MEMORANDUM

TO: U.S. Department of Energy (DOE)

FROM: Stephanie Salmon, Plumbing Manufacturers International

DATE: November 14, 2025

RE: Ex Parte Communication – DOE meeting with Plumbing Manufacturers International on November 7, 2025 - Proposed Rule for Faucets

Attendees:
DOE:
Audrey Robertson, Assistant Secretary, Energy Efficiency and Renewable Energy
Jeffrey Novak, Principal Deputy General Counsel
Joshua Campbell, Deputy General Counsel, Energy Efficiency and Clean Energy Demonstrations
Lou Hrkman, Principal Deputy Assistant Secretary, Energy Efficiency and Renewable Energy
Michael Helmer, Chief of Staff, Energy Efficiency and Renewable Energy
Rachael Overbey, Special Assistant and Acting Director of External Affairs, Energy Efficiency and Renewable Energy

PMI:
Kerry Stackpole, CEO/Executive Director, Plumbing Manufacturers International
Jennifer Reid, on behalf of Delta Faucet Co.
Peggy Lynch, Vice President, Assistant General Counsel, Litigation and Government Affairs, Masco Corp. (Delta Faucet Company)
Brian O'Laughlin, Senior Legal Director, Litigation & Government Affairs, Kohler Co.
Dan Rieland, Manager, Codes and Standards, Kitchen & Bath, Kohler Co.
Stephanie Salmon, Washington Representative, PMI

Meeting Summary

This memorandum summarizes the key points discussed during a virtual meeting on Friday, November 7, 2025, with Plumbing Manufacturers International (PMI) and U.S. Department of Energy (DOE) officials regarding the agency's Notice of Proposed Rulemaking for the Energy Conservation Program: Energy Conservation Standards for Faucets [EERE-2025-BT-STD-0021].

PMI plumbing manufacturing members Delta Faucet Company and Kohler Company expressed concern that the proposed rule "rescinding the current water use standards for faucets," and if finalized, the existing maximum flow rates for faucets would revert from the current federal standard of 2.2 gallons per minute (gpm) to the statutory rate of 2.5 gallons developed 30 years ago. Specifically, the plumbing manufacturers highlighted how the DOE proposal would:

- Provide a competitive advantage to foreign faucet manufacturers, while adding significant expenditures to U.S. manufacturers.
    - Foreign manufacturers, many from China that already sell higher flow rate faucets outside the U.S., would flood the marketplace upon the effective date of a higher flow rate.
    - For over thirty years, U.S. faucet manufacturers have employed thousands of workers and spent millions of dollars on R&D here in the U.S. on the development of faucets to enhance consumer experience.
    - If finalized, the proposed rule would force U.S. faucet manufacturers to redesign, revise complex manufacturing processes, test, certify, market and create new packaging for the proposed higher flow rate for faucets to remain competitive in those U.S. jurisdictions that would allow for a new higher 2.5 gpm flow rate.
    - If finalized, the proposed rule would add supply chain pressure on sellers to clear existing inventory, since any design change invalidates previous certifications.
    - Most U.S. manufacturers do not produce faucets with higher flow rates outside of the U.S. (question was posed by DOE).
- Increased faucet flow rates may not enhance customer experience due to limitations in plumbing infrastructure in homes and commercial buildings. For example, since the mid-1990s, homes have been built based on a maximum flow rate of 2.2 gpm and 1.8 gpm in multiple states. Allowing the sale of higher flow faucets does not necessarily increase water pressure from the overall system.

DOE posed questions on changes made earlier this year to the definition of a showerhead. PMI noted that the member companies remain neutral on the definition change, as it does not require product redesign, making it significantly easier to manage than other proposed changes.

Plumbing manufacturers underscored that DOE reconsider the impacts this proposal will have on U.S. faucet companies and, at a minimum, incorporate a three-to-five-year compliance timeline and clarify that no additional testing would be required.