



September 13, 2013

Majority Leader Harry Reid
 522 Hart Senate Office Building
 Washington, D.C. 20510-2803

Minority Leader Mitch McConnell
 317 Russell Senate Office Building
 Washington, D.C. 20510-1702

Dear Senators Reid and McConnell:

On behalf of the undersigned organizations, we would like to express our strong opposition to Amendment #1913 filed by Senator Rand Paul to S. 1392, *The Energy Savings and Industrial Competitiveness Act of 2013*. This amendment would repeal the national plumbing efficiency product standards that have been in place since the passage of the 1992 Energy Policy Act, and would also prohibit enforcement of those standards. In our view, passage of this amendment would set the U.S. back two decades and would eliminate the continued water and energy savings that have benefitted the nation.

There are multiple reasons to keep these standards in place:

1. **Uniform national standards reduce regulation** on businesses and governments because one set of national regulations is more easily enforced than a patchwork of up to 50 different state regulations. The standards were enacted in 1992 by Congress for just that reason: 13 states had already adopted separate plumbing requirements. Making a uniform national standard was a benefit to business and manufacturers of plumbing products in 1992 and it remains a benefit to them now.
2. **Uniform national standards save water and save energy in homes and businesses, thus saving costs for these users.** National plumbing efficiency standards (and the implementing plumbing codes that support them) have effectively reduced national consumer demand for water by 8 per cent on average. This demand reduction amounts to more than 3.5 billion gallons of water per day in savings, thus reducing pressure on water supplies and the environment. The dollar value of these savings to water utilities translates to date to at least \$7.5 billion nationally. Adding the benefit from the energy savings further increases the dollar value to \$35 billion nationally.

The United States cannot afford to ignore these clear benefits. The undersigned organizations thank you for your leadership in opposing this amendment.

Sincerely,

Alliance for Water Efficiency
Alliance to Save Energy
American Council for an Energy-Efficient Economy
American Society of Plumbing Engineers
Amy Vickers & Associates, Inc.
Arizona Municipal Water Users Association
Association of California Water Agencies
Austin Water Utility
Center for Neighborhood Technology
Charles River Watershed Association
Consumers Union
ELKAY

Gauley Associates, Ltd.
Gerber/Danze/Globe Union
Global Water Policy Project
Greater Edwards Aquifer Alliance
H2o Applied Technologies
International Association of Plumbing and Mechanical Officials
International Code Council
Jones River Watershed Association
Kohler Co.
Massachusetts Rivers Alliance
Metropolitan Planning Council
Monterey Peninsula Water Management District
National Association of Clean Water Agencies
National Association of Water Companies
Natural Resources Defense Council
Neponset River Watershed Association
New York City Environmental Protection
Openlands
Pacific Institute
Plumbing, Heating and Cooling Contractors – National Association
Plumbing Manufacturers International
Round Rock, Texas
Texas Water Foundation
Sloan Valve Company
TOTO USA
T & S Brass
United Association of Plumbers and Pipefitters
US Water Alliance
Wastewater Education
Water Environment Federation

Also opposing the amendment:

Albert Nahman Plumbing
SDB Consulting

cc: The Honorable Ron Wyden
cc: The Honorable Lisa Murkowski
cc: The Honorable Rand Paul