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| Docket Number: | 22-AAER-05 |
| Project Title: | Appliance Efficiency Regulations for Water Closets |
| TN #: | 249415 |
| Document Title: | IEUA Comments on Appliance Efficiency Regulations for Water Closets |
| Description: | N/A |
| Filer: | System |
| Organization: | Inland Empire Utilities Agency (IEUA) |
| Submitter Role: | Public Agency |
| Submission Date: | 3/23/2023 2:59:44 PM |
| Docketed Date: | 3/23/2023 |

*Comment Received From: Cathleen Pieroni
Submitted On: 3/23/2023
Docket Number: 22-AAER-05*

IEUA Comments on Appliance Efficiency Regulations for Water Closets

Additional submitted attachment is included below.



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March 23, 2023

California Energy Commission
Docket Unit
715 P Street
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Via <https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=22-AAER-05>

Re: Comments on Docket #: 22-AAER-05, Appliance Efficiency Regulations for Water Closets

To Whom it May Concern,

The Inland Empire Utilities Agency (IEUA/Agency) has long been a supporter of California's efforts to promote water and energy efficiency opportunities. In fact, IEUA is referenced in Chapter 5 (page 20) of the California Energy Commission's (CEC) 2015 Staff Analysis of Water Efficiency Standards for Toilets, Urinals, and Faucets as being supportive of the proposed standard at the time of 1.28 gallons per flush.

We write at this time to request that the CEC please connect with the California Association of Sanitation Agencies (CASA) as part of its rulemaking processes related to additional water efficiency regulations for fixtures and appliances in properties connected to municipal wastewater and recycled water systems. New industry analysis is underway suggesting that the cumulative impacts of declining flows on wastewater systems is mounting. Please consider:

California State Water Resources Control Board (State Board) Rulemaking Analysis – As the State Board undergoes the rulemaking process for implementation of *Making Conservation a California Way of Life*, as established in 2018 legislation (SB 606/AB 1668), draft staff analysis known as "Task 5"¹ qualitatively describes compounding impacts that additional declining flows may have on wastewater systems. Section 1.4.7. describes anticipated effects on water reuse. Also, at yesterday's State Board workshop on this subject, State Board staff reported that the impacts of declining flows are estimated to be approximately \$2.5 billion.

Governor's Signing Message on SB 1157 – Governor Newsom encouraged the State Board to develop a variance in the above mentioned rulemaking process to "reflect investments in recycled water and infrastructure" ([GSS 9121 1-20220928154917 \(ca.gov\)](https://www.gss.ca.gov/gss-9121-1-20220928154917-ca.gov))

¹ Evaluating effects of urban water use efficiency standards (AB 1668- SB 606) on urban retail water suppliers, wastewater management agencies, and urban landscapes (trees and urban parklands). January 2022.
www.waterboards.ca.gov/water_issues/programs/conservation_portal/regs/docs/task5-wastewater-excerpt.pdf.

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IEUA recognizes the importance of finding additional water conservation opportunities in common fixtures and appliances and applauds the CEC's rigorous scientific analysis on the capacity of the appliances to achieve greater reductions in water use. Much has changed, however, since the CEC's 2015 study on environmental impacts. Since 2009, per capita water use in IEUA's service area has been reduced by 38 percent – that is typical of statewide water use trends. The impacts of declining flows are generally still manageable today, albeit increasingly challenging to do so. However, as per capita indoor water use continues to decline, we believe it is important to recognize the level to which wastewater systems and recycled water production is negatively impacted and for the CEC's analysis to be in sync with that of the State Board².

Given that the science informing these policy considerations is evolving as flows continue to decline, we highly recommend that CASA be included in the CEC's study team for informing updated analysis so that the impacts that continued water use efficiency on municipal wastewater systems is clearly understood.

Sincerely,
INLAND EMPIRE UTILITIES AGENCY



Shivaji Deshmukh, P.E.
General Manager

cc: Jared Voskul, Manager of Regulatory Affairs, California Association of Sanitation Agencies

² Chapter 9 of the CEC's 2015 Appliance Efficiency Rulemaking documentation, entitled *STAFF ANALYSIS OF WATER EFFICIENCY STANDARDS FOR TOILETS, URINALS, AND FAUCETS*, states that "only antiquated combined sewer systems" may be affected by reduced flows while the State Board's 2023 analysis indicates much broader impacts.