

**Opening Statement of
Mel Hall-Crawford, Director of Energy Programs
Consumer Federation of America
For the Department of Energy
Energy Conservation Program Webinar on:
Test Procedures for Showerheads
EERE-2020-BT-TP-0002; RIN 1904-AE85
September 3, 2020**

Good afternoon, my name is Mel Hall-Crawford. I am the Director of Energy Programs at the Consumer Federation of America. CFA is one of the nation's largest consumer organizations representing over 250 state, local and national consumer groups. For more than 20 years, CFA has supported and promoted cost-effective energy and water efficiency policies and practices. We have participated in countless proceedings at the federal and state levels in support of greater efficiency for consumer products.

We are here today because we have long held that efficiency standards, be they water and/or energy (standards), save consumers on their utility bills.

We believe that this proposal to change the definition for showerheads, that would have each nozzle in a showerhead counted as an individual showerhead in the device, could lead to an increase water and energy consumption and higher utility bills for consumers. We seriously question the need to change the definition. Our sister consumer organization, Consumer Reports did testing of showerheads and in its report made the point that 'the best showerheads tested provided a pleasing flow while meeting the current federal flow-rate standard'.

The Department's proposal did not provide a cost impact analysis of the impact on consumers. This is critical information that we respectfully request that the Department furnish before any further action is taken. We also request an extension of 90 days for the comment period so that the Department can provide the cost impact analysis and then give the public an opportunity to review and comment on the new data. Additional time is also necessary so that information from this webinar can be used or responded to in comments to the Department.

Thank you for your attention.