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Comment Received From: Rain Bird Corporation
Submitted On: 2/6/2024
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Rain Bird Corporation Comments

Additional submitted attachment is included below.

February 6th, 2024

Re: Docket # 17-AAER-10 (Irrigation Controllers) - Rain Bird Comments

To Whom It May Concern,

The Rain Bird Corporation has reviewed the California Energy Commission (CEC) Staff Report - Staff Analysis of Proposed Efficiency Standards for Landscape Irrigation Controllers, and requests that the California Energy Commission consider the following comments from the standpoint of manufacturing irrigation controllers.

Rain Bird supports the use of EPA WaterSense certified controllers for greater watering efficiency, but the EPA WaterSense certification is a voluntary program today, and if it changes to a requirement there are topics that need to be considered.

Topic: Chapter 2: Background, U.S. EPA WaterSense Plug-In and Add-On Controllers

Many EPA WaterSense certified controllers received that certification using a combination of products. Continuing to allow the sale of separate EPA WaterSense certified irrigation controller components enables flexibility and efficiency and ensures consumers will have more options to achieve California's water saving goals. Some products can combine to make more than one controller EPA WaterSense certified. For example, one rain sensor or weather data hub could be used with multiple controllers. Mandating all irrigation controllers be packaged and sold with all accessories required for EPA WaterSense certification will introduce packaging and electronic waste. Some accessories will be discarded if they are required to be bundled in the same packaging with every irrigation controller. Additionally, such a mandate would require California-specific stock keeping units, which will result in oversized packaging waste, duplication of inventory for distributors, a reduction in options and an increase in costs to consumers.

Topic: Chapter 4: Test Procedures

The CEC staff report suggests that all weather-based landscape irrigation controllers within the scope and time of the standard "be certified as tested in a lab approved by the CEC". It is recommended that existing EPA WaterSense certified controllers not be required to recertify if they were originally tested at a lab that is not on a new CEC-approved lab list. Such a requirement would add unnecessary delay to implementation (WaterSense controller testing takes months to complete for each model submitted) due to testing capacity constraints and decrease choices for consumers. We request that

existing EPA WaterSense certified controllers are accepted into the CEC Efficiency Standards for Landscape Irrigation Controllers, and the Efficiency Standards adopt the EPA WaterSense testing as the standard. It should also be considered that there is currently only one approved EPA WaterSense testing lab, and that lab should be included in the approved list of testing labs.

Topic: Chapter 4: Scope

It is recommended that battery-operated irrigation controllers should be excluded from the scope of Efficiency Standards for Landscape Irrigation Controllers due to the following considerations:

1. EPA WaterSense certified battery-operated controllers are not commonly sold today due to the difficulty in transmitting regular weather data to them in an energy efficient manner. EPA WaterSense certified controllers receive irrigation and weather updates through the internet or have an onsite measuring device to adjust irrigation. Battery-operated controllers available on the market today either have a passive input device for rain/soil sensors or use a low power radio frequency to talk to a hub that is usually connected to the internet. Connecting a real-time weather measuring device would cause rapid battery drain. Since battery-operated controllers are often used in nurseries, commercial and construction sites, agricultural applications, and gardens without easy access to 120v power, it is not practical to expect these controllers to be in range of a Wi-Fi signal. The inclusion of battery-operated controllers in the proposed standards is not practical for many real-world applications of these products, nor is the technology available today to meet the proposed standard.
2. While evaluating possible future solutions for EPA WaterSense certified battery-operated controllers, potential negative consequences should be considered, such as increased cost, decreased battery life, and the proliferation of battery waste streams. Since the devices would grow in complexity and power consumption, the battery life would drop from the current standard of two years battery to a matter of months. Additionally, battery-operated controller costs to consumers would rise, making consumers consider alternative watering options, including manual watering, which is far less efficient than automated options. Meanwhile, the non-residential applications for battery-operated controllers would be greatly harmed by the removal of current options. This technology is evolving but requiring a solution that is not currently available will likely remove access to battery-operated controllers from the market in the short term.

If the CEC includes battery-operated controllers in the Efficiency Standards for Landscape Irrigation Controllers, there should be a significantly longer time period until the regulation is implemented. Additional time would allow the industry to incorporate better technologies and more cost-effective solutions that will provide the required weather data to meet EPA WaterSense requirements. It is suggested the earliest implementation for battery-operated controllers should be January of 2028.

It is also recommended that hose-bib controllers are excluded from the scope of Efficiency Standards for Landscape Irrigation Controllers for similar reasons as battery-operated controllers. Although hose-bib controllers are more feasible than battery-operated controllers due to proximity to residential structures with Wi-Fi, and there are products available in the market, there are still common applications for hose-bib controllers away from residential properties including community gardens and nurseries. If hose-bib controllers were included in the scope of the standards it would force consumers to resort to manual watering or using manual watering timers, which could increase time and labor costs.

The last topic to consider for the proposed efficiency standards is the implementation timing. The proposed implementation time of summer of 2025 does not take into consideration the seasonality of irrigation products and the way the retail and distribution partners manage inventory. It is recommended that any regulation passed will start in January because that is when retailers and distributors begin changing inventory for the upcoming season. Making a change in the middle of the calendar year would require additional store labor that is an unnecessary burden, and it makes it difficult to plan inventory management, likely resulting in distribution locations where consumers cannot find newly regulated products.

Thank you for reviewing these comments and we look forward to working with you and other industry partners to continue to help reduce water waste.

Sincerely,

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