

## DOCKETED

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*Comment Received From: Ben Chou*

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**NRDC Comments on the CEC's Draft Appliance Rebate Program Guidelines**

*Additional submitted attachment is included below.*



July 24, 2015

Submitted via email to [doCKET@energy.ca.gov](mailto:doCKET@energy.ca.gov)

Dockets Unit  
California Energy Commission  
1516 Ninth Street, MS 4  
Sacramento, CA 95814

**RE: NRDC Comments on the Draft *Appliance Rebate Program Guidelines*  
Docket No. 15-WATER-03**

Dear Commissioners:

Thank you for the opportunity to submit comments on the Draft *Appliance Rebate Program Guidelines* (“Draft Guidelines”). These comments are submitted by the Natural Resources Defense Council (NRDC), which works on behalf of our 2.4 million members and activists, more than 380,000 of whom are Californians, to ensure safe and sufficient water for people and the environment.

We commend the Energy Commission for taking steps to encourage households to replace their inefficient clothes washers with new ENERGY STAR models and reduce water use amid the drought crisis. These water savings will help California’s households achieve the mandatory water use reductions established by Executive Order B-29-15.

We offer the following comments on how the Draft Guidelines can be improved to maximize the water and energy savings achievable with this program.

**1. Only households replacing an existing top-loading clothes washer should be eligible for rebates.**

The Draft Guidelines were developed in response to Directive 4 in Executive Order B-29-15, which states that the Energy Commission “shall implement a time-limited statewide appliance rebate program to provide monetary incentives for the *replacement* [emphasis added] of inefficient household devices.” Consequently, the Energy Commission’s rebate program should not be using public funds to subsidize the purchase of clothes washers for new homes or for households that do not currently have a clothes washer. These customers already are eligible for many existing rebate programs offered by energy and water utilities throughout California, which incentivize the purchase of ENERGY STAR (or even more efficient) clothes washers over models that only meet minimum federal efficiency requirements. The

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Appliance Rebate Program should not merely replicate these existing rebate programs. Instead, it should focus on the *replacement* of inefficient clothes washers as clearly directed by the executive order.

Eligibility for the rebate program should further be restricted to households replacing a top-loading clothes washer (generally the least efficient clothes washer type). In fact, more than 4 million homes in California still rely on legacy design top-loading clothes washers with center agitators, which use more than 40 gallons of water per load whereas today's ENERGY STAR models use less than 14 gallons—a savings of more than 8,000 gallons of water per year. Today's most efficient machines also save more than 750 kWh of energy each year over these older models, saving customers money on their utility bills while also reducing greenhouse gas emissions. A rebate program that is structured to incentivize the replacement of only the least efficient models offers the greatest water savings and is the most prudent use of the limited funding available for this program.

Accordingly, Section 6a of the Draft Guidelines,<sup>1</sup> which establish criteria for a “Qualifying Purchaser,” should include a criterion that a household must be replacing an existing top-loading clothes washer in order to be eligible to receive a rebate through the program.

## **2. The Energy Commission must require proof of proper recycling.**

It is critical that the Energy Commission ensure that old, inefficient units are destroyed when replaced as these units oftentimes are given away or resold and remain in use. While we fully support the requirement in the Draft Guidelines that old appliances being replaced be properly recycled,<sup>2</sup> we strongly urge the Energy Commission to require online and mail-in rebate applicants to submit documentation verifying that their old appliances were recycled responsibly by a Certified Appliance Recycler (CAR) and thereby permanently removed from service. This was a requirement under the state's previous Cash for Appliances program, which used federal funding from the 2009 American Recovery and Reinvestment Act to incentivize purchases of more energy efficient appliances and equipment, including ENERGY STAR clothes washers. This program required applicants to submit documentation showing that their previous appliance was recycled by a CAR as part of their rebate application. The Energy Commission should also ensure that customers receiving instant rebates at participating retailers are properly recycling their old clothes washers. For example, participating retailers could be required to collect and properly recycle old appliances from customer households that have received instant rebates.

## **3. The Energy Commission should use the program to collect data to support longer-term clothes washer recycling programs.**

NRDC has been actively engaging with energy and water utilities to offer a clothes washer recycling program. Our proposed method to account for the water and energy savings from such a program has been approved by the California Technical Forum. However, the lack of data on the used clothes washer market has been a barrier to ready implementation of a recycling program. The Appliance Rebate Program can help to address these data gaps. Requiring customers that are replacing an old top-loading clothes washer with a new model to list information about their previous appliance (e.g., brand, model

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<sup>1</sup> Draft Guidelines at p.5.

<sup>2</sup> Draft Guidelines at p.7.

number, and serial number) in the rebate application can help to generate data that will support the establishment of longer-term clothes washer recycling programs offered by investor-owned and public utilities. Data on appliances being replaced also will help the Energy Commission to more accurately calculate estimates of the amount of water and energy saved by the Appliance Rebate Program.

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Thank you again for the opportunity to provide comments on this important program. Additionally, we support the Energy Commission's plan to offer a Direct Install Program so that disadvantaged and low-income households can also benefit from water and energy savings. We look forward to reviewing the guidelines for that program and continuing to work with the Energy Commission to save water during the current drought as well as to better prepare California's communities for future drought events. If you should have any questions or would like to discuss our comments further, please do not hesitate to contact me at (310) 434-2300 or by email at [bchou@nrdc.org](mailto:bchou@nrdc.org).

Sincerely,



Ben Chou  
Policy Analyst, Water Program

cc: Christine Collopy, CEC  
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