

## DOCKETED

<b>Docket Number:</b>	15-WATER-03
<b>Project Title:</b>	Water Energy Appliance Rebate Program
<b>TN #:</b>	205008
<b>Document Title:</b>	California Retailers Association Comments: Comments on the Water Appliance Rebate Program
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Pamela Williams
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	6/12/2015 12:54:28 PM
<b>Docketed Date:</b>	6/12/2015

*Comment Received From: Pamela Williams*

*Submitted On: 6/12/2015*

*Docket Number: 15-WATER-03*

## **Comments on the Water Appliance Rebate Program**

*Additional submitted attachment is included below.*



June 11, 2015

Commissioner Andrew McAllister  
California Energy Commission  
1516 Ninth St.  
Sacramento, CA 95814-1512

RE: Docket No. 15-WATER-03 for the **Water Appliance Rebate Program**

Dear Commissioner McAllister:

The California Retailers Association submits these comments on the Water Appliance Rebate Program. We support the Governor's directive that the California Energy Commission and the Water Board develop a statewide appliance rebate program as one of many actions taken to continue energy efficiency improvements, and more immediately to reduce water consumption. Replacing less efficient home appliances with newer, more efficient ones will undoubtedly reduce consumption in a demonstrable and significant way.

We echo the comments and recommendations contained in the letter to you from the Association of Home Appliance Manufacturers. Of particular importance to the retail industry is the simplicity of the program for the consumer, and operational ease for the retailer. Factors such as limitations on the types of appliances covered, differences in rebate amounts, tiered rebates, and the number of steps required to accomplish the rebate all have the potential make the program more complicated for the consumer and result in less participation. "The simpler the better" for incentivizing consumer participation in a rebate program.

In addition to our plea for simplicity, we also concur with AHAM's recommendations that: 1) the program should not provide a minimum age requirement; 2) the program should not require that an old unit is in working order; and 3) there should be no minimum water level requirement. We would not support rebates *only* on Energy Star water appliances, but it would be acceptable to offer a higher monetary rebate to Energy Star appliances than to non-Energy Star appliances.

CRA members represent a significant majority of water appliance sellers, and we offer our assistance in developing the rebate program as well as advertising it and implementing it. We would be happy to put your staff directly in touch with major retailers of water appliances to coordinate development of the program if needed.

The California Retailers Association is the only statewide trade association representing all segments of the retail industry including general merchandise, department stores, mass merchandisers, fast food restaurants, convenience stores, supermarkets and grocery stores, chain drug, and specialty retail such as auto, vision, jewelry, hardware and home stores. CRA works on behalf of California's retail industry, which currently operates over 164,200 stores with sales in excess of \$571 billion annually and employing 2,776,000 people—nearly one fifth of California's total employment. The retail industry in California represents one in every four jobs in the State, a total of nearly 5 million jobs, and accounts for 17.8% of the State's GDP.

Sincerely,

A handwritten signature in cursive script that reads "P. B. Williams".

Pamela Boyd Williams  
Executive Vice President

cc: Donna Parrow  
Bruce Helft  
Kevin Messner, Association of Home Appliance Manufacturers