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*Comment Received From: Rain Bird Corporation
Submitted On: 12/18/2023
Docket Number: 17-AAER-10*

Rain Bird Corporation Comment - Request for Extension

The attached document requests an extension of time for public comment. Thank you for your consideration.

Additional submitted attachment is included below.



December 18, 2023

Re: Docket # 17-AAER-10 (Irrigation Controllers) – Comment Period Extension Request

To Whom It May Concern,

The Rain Bird Corporation requests that California Energy Commission extend the public comment period by 60 days with a new deadline of March 8, 2024. The first workshop on the proposed regulation was held on December 11 and the proposed regulations were published on November 8. The timing of the proposed regulations publication was right before a holiday and a major industry event reducing our time to fully understand the intricacies of the regulations. The workshop helped clear up points of confusion but now the public comment time is impacted by two more holidays and another industry regulation related to sprinkler nozzles that has the same public comment period. The holidays and splitting of resources across two potential regulations reduces time to review and provide helpful comments. The teams at Rain Bird need time to accurately quantify the impact to end users, our company, and the industry as a whole.

With an extension the Rain Bird Corporation would do the following:

1. Conduct research on understanding consumer behaviors that could improve the effectiveness of achieving the desired water savings.
2. Research the water savings that could be achieved through updating existing installed controllers to EPA WaterSense certification.
3. Better understand how the proposed regulation would impact irrigation industry supply chains.
4. Understand the technical aspects of developing or modifying products that are not in compliance with the proposed regulation.

We look forward to working with you and other industry partners to help reduce water waste.

Sincerely,

Handwritten signatures of Sean Azad and James Harris in black ink.

Sean Azad, Marketing Manager for Landscape Controls
James Harris, Marketing Manager for Consumer Products