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EPA WaterSense Comments on CEC PRL for Irrigation Controllers

Please see attached comment letter.

Additional submitted attachment is included below.

EPA WaterSense

A partnership program of the
U.S. Environmental Protection Agency

February 7, 2024

California Energy Commission
Docket Office, MS-4
715 P Street
Sacramento, CA 95814

RE: Docket #17-AAER-10 – Irrigation Controllers

Dear California Energy Commission,

The U.S. Environmental Protection Agency's (EPA's) WaterSense® program thanks the California Energy Commission (CEC) for the opportunity to participate in the appliance efficiency rulemaking process. WaterSense is a voluntary partnership program that labels water-efficient products and services and promotes efficient water use throughout the United States. The WaterSense label is intended to easily identify products and services that use 20 percent less water, save energy, and perform as well as or better than standard models on the market. To date, EPA has developed WaterSense specifications for eight plumbing and irrigation product categories, including tank-type toilets, flushometer-valve toilets, urinals, showerheads, lavatory faucets and faucet accessories, weather-based irrigation controllers, soil moisture-based irrigation controllers, and spray sprinkler bodies, and has developed additional specifications for homes and irrigation professional certification programs.

EPA's goal in submitting comments to CEC is to support harmonization with the WaterSense specifications and provide it with information related to irrigation controllers that we have collected in our specification development efforts. During the specification development process, EPA engages various stakeholders and partners, including water and energy utilities, manufacturers, industry professionals, and the general public. Wherever feasible, WaterSense specifications reference existing, consensus-based national standards as the basis for the water efficiency and performance testing protocols. In cases where a consensus-based standard does not exist or is deficient in meeting WaterSense's criteria for specification adoption, EPA works with standards organizations and industry stakeholders to develop repeatable test methods that provide reproducible results.

EPA supports the proposed regulatory language to amend the Appliance Efficiency Regulations (California Code of Regulations, Title 20, Sections 1601 through 1609) to require landscape irrigation controllers sold in California to be tested according to, and meet the criteria within, either the *WaterSense Specification for Weather-Based Irrigation Controllers*, Version 1.1 or the *WaterSense Specification for Soil Moisture-Based Irrigation Controllers*. The harmonization between CEC and EPA's WaterSense program with respect to the test method and performance

criteria will provide utilities and consumers with clear and consistent information, as product efficiency and performance will be easily comparable across states. Additionally, harmonization with respect to test methods will ease the compliance cost and burden on manufacturers because they will be able to have products tested a single time to demonstrate compliance with both the CEC regulation and the voluntary WaterSense specification(s).

While EPA supports the proposed regulatory language, we recommend that CEC clarify that by-pass soil moisture-based irrigation controllers are included in the scope of the regulation and on-demand soil moisture-based irrigation controllers are excluded, to align with Section 1.0 of the *WaterSense Specification for Soil Moisture-Based Irrigation Controllers*. As written, the proposed regulatory language is unclear as to which types of soil moisture-based irrigation control technologies are included in the scope of the regulation. While EPA would like to include on-demand technologies in the WaterSense program, there is currently no test method, published water savings studies, nor performance criteria for these products. If this information becomes available in the future, EPA may consider including these technologies within an existing or future WaterSense specification.

EPA would also like to respond to a question that was raised during the workshop CEC held on December 12, 2023. A participant asked if a weather-based irrigation controller can operate based solely on historical evapotranspiration (ET). According to Section 1 of the *WaterSense Specification for Weather-Based Irrigation Controllers* and CEC's draft proposed regulatory language, a weather-based irrigation controller cannot operate solely based on historical ET. Historical ET shall be modified by an onsite weather sensor, such as temperature or solar radiation. Because rainfall devices and soil moisture sensors do not modify ETc but interrupt or modify previously scheduled irrigation events based on rainfall or soil moisture readings, they do not meet this onsite weather sensor requirement (under the W*aterSense Specification for Weather-Based Irrigation Controllers*) when used as the sole method for modifying irrigation schedules.

EPA is available and willing to discuss its specifications for weather-based and soil moisture-based irrigation controllers. Please contact Stephanie Tanner (tanner.stephanie@epa.gov) if necessary. Thank you again for the opportunity to comment.

Sincerely,

EPA WaterSense
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