

**DOCKETED**

<b>Docket Number:</b>	22-AAER-05
<b>Project Title:</b>	Appliance Efficiency Regulations for Water Closets
<b>TN #:</b>	250009
<b>Document Title:</b>	CEC Response Letter to IEUA
<b>Description:</b>	Response letter to Inland Empire Utilities Agency's (IEUA) request to connect with California Association of Sanitation Agencies (CASA). Sent via e-mail on May 1, 2023.
<b>Filer:</b>	Jessica Lopez
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	5/4/2023 4:45:22 PM
<b>Docketed Date:</b>	5/4/2023



April 25, 2023

Shivaji Deshmukh  
Inland Empire Utilities Agency  
A Municipal Water District  
6075 Kimball Avenue  
Chino, CA 91708  
***Via [sdeshmukh@ieua.org](mailto:sdeshmukh@ieua.org)***  
***cc [jvoskuhl@casaweb.org](mailto:jvoskuhl@casaweb.org)***

**RE: IEUA Comments on Appliance Efficiency Regulations for Water Closets**

To Shivaji Deshmukh,

The California Energy Commission (CEC) is the primary energy policy and planning agency for the State of California. The State of California has a compelling need for stringent energy conservation standards due to its policy goals of advancing energy and water efficiency, building decarbonization, and reducing greenhouse gas emissions. The CEC works to reduce the wasteful, uneconomic, inefficient, and unnecessary consumption of energy and water through several initiatives and policies, including appliance efficiency standards. Our goals include saving California ratepayers billions of dollars in reduced energy and water costs, avoiding millions of tons of greenhouse gas and other pollutant emissions, and ensuring energy reliability and security. The CEC recognizes the importance of working closely with state and local agencies to promote water efficiency of appliances in homes and businesses.

At the height of the 2012 to 2016 drought, the CEC updated its California appliance plumbing standards. The maximum water usage standards for toilets, faucets, urinals,<sup>1</sup> and showerheads<sup>2</sup> were lowered. In 2019, the CEC adopted standards for spray sprinkler bodies requiring them to have a pressure regulator, addressing the

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<sup>1</sup> 2015 Appliance Efficiency Rulemaking for Toilets, Urinals, and Faucets, Docket Number 15-AAER-04, <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=15-AAER-04>

<sup>2</sup> 2015 Appliance Efficiency Rulemaking for Residential Lavatory Faucets and Showerheads, Docket Number 15-AAER-05, <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=15-AAER-05>

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issue of excessive water pressure, resulting in excessive flow rate.<sup>3</sup> Combined, these standards are estimated to save 277 billion gallons per year of water at full stock turnover.<sup>4</sup> Continuing to build on the standards set in previous years, the CEC is considering establishing water efficiency regulations for irrigation controllers<sup>5</sup> and dipper wells,<sup>6</sup> in addition to water closets.

The CEC is committed to helping ensure water conservation remains a California way of life by taking all necessary actions to prepare and respond to drought conditions and welcomes the support from the Inland Empire Utilities Agency (IEUA) and the California Association of Sanitation Agencies (CASA).

The CEC looks forward to working with IEUA and CASA on water closets to help establish standards that are feasible and reduce total costs to consumers over the designed life of the appliance. Please forward your team contacts to Jessica Lopez at (916) 903-4165 or at [jessica.lopez@energy.ca.gov](mailto:jessica.lopez@energy.ca.gov), to begin collaborating.

Sincerely,



Peter Strait  
Appliance Branch Manager  
California Energy Commission

cc: Josephine Crosby, Attorney, Office of the Chief Counsel, CEC

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<sup>3</sup> 2019 Appliance Efficiency Rulemaking for Spray Sprinkler Bodies, Docket Number 19-AAER-01, <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=19-AAER-01>.

<sup>4</sup> Ibid., Dockets 15-AAER-04, 15-AAER-05, 19-AAER-01

<sup>5</sup> 2017 Appliance Efficiency Rulemaking for Irrigation Controllers, Docket Number 17-AAER-10, <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=17-AAER-10>

<sup>6</sup> 2021 Appliance Efficiency Rulemaking for Dipper Wells, Docket Number 21-AAER-01, <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=21-AAER-01>