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Irrigation Controllers Revised Staff Analysis

Additional submitted attachment is included below.

Appliance Standards Awareness Project

April 17, 2026

Dr. Soheila Pasha
California Energy Commission
Docket Unit
715 P Street, Sacramento, CA 95814

RE: Docket No. 17-AAER-10: Landscape Irrigation Controllers

Dear Dr. Pasha:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) on the California Energy Commission's (CEC's) Revised Staff Analysis for landscape irrigation controllers. We appreciate the opportunity to provide input to the Commission.

We are pleased that CEC is moving forward with the rulemaking for landscape irrigation controllers. CEC's proposal would require irrigation controllers to use soil- or weather-based sensing technologies,¹ a meaningful step toward reducing unnecessary outdoor water use. Establishing this requirement would help support the state's water conservation goals. CEC estimates that, after full stock turnover, these sensor-based controllers would reduce annual outdoor water use by about 50 billion gallons and electricity use by about 190 GWh statewide.² The proposal is also highly cost-effective: consumers would save \$942 on average over the lifetime of an irrigation controller, with a payback period of less than six months.³

We encourage the Commission to monitor market outcomes and support consumer education. While we appreciate the rationale in allowing sensors to be sold as separate add-ons for non-integrated controllers, we would encourage the Commission to monitor how the market reacts to these requirements and to pair this allowance with consumer education outreach. Market monitoring of the adoption rates of different product types would help confirm that anticipated water savings are being realized. In addition, since the anticipated savings are only realized when sensors are properly implemented, education is important to ensure homeowners and landscape professionals understand the benefits of these sensors and how to install, configure, and use them.

Thank you for considering these comments.

Sincerely,

¹ p. 1, Revised Staff Analysis of Proposed Efficiency Standards for Landscape Irrigation Controllers. efiling.energy.ca.gov/GetDocument.aspx?tn=268960&DocumentContentId=106153

² *Ibid.*

³ *Ibid.*

A handwritten signature in cursive script that reads "Jeremy Dunklin".

Jeremy Dunklin, PhD
Senior Technical Advocacy Associate
Appliance Standards Awareness Project