

Garcia, Daniela

From: Marc Esser <marc@negawattconsult.com>
Sent: Monday, May 22, 2017 8:38 AM
To: Garcia, Daniela
Cc: Bo White
Subject: [EXTERNAL] Re: FW: WS Bath & Shower Diverter Next Steps

Categories: Follow Up

Will review asap, thx

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Marc Esser
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On May 22, 2017 08:33, "Garcia, Daniela" <DGarcia3@semprautilities.com> wrote:

Marc,

Mary passed this along regarding where Energy Solutions is at with Tub Spout Diverter. Can you please review the attachment and her email. There is NOI that was issued by Water Sense that is pending a response. The NOI is an open process so there isn't a defined comment period. See email in attachment (pg.8) from March stating they had a few months.

Based on the timing I can have Mary let Energy Solutions respond to this NOI or we can take it from here. Please let me know your thoughts at the earliest.

Daniela Garcia

SoCalGas Customer Programs

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DGarcia3@semprautilities.com

From: Anderson, Mary [mailto:M3AK@pge.com]
Sent: Thursday, May 18, 2017 11:23 PM
To: Garcia, Daniela <DGarcia3@semprautilities.com>
Subject: [EXTERNAL] FW: WS Bath & Shower Diverter Next Steps

Daniela,

I just debriefed with ES. They haven't completed the analysis on the tub spout diverters. Water Sense has issued a Notice of Intent (attached) and we need to respond to the questions outlined in the NOI. Here are the ideas on how to respond to the NOI. We can have Negawatt respond or I can have Energy Solutions respond. It is up to you. Let me know if you have questions. Thanks!

Mary

Next Steps

- We will conduct more research to answer EPA's questions they outlined in the NOI, including outreach to industry experts (e.g., test labs, NRDC, manufacturers, water utilities) who may provide input on scope, testing, labeling, marketing etc.

- We will reach out to test labs (see below table) to inquire about conducting a series of tests to determine:
 1. the appropriate savings factor(s) across a range of real-world scenarios, as requested by EPA,
 2. if the life-cycle test should be increased from 15,000 cycles to perhaps 20,000 or 25,000 cycles to better reflect product durability and lifetime, and
 3. how various factors (e.g., water hardness, water pH) could potentially cause a bath and shower diverter to leak in real-world applications, as requested by EPA.

The amount of time and cost it will take to conduct testing may pose a challenge in submitting data to EPA in a timely manner. As such, we will try to obtain information on test time and cost from the test labs as soon as possible.

- We will work in collaboration with NRDC, as they have been involved in the WaterSense diverter process and they are well-connected in the industry. We have already been in preliminary discussions with Ed Osann of NRDC with respect to the potential Title 20 update for tub spout diverters. Also, Mr. Osann previously spoke with Gauley Associates to conduct life-cycle testing of diverters, and so we plan on contacting them about potential testing.

Plumbing Fittings Test Labs

Company	Location	Notes
Gauley Associates	Canada	Recommended by NRDC. Works closely with John Koeller of MaP Testing
BR Laboratories, Inc.	Huntington Beach, CA	CEC-Approved Test Lab
IAPMO R&T Laboratory	Ontario, California	CEC-Approved Test Lab
Pfister - Spectrum Brands Hardware and Home Improvement	Lake Forest, CA	CEC-Approved Test Lab
U.S. Analytical Laboratories	Fullerton, CA	CEC-Approved Test Lab

Thank you,

Sarah

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