

DOCKETED	
Docket Number:	17-AAER-10
Project Title:	Irrigation Controllers
TN #:	253642
Document Title:	Bryce Carnehl Comments - Request for Extension
Description:	Request for Extension of Comment Period for Proposed Appliance Efficiency Standards for Landscape Irrigation Controllers
Filer:	System
Organization:	Bryce Carnehl
Submitter Role:	Public
Submission Date:	12/18/2023 10:15:27 AM
Docketed Date:	12/18/2023

*Comment Received From: Bryce Carnehl
Submitted On: 12/18/2023
Docket Number: 17-AAER-10*

Request for Extension

Our formal request for extension may be found in the attached document. Thank you for your consideration.

Best,
Bryce Carnehl

Additional submitted attachment is included below.



CALIFORNIA ENERGY COMMISSION PROPOSED APPLIANCE EFFICIENCY STANDARDS FOR LANDSCAPE IRRIGATION CONTROLLERS

DECEMBER 15TH, 2023

**ATTN: SOHEILA PASHA
SENIOR ELECTRICAL ENGINEER
CALIFORNIA ENERGY COMMISSION
DOCKET NUMBER 17-AAER-10**

**RE: REQUEST FOR EXTENSION OF COMMENT PERIOD FOR PROPOSED APPLIANCE
EFFICIENCY STANDARDS FOR LANDSCAPE IRRIGATION CONTROLLERS**

Soheila Pasha,

Hunter Industries respectfully requests the California Energy Commission to extend the public comment period to sixty (60) days beyond the originally scheduled deadline of January 8th, 2024, to allow time to properly identify questions and concerns within the November 8th, 2023, Staff Report – *Staff Analysis of Proposed Efficiency Standards for Landscape Irrigation Controllers*.

The California Energy Commission held a digital public staff workshop on December 11, 2023, in which an overview was provided for the proposal. It was shared that this proposal aligns with EPA Watersense certification with over 960 irrigation controllers currently available as Watersense certified as identified by the California Energy Commission. This proposal will require that only Watersense certified irrigation controllers be available for purchase for all non-agriculture landscape use.

Hunter Industries intends to provide the California Energy Commission with substantive and thorough comments on this complex topic and the lasting impact it will have on the California landscape industry, irrigation controller manufacturers, industry distributors, retail centers, e-commerce, and the general public. The EPA Watersense program is a well-established and exercised voluntary program

HUNTER INDUSTRIES, INC.

1940 Diamond Street | San Marcos, California 92078 | U.S.A

+1 760-744-5240 **Main** | +1 760-744-7461 **Fax** | www.hunterindustries.com | www.fxl.com



through which Hunter Industries offers over sixty (60) Watersense labeled solutions. However, this is the first time total component packaging and controller-reactive on-site sensor data will be required. Key personnel including but not limited to product managers, product engineers, customer service representatives, logistics engineers, sales and marketing will need to consider the proposals potential impact, not only to our existing sixty-plus (60+) Watersense labeled controllers, but to the other one-hundred plus (100+) controller model configurations currently available for purchase in California. Given the potential impact to landscape industry stakeholders, the short comment period, and that the comment period falls over major holidays and end-of-year events, Hunter Industries finds it difficult to provide adequate and complete comments to the California Energy Commission by January 8th, 2024. A reasonable extension will enable Hunter Industries to properly consider this proposal and appropriately respond to the California Energy Commission.

Hunter Industries requests that the California Energy Commission extend its comment deadline to sixty (60) days after the original deadline of January 8th, 2024.

Thank you for your review and consideration of Hunter Industries request for a sixty (60) day extension to this public comment period. Please contact me should you have any questions regarding this submission.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bryce Carnehl". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bryce Carnehl,
Specification Marketing Manager, Hunter Industries