

DOCKETED

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Falcon Waterfree Technologies' Comments on Water Appliance Rebate Program

Additional submitted attachment is included below.



15- WATER- 03 Notice for California Energy Commission Water Appliance and Fixture Rebate Program Webinar

Dear Commissioners,

Falcon Waterfree Technologies appreciates the opportunity to provide comments to the California Energy Commission's (CEC) Water Appliance Rebate Program developing through Docket No. 15-WATER-03.

Falcon Waterfree Technologies, is a leader in sustainability and technology related to water conservation solutions within the commercial restroom industry- best known for our waterfree urinal technology. Falcon is a Los Angeles based company that has been heavily influenced and involved in promoting efficiency related to California's current state of water crisis.

While we appreciate the effort and information provided to the public in the initial webinar on May 28, 2015, we would urge the Commission and staff to include commercial rebate options in addition to residential options discussed during the webinar. The inclusion of commercial facilities in any state-wide rebate program is vital as the mandatory reductions required by Executive Order B-29-18 are not achievable unless both commercial and residential facilities are targeted. Including commercial indoor plumbing fixtures such as waterfree urinals, hybrid urinals and high efficiency flushometer valve water closets are all essential technologies that will assist in meeting these ambitious water reduction goals. According to the California Energy Commission (CEC) 443 billion gallons of water a year are used to flush toilets, urinals and faucets; by converting to water efficient fixtures put in place by Executive Order B-29-18 California can save 105.6 billion gallons a year. Additionally, there are over 1 million urinals installed in the state of California that will potentially need to be retrofitted to meet water efficiency standards put in place by SB 407 by 2019. By including all commercial urinal fixtures that utilize less than 0.125 gpf the state of California can utilize this state-wide rebate program to accelerate and meet the conservation goals related to SB 407 and build support for businesses to comply with Executive Order B-29-18.

There are currently successful rebate programs in place through water districts in many major Californian cities, such as Los Angeles. The Los Angeles Department of Water and Power (LADWP) offers a \$500 per fixture rebate to replace older, inefficient



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waterfed urinals to waterfree urinals. This \$500 per urinal fixture rebate is the best incentive to realize real water savings through facility retrofitting and to see drastic results should be replicated on a state-wide level. The commercial products offered through the LADWP rebate program, not just WaterSense certified products, should be offered and replicated in this state-wide program.

We at Falcon believe that this state-wide rebate program needs to include a commercial component, replicate current successful rebate programs and be supplementary in areas where rebate programs are not currently in place.

Sincerely,

Simon A. Davis

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