

DOCKETED

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Comment Received From: Steve McCarthy
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CRA Comments - Landscape Irrigation Controllers

Additional submitted attachment is included below.



January 24, 2020

Commissioner Andrew McCallister
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Proposed regulations for landscape irrigation controllers (17-AAER-10)

Dear Commissioner McCallister:

The California Retailers Association (CRA) appreciates the opportunity to submit comments regarding proposed regulations for landscape irrigation controllers pursuant to Assembly Bill 1928 (Campos/2016).

CRA 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 over three million Californians – nearly one-fifth of California's total employment.

CRA requests that the Energy Commission remove any requirement for smart irrigation controllers connected to local weather forecasts and data to additionally interface with a rainfall sensor.

Newer connected smart digital irrigation controllers now offer superior watering savings to conventional clock-based timers by using local forecasting to dictate water demand. They are designed to adapt users' watering schedule accordingly. By continuously applying current data from local forecasts to prediction models, the digital systems more accurately gauge water needs versus timers with physical rain sensors they seek to replace. Over time, physical rainfall detectors fail because of debris accumulation and damage from exposure to the elements. Connected smart digital irrigation controllers use a variety of metrics to predict rainfall and watering needs more accurately.

The CEC's proposed requirement for landscape irrigation systems to interface with rainfall sensors present an unnecessary increased cost burden to manufacturers, retailers, and ultimately consumers who will purchase the technology. As the industry is already moving toward connected smart digital irrigation systems, we respectfully request that the CEC remove any requirement for irrigation controllers to also interface with a rainfall sensor.

Sincerely,

Steve McCarthy
Vice President, Public Policy and Regulatory Affairs
California Retailers Association