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IA Comments on Proposed Irrigation Controller Requirements

Please see attached comment letter.

Additional submitted attachment is included below.

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April 16, 2026

California Energy Commission
Attn: Docket Unit, MS-4
Docket No. 17-AAER-10
715 P Street
Sacramento, CA 95814

Re: Docket#17-AAER-10, Project Title: Irrigation Controllers, Revised Draft Staff Report and Proposed Regulatory Language

Dear CEC Staff:

Please accept these comments on behalf of the Irrigation Association (IA), the national trade association representing more than 1,000 companies that manufacture, design, install and manage irrigation systems across public and private landscapes. The irrigation industry is an essential part of improving our quality of life through reliable food supply and vital green spaces in our communities. IA represents the full value chain of irrigation equipment and services in the United States: from R&D and component manufacturing (valves, emitters, pumps, controllers, sensors) to distribution, system design, installation, and after-sales support. Our members range from global manufacturers to small and medium-sized enterprises supplying farms, greenhouses, golf, sports turf, parks, campuses, and commercial/residential landscapes.

The IA appreciates the opportunity to provide comments on the California Energy Commission's Proposed Irrigation Controller Requirements (Proposed Requirements), including the Revised Draft Staff Report and Proposed Regulatory Language released in March 2026. Based on our review of those materials, the prior docket comments, and the issues raised throughout the engagement process, the IA believes the Proposed Requirements are moving in a constructive direction, particularly where they build more closely on EPA WaterSense. At the same time, several technical and implementation issues remain that warrant clarification or revision before the rule is finalized. Here are our comments:

1. <u>The revised proposal is significantly improved and is now closer to WaterSense, but there are still important differences that should be harmonized.</u>

    a. *General alignment with WaterSense*: The IA has long supported EPA WaterSense and has been deeply engaged in WaterSense irrigation specifications and related

professional programs. We therefore appreciate that the revised proposal moves in a better direction by building more closely on the existing WaterSense framework for weather-based irrigation controllers and bypass soil moisture-based irrigation controllers.

b. *The proposal is closer to WaterSense, but not identical*: At the same time, the proposal should be described as closer to WaterSense, not as fully mirroring WaterSense. Important differences remain, including:

   i. CEC's draft proposal includes on-demand soil moisture-based controllers. EPA WaterSense in its February 7, 2024 comments explained that WaterSense does not have a specification, test method, or published water-savings basis for on-demand products comparable to the WaterSense bypass framework. The revised proposal appears to keep on-demand products in scope without an analogous performance test regime. Since this product category does not yet exist and is not supported by WaterSense, it should be excluded from the CEC's requirements.
   ii. Section 1605.3(x)(2)(B) of the CEC draft proposal would require controllers to preserve programmed irrigation settings, and soil-moisture settings if applicable, for a minimum of seven days after loss of power and without relying on an external battery backup. WaterSense also requires preservation of programmed settings after power loss, but the WaterSense weather-based specification does not include that same express seven-day minimum in the supplemental capability language. The IA requests the CEC to revert to the WaterSense requirement.
   iii. Section 1605.3(x)(2)(E), and especially Section 1605.3(x)(2)(E)(5), would go beyond the WaterSense watering-restriction framework. WaterSense requires controllers to accommodate prescribed day-of-week schedules, even/odd day or 2-to-7-day intervals, prohibited times of day, and complete shutoff. The CEC draft includes those same elements, but then adds a further requirement that weather-based or soil-moisture-based mode shall be capable of accommodating mandated irrigation restrictions. This catch-all is broader than the WaterSense list, and it may not be possible for all irrigation controllers to meet all possible, future drought restrictions especially atypical ones that may be used by a limited number of water utilities. The IA requests the CEC to revert to the WaterSense requirement.
   iv. Section 1605.3(x)(2)(G) would expand the fallback trigger beyond the current WaterSense formulation. The proposed regulatory language states that a controller must be capable of reverting to either a proxy of historical weather data or a percent adjust feature if "the primary source of weather information or the soil moisture sensor mechanism signal is lost." By contrast, the WaterSense weather-based controller specification requires fallback only "if the primary source of weather information is lost." WaterSense does not include this added soil-moisture-signal trigger in the

weather-based fallback requirement. The IA requests the CEC to revert to the WaterSense requirement.

2. IA supports the revised approach on packaging and modular compliance. The IA supports the revised direction away from mandatory bundled packaging for the following reasons.

    a. *Eliminating mandatory bundled packaging is a significant improvement*: IA supports CEC's decision not to require non-integrated compliant products to be packaged together. CEC also explains that stakeholders raised concerns about increased costs and environmental impacts from mandatory bundled packaging. That revision is important because the irrigation controller market includes a substantial number of modular and retrofit configurations. Add-on devices, plug-in devices, wireless hubs, and other accessory pathways can provide a practical way to upgrade existing systems and preserve otherwise functional equipment.

    b. *This revised approach is also more consistent with WaterSense*: CEC's revised direction is also more consistent with how WaterSense handles add-on and plug-in devices. WaterSense does not require those devices to be packaged with compatible base controllers. Instead, WaterSense requires the product documentation and certification framework to identify compatible base controller models and other relevant details. That is a more practical model for the market and one that accommodates retrofit market, which is a significant source of water-saving upgrades to existing base landscape irrigation controllers.

    c. *MWELO helps support appropriate smart-controller pairing in covered projects*: The IA supports CEC's general direction in part because California already has another important regulatory framework helping to drive proper smart-controller deployment in covered landscape projects. Under MWELO, automatic irrigation controllers are required and must use evapotranspiration or soil moisture sensor data and utilize a rain sensor. The MWELO text and final statement of reasons both confirm that this requirement is intended to ensure irrigation scheduling is based on sensor data. The MWELO requirements buttress and support the reasonableness of CEC's revised proposal. California already has a parallel design-and-installation framework that helps ensure appropriate pairing and use in many new and rehabilitated landscapes. That existing framework makes it more reasonable for CEC to avoid a rigid packaged-together model at the product level.

3. The final package-marking provisions should be refined to reflect the actual market

    a. *Weather-based compatibility*: For weather-based compatibility, IA recommends that any base-controller package-marking obligation be limited to identifying compatible plug-ins or add-ons *from the same manufacturer* that are necessary for the controller to become a compliant weather-based controller. That approach would be technically workable and more realistic for weather-based compliance

pathways, where the compatibility relationship is often brand-specific and where same-manufacturer ecosystem pairing is common.

b. *Soil moisture-based compatibility*: For soil moisture-based compatibility, the IA recommends a more flexible approach. The WaterSense soil moisture-based product market remains limited, and not all controller manufacturers offer a compatible soil moisture sensor. CEC's revised staff analysis states that the WaterSense product list showed only four soil moisture add-on or plug-in models from two manufacturers as of the report date, and the 2024 IOU comments likewise raised concerns about the limited market and the fact that not all controller manufacturers offer a compatible soil moisture sensor. The revised staff analysis says a soil moisture-based controller standard would provide the greatest water savings among the alternatives CEC considered. For labeling purposes, the IA requests that the CEC clarify that all compatible soil moisture sensors must be listed on product packaging unless and until such time as the controller manufacturer makes and obtains the WaterSense label for its own soil moisture sensor.

4. IA supports the revised scope and exclusions

   a. *Key exclusions*: IA supports the continued exclusion of agricultural irrigation controllers, golf-course irrigation controllers, and manual watering timers. Those exclusions help keep the proposal targeted to the intended landscape market and avoid sweeping in product categories with different operating conditions, design assumptions, and policy considerations.

   b. *Battery-operated products*: IA also supports the revised treatment of battery-operated landscape irrigation controllers. The revised staff analysis explains that CEC is proposing to exempt battery-operated irrigation controllers from standards that would require Wi-Fi connection or otherwise increase power consumption. That is a practical and technically appropriate adjustment. Battery-operated products are used in a variety of real-world applications where power availability, wiring limitations, or site constraints make them necessary, and the final rule should continue to recognize those realities.

5. Continuing Availability of Other Add-on and Plug-in Devices in the Marketplace. In practice, add-on and plug-in devices include more than just products related to weather-based and soil moisture-based control. They can also include communication modules, zone expansion modules, battery-backup components, flow sensors, pump-start relays, and master-valve controls. The IA is concerned that the proposed definition of "add-on device" or "plug-in device" in Section 1602(x)(1), together with the operative provisions in Sections 1605.3(x)(2)(A), (I), (J), and (K), could be read too narrowly or have unintended consequences for these other products. IA recommends clarifying the definition and, if necessary, the operative provisions to make clear that the proposal is directed only to weather-based and soil moisture-based compliance pathways and is not intended to make other categories of add-on and plug-in devices unsaleable.

6. The effective date should be tied to January 1 of a calendar year. IA recommends that the effective date be revised to January 1 of the first calendar year that is at least one year after adoption of the final rule, rather than simply one year from the date of adoption. CEC's workshop materials indicate that the current proposal uses an effective date one year from adoption and allows products manufactured before the effective date to continue to be sold in California. A January 1 implementation date would better align with inventory cycles, sales cycles, seasonal demand patterns, and product planning across manufacturers, distributors, retailers, and contractors.

7. Conclusion. The IA appreciates the progress reflected in the revised proposal. The rule is now significantly better because it relies more heavily on the existing WaterSense framework for weather-based and bypass soil moisture-based controllers, abandons the earlier bundled-packaging approach, and includes more practical scope refinements and exceptions. With the additional refinements discussed above, CEC can preserve modularity, avoid disadvantaging high-saving soil moisture-based pathways, maintain appropriate distinctions between WaterSense-aligned and California-specific elements of the rule, and finalize a standard that is both technically sound and practical to implement.

Thank you for your consideration.

Sincerely,

Andrew D. Morris

Andrew D. Morris
Irrigation Association
Director of Policy and Technical Affairs