

DOCKETED

Docket Number:	17-AAER-12
Project Title:	Low-Power Mode
TN #:	271410
Document Title:	Irrigation Association Comments - LPM and Irrigation Controllers
Description:	N/A
Filer:	System
Organization:	Irrigation Association
Submitter Role:	Public
Submission Date:	7/14/2026 5:45:12 AM
Docketed Date:	7/14/2026

Comment Received From: Irrigation Association
Submitted On: 7/14/2026
Docket Number: 17-AAER-12

LPM and Irrigation Controllers

Additional submitted attachment is included below.

July 14, 2026

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

Re: Docket No. 17-AAER-12 — Voluntary Performance Framework for Low-Power Modes

Dear Commissioners and Staff:

Please accept these comments on behalf of the Irrigation Association regarding the California Energy Commission's draft staff report for the Voluntary Performance Framework for Low-Power Modes. IA is concerned that treating irrigation controllers as an "in-focus" product category risks diverting manufacturer, engineering and compliance resources away from the water-efficiency innovation that is most important to California, the irrigation industry and communities facing long-term water-supply challenges.

The Irrigation Association is the national trade association representing companies and professionals that manufacture, design, install, distribute and manage irrigation systems across agricultural, landscape, turfgrass, golf, commercial, residential and public-sector settings. IA's mission is to promote efficient irrigation, and its members include experts across the full irrigation channel to market, including manufacturers of controllers, sensors, valves, emitters, pumps and related technologies.

IA respectfully recommends that landscape irrigation controllers remain in scope, but be moved out of focus for Version 1.0 of the Voluntary Performance Framework for Low-Power Modes. CEC should be able to gather technical information on irrigation controllers, but irrigation controllers should not be subject to the initial in-focus participation targets, improvement-plan pathway or potential escalation contemplated for priority product categories.

The core issue is that irrigation controllers are not like many other products in this proceeding. For smart irrigation controllers, low-power operation may affect functions that directly enable water savings, including weather-data updates, sensor communication, soil-moisture monitoring, remote access, alerts, firmware updates, flow monitoring and irrigation adjustments based on real landscape conditions. With efficient water use central to IA's mission — and increasingly important for California and the nation — manufacturers and innovators should be focused on maximizing water savings from irrigation controllers, not on standby-power compliance work that could distract from that goal.

EPA WaterSense estimates that replacing a standard clock-based controller with a WaterSense labeled weather-based irrigation controller can save an average home nearly 7,600 gallons of water annually. By comparison, the indirect water use associated with smart-controller standby power is very small. The 2009 Lawrence Berkeley National Laboratory data cited in the CEC record found average standby power of approximately 4.2 W for smart controllers. At that level, a smart controller would use approximately 36.8 kWh per year if operating at that level for the full year. Applying a California grid-average water-consumption factor of 1.37 gallons per kWh, that represents roughly 50 gallons per year of indirect consumptive water use — very small compared with the direct water savings smart controllers are designed to achieve.

The comparison is even clearer using CEC's own assumptions in the separate irrigation-controller rulemaking, Docket No. 17-AAER-10. In the revised staff analysis for proposed landscape irrigation controller efficiency standards, TN 268960, CEC assumed that compliant controllers would increase

standby power by only 0.2 W, resulting in approximately 1.7 kWh per year of additional electricity use. Applying the same California grid-average water-consumption factor, that incremental standby-power increase represents only about 2.4 gallons per year of indirect consumptive water use. That amount is negligible compared with the water savings CEC expects from more efficient irrigation controllers.

Manufacturers are also already preparing for the requirements under Docket No. 17-AAER-10. That proceeding requires significant work on product design, testing, certification, labeling, packaging, weather-based and soil-moisture-based compliance pathways, battery-operated products, and related implementation issues. Placing irrigation controllers in focus in the low-power-mode framework at the same time would risk diverting the same technical teams away from the product work most directly tied to California's water-efficiency objectives.

IA does not object to CEC collecting reasonable information on low-power-mode performance for irrigation controllers. However, irrigation controllers should be treated differently from products whose low-power-mode energy use is not tied to water conservation. A low-power-mode framework that does not account for water-saving connectivity, sensing and control functions could inadvertently discourage the very capabilities California is relying on to reduce unnecessary outdoor water use.

IA also requests that CEC clarify the scope of the irrigation controller category in the Voluntary Performance Framework for Low-Power Modes so that it mirrors the landscape irrigation controller scope and related definitions used in Docket No. 17-AAER-10. Only landscape irrigation controllers should be included in scope. Agricultural irrigation controllers, golf course irrigation controllers, manual watering timers and other non-landscape irrigation controllers should be excluded because of the complexity, diversity and wide range of applications in those markets, and because those products were not the focus of the water-efficiency standards proceeding.

Accordingly, IA recommends that CEC revise the Voluntary Performance Framework for Low-Power Modes to classify irrigation controllers as in scope, out of focus for Version 1.0 and to clarify that the category is limited to landscape irrigation controllers consistent with Docket No. 17-AAER-10. CEC should continue to accept landscape irrigation-controller data and technical information, but should not establish initial participation targets for the category or treat failure to meet such targets as a basis for an improvement plan or potential regulatory action.

IA appreciates CEC staff's consideration of these comments and looks forward to continued engagement to ensure California's appliance-efficiency policies support meaningful water savings, compliance clarity and continued innovation in irrigation technology.

Sincerely,

Andrew D. Morris

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