Test Plan for Tub Spout Diverters filed this day by the four California Investor Owned Utilities – SoCalGas®, Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE).

We have reviewed and commented on this plan during its preparation, and we believe that the extensive testing proposed for this product category is warranted, in large part due to inadequacies in the current ASME test procedure for these products. We note that the initial battery of tests will address questions regarding automatic reset diverters posed by the EPA WaterSense Program, as well as data accuracy, adverse water quality, and the savings factor that can reliably be claimed when leakage is eliminated. We also support a second phase of testing to evaluate the impact of an extended life cycle on product performance and to assess the variability of performance of sample products of the same brand and model as an indicator of quality control.

Completion of this test plan should lay a strong foundation for the commission's consideration of revisions to the current test procedures and performance requirements for these products.

Thank you for your attention to these views.

Sincerely,

Edward R. Osann
Senior Policy Analyst
Natural Resources Defense Council

NATURAL RESOURCES DEFENSE COUNCIL

1314 2ND STREET | SANTA MONICA, CA | 90401 | T 310.434.2300 | F 310.434.2399 | NRDC.ORG

Joanna Mauer

Joanna Mauer
Technical Advocacy Manager
Appliance Standards Awareness Project