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Docket Number:	17-AAER-08
Project Title:	Sprinkler Spray Bodies
TN #:	223113
Document Title:	NRDC Comments on CEC Staff Analysis of Proposed Appliance Efficiency Regulations for Spray Sprinkler Bodies
Description:	N/A
Filer:	Patty Paul
Organization:	Natural Resources Defense Council
Submitter Role:	Public
Submission Date:	4/3/2018 8:45:24 AM
Docketed Date:	4/2/2018

Comments of the Natural Resources Defense Council

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Re: CEC Staff Analysis of Proposed Appliance Efficiency Regulations for Spray Sprinkler Bodies

Docket No. 17-AAER-08

April 2, 2018

This statement supplements NRDC's comments at the March 14, 2018 staff workshop on this topic, which are incorporated here by reference.

1. NRDC supports the adoption of state efficiency standards for spray sprinkler bodies (SSBs).
 - State policy calls for making water conservation “a California way of life,” with water efficiency a priority consideration regardless of water availability in any given year.
 - The estimated water savings at full stock turnover (10 years) in the staff analysis of 83,526 million gallons per year, or 256,000 acre-feet per year, is more than one and a half times greater than the entire annual water use of San Diego, the state's second largest city.
2. NRDC supports the reporting requirement proposed for Sec. 1604 (y)(1)(B) for “Test B” with an initial calibration flow rate equal to 0.75 +/- 0.1 gallons per minute. However, we do not believe that it is necessary for the test results to be identifiable by product in the Commission database. We recommend that this testing and reporting requirement be retained, but that results may be limited to disclosure in aggregated form.
3. Definitions –

“Maximum operating pressure” differs from the manufacturer's *recommended* operating pressure. The word “recommended” here should be replaced with “specified” or something similar. Also, the pressure is specifically an inlet pressure.
4. It is unclear what purpose is served by the cross references to the SSB standard in proposed additions to Sections 1605.1 and 1605.2 of current Title 20 regulations, as these sections pertain to state standards for Federally regulated products. There is no federal standard for SSBs, and none is likely to be adopted for the foreseeable future.
5. We recommend the inclusion of the anti-burst standard present in both ASABE/ICC 802 and WaterSense, as well as California's Model Water Efficient Landscape Ordinance. Because compliance with the industry standard and the WaterSense specification require this feature, the cost of its inclusion here should be *de minimis*.