

*Appliance Standards Awareness Project
Natural Resources Defense Council
Northwest Energy Efficiency Alliance*

September 22, 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 (DOE) Notice of Proposed Rule (NOPR) for amending the energy conservation standards for Commercial Pre-rinse Spray Valves (CPSVs).

We appreciate this opportunity to provide the following comments about the NOPR document. We support DOE efforts to meet its statutory obligation of updating the current standard of 1.6 gallons per minute of water flow (gpm), adopted under the Energy Policy Act of 2005 (EPA 2005) and in effect since January 2006.

At the time of the July 28, 2015 public meeting on both the test procedure and the NOPR, it was clear that DOE had access to limited technical and market data regarding CPSVs. This was due to a lack of response by manufacturers to DOE information requests, as confirmed by manufacturer representatives present at the public meeting. Since the public meeting the California investor owned utilities (CA IOUs) have conducted additional research on CPSVs at Pacific Gas & Electric's Food Service Technology Center (FSTC). The following comments to the NOPR for CPSVs reflects our understanding of the results of this recent research.

1. The signatories recommend a single product class for all covered CPSVs.

Joint comments submitted to this docket by ASAP, the Alliance to Save Energy, and NRDC dated November 14, 2014 recommended that "DOE should consider the establishment of separate product classes for pre-rinse spray valves." Based on DOE's subsequent findings and the CA IOUs recent research we now recommend that the DOE standard for CPSV include a single product class. The CA IOU research found that customers do not currently purchase CPSVs for "light duty", "standard duty" and "heavy duty" applications corresponding to the proposed product classes. We believe that if the DOE creates three product classes defined by spray force within the standard, each with its own maximum allowable flow rate, that the most likely effect would be to drive the market to the "heavy duty" performance class, which is the class with the highest flow rate. Retaining a single product class should help preserve the range of flow rates observed across products in the CPSV market. The CA IOU's research found that there is some market differentiation between CPSVs intended for cleaning dishware

before sanitizing in a commercial dishwasher, and CPSVs intended for pot and pan cleaning. DOE may wish to consider product classes based on such existing market differentiation during the next update to the standards.

2. The signatories support the addition of a spray force measurement based on ASTM Standard F2324-13.

Joint comments submitted to this docket by ASAP, the Alliance to Save Energy, and NRDC dated November 14, 2014 supported the consideration of other metrics in addition to flowrate in revisions to the test procedure. The signatories support DOE's proposal to incorporate the provisions of ASTM F2324-13 "Standard Test Method for Prerinse Spray Valves" pertaining to flow rate and spray force measurement, including test methods and definitions. Additionally, we support DOE's proposal to add a requirement to the standard that manufacturers measure and report spray force. This information will help stakeholders better understand CPSV product performance and help inform the incorporation of this metric into a future rulemaking. Collection of spray force product data will also inform the EPA Watersense program and other efforts to improve water and energy efficiency in commercial kitchens.

3. The signatories recommend that DOE amend the standard for CPSVs to include a maximum flow rate of 1.24 gpm applicable to all CPSVs.

The information that DOE presented at the public meeting suggests that 1.24 gpm, which is the maximum technologically feasible efficiency level for the proposed "heavy-duty" product class of CPSVs, would realize significant water and energy savings over the current standard while maintaining user satisfaction for all CPSVs. 1.24 gpm is also the highest efficiency level that still maintains a positive life cycle cost (LCC).

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

Sincerely,



Christopher Granda
Senior Consultant
on behalf of
Appliance Standards Assistance Project (ASAP)



Edward R. Osann
Senior Policy Analyst
Natural Resources Defense Council

A handwritten signature in black ink that reads "Louis Starr". The signature is written in a cursive style with a large, looped initial "L" and "S".

Louis Starr, P.E.
Energy Codes and Standards Engineer
Northwest Energy Efficiency Alliance