Responses to public comments on SSC-II.M "Demand-side energy efficiency activities for installation of low-flow hot water savings devices"

1. The SSC WG has reviewed the public comments that were received on the top-down draft methodology for energy savings from installation of low-flow showerheads. The methodology presents two options for calculating emission reductions i.e. use of a default energy savings value for water heating energy savings (per showerhead) and an approach based on monitoring. The monitoring approach calls for: (a) One-time measurements of project and baseline showerhead flow rates; and (b) Shower water consumption measurements for at least two, thirty-day periods.

2. Two organizations submitted comments. The first organization indicated that they support the methodology, but are of the opinion that it should be expanded to other types of faucets and not require integrated low-flow showerheads (or other faucet types), and they question the validity of the default savings value(too low). The other organization also strongly stressed that the default value was not appropriate (too low) and that the methodology should be expanded to other types of faucets and not require integrated low-flow showerheads (or other faucet types). Furthermore, both organizations suggest a monitoring approach that involves some stipulated and some measured values.

3. The SSC WG proposed the default savings value approach, because the group believes that such an approach would significantly reduce transaction costs. However, none of the public commenter supported this concept and both felt the value provided by the SSC WG was too low if such an approach was to be used. However, the SSC WG believes that the data the commenter provided could not support a substantively higher default value than the one proposed by the SSC WG. Therefore, the SSC WG has removed a default savings value from the methodology.

4. With respect to the requirement for fixtures with integral, non-removable flow restrictors, the SSC WG disagrees with the commenter's suggestion that plastic flow restriction inserts be allowed. This is because the SSC WG evaluates that the CER risk (overestimated emission reductions) is too high for these very low-cost and easily disabled or removed measures. Integrated showerheads, or faucets, are much more expensive to replace if a user wishes to disable the low-flow function and they are more reliably confirmed to be in operation during any required surveys as compared to plastic inserts.

5. With respect to allowing other faucet types to be included in the methodology, the SSC WG is concerned that such low-flow devices will not necessarily save water (if, for example, the faucet is used for filling containers (such as a cooking or dish washing pot with a fixed amount of water) nor save water heating energy (if the faucet is used only for cold water). However, the SSC WG reluctantly is including such faucets in the methodology on the assumption that proper and reliable monitoring will be conducted.

6. With respect to monitoring requirements, one commenter indicated that the monitoring approach was reasonable. The other commenter indicated that the requirements should be left to the PP and specified in the PDD for the DOE to validate as appropriate. This second commenter did however seem to indicate that the monitoring approach in the methodology might be acceptable for showerheads and would address the concerns of the SSC WG with other types of faucets. Therefore, the SSC WG, while removing the default savings value, is retaining the monitoring requirements as written.