

11/10/2014

To: Commissioner Andrew McAllister,
Mr. Harinder Singh, and Tuan Ngo, P.E.
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Proposed Legislation with Mandatory Flow Reductions at Fixtures

There is a growing body of evidence, that the push for water conservation through installation of low flow and metered fixtures, will increase the likelihood of opportunistic premise plumbing pathogen (OPPP) re-growth in building plumbing systems. The exact reasons for this remain unclear.

These concerns are not trivial. The Centers for Disease Control has recently acknowledged that OPPPs are now the primary source of waterborne disease (and a majority of deaths from outbreaks) in the United States, adversely impacting the health of thousands of consumers each year. While it is possible and even likely, that future research will give us insights to change design and installation of these devices in a manner that does not threaten public health, at present that knowledge base does not exist. Hence, simply mandating lower flow rates in fixtures, has potentially serious adverse public health consequences. The likelihood of increased consumer deaths and illnesses from OPPP exposure should be considered as an unintended consequence of any well-intentioned law that mandates such devices.

Please contact me at 540 231-7236 if you have questions about this letter.

Regards,



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