

<b>DOCKETED</b>	
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<b>Project Title:</b>	Irrigation Controllers
<b>TN #:</b>	269505
<b>Document Title:</b>	Bryce Carnehl Comments - Manufacturer Comments
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*Comment Received From: Bryce Carnehl  
Submitted On: 4/16/2026  
Docket Number: 17-AAER-10*

## **Manufacturer Comments**

*Additional submitted attachment is included below.*



April 16, 2026

California Energy Commission  
Docket Unit, MS-4  
715 P Street  
Sacramento, CA 95814-5512

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

CEC Staff,

Thank you for the continued opportunity to participate in feedback and comment sessions for the Proposed Efficiency Standards for Landscape Irrigation Controllers developed by the California Energy Commission, including the latest Revised Draft Staff Report and Proposed Regulatory Language released in March 2026. Upon reviewing the revised language, we acknowledge that CEC staff have made clear and constructive modifications to the proposal in support of industry comments and real-world applications, while still ensuring water efficiency and savings through landscape irrigation controllers.

We do believe there are areas of the revised proposal that require clarification or revision before a decision is made. Our comments and requests for clarification are listed below:

### **Alignment with EPA WaterSense**

Hunter Industries has long supported the EPA WaterSense program. We first achieved certification in 2013 and have been adding certified controller solutions to the market ever since. Great strides have been taken to more closely align the Revised Proposal with EPA WaterSense, yet critical differences remain.

- a. The draft proposal continues to include on-demand soil moisture-based controllers. The EPA does not have a specification, test method, or published water-savings basis for these types of products within the WaterSense framework. Since this product category does not exist within EPA WaterSense, it should be eliminated from the Revised Proposal.
- b. 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. This proposal exceeds the established WaterSense requirement while also exceeding the definition of an automatic irrigation controller as defined by MWELo. We request that the CEC align with EPA WaterSense and MWELo regarding controller program preservation.
- c. Section 1605.3(x)(2)(E), and especially Section 1605.3(x)(2)(E)(5), would go beyond the WaterSense watering-restriction framework. In addition to the EPA framework, the Revised Proposal includes further requirements that weather-based or soil-moisture-based modes shall be capable of accommodating mandated irrigation restrictions. Managing unidentified drought-restriction formats with currently listed EPA WaterSense products is both a challenge and an

unknown. We request that the CEC align with EPA requirements regarding the water-restriction framework.

d. 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,” implying that weather sensors and soil moisture sensors are to be used in conjunction with an irrigation controller. EPA WaterSense weather-based controller specifications require 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. We request that the CEC align with EPA WaterSense on this requirement.

The EPA framework has been a widely adopted program for Hunter, our manufacturer peers, and the landscape industry for decades and sets a historical precedent for water-efficiency certification practices. Aligning the Revised Proposal with this established program reduces confusion and challenges in the market, creating a more palatable adoption environment in California.

### **Packaging Requirements**

Hunter Industries supports the CEC’s decision not to require total packaging requirements for add-on and plug-in devices and irrigation controllers. This revision acknowledges the complexity and adaptability of irrigation technology in delivering water efficiency while maintaining a wide variety of choices for consumers. We are asking for clarity on final package-marking provisions:

- a. Section 1607(d)(14)(B) states: “Each package of base landscape irrigation controller manufactured on or after one year from the date that the proposed standards are adopted, that relies on an add-on or plug-in device for compliance shall be marked permanently and legibly in an accessible and conspicuous place with information about the manufacturer and model number of compatible add-on or plug-in devices that, when connected, makes the base landscape irrigation controller compliant.” It is unclear what compliance the package information must reference. We request that the CEC require package compliance language to reference EPA WaterSense certification in order to align with existing marketing and branding compliance in similar markets.

### **Effective Date**

CEC materials indicate that the current proposal uses an effective date of one year from adoption and allows products manufactured before the effective date to continue to be sold in California. We request 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. 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.



Hunter Industries appreciates the continued opportunity to participate as a valued stakeholder in this proposal review process. We commend the CEC for evaluating previous comments and for the strides taken to improve the proposal, making it more applicable to real-world scenarios, technically sound, and aligned with water conservation targets.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bryce Carnehl", with a stylized flourish at the end.

**Bryce Carnehl**

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