

**DOCKETED**

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**Remarks submitted under Section 14 – Public Comment. RE: The pressure regulating sprinkler mandate effective October 1<sup>st</sup>.**

My name is Ted Sirkin. I am a CA-licensed landscape & irrigation contractor since 1963. My company's name is Valvette Systems. Born and bred here in California, we manufacture the world's ONLY water conservation sprinklers. Our sprinklers are the ONLY sprinklers on the Rebate list of the nation's largest treated water facility – the Metropolitan Water District of So Cal. The MWD named our sprinklers and sprinkler parts as In-stem Flow regulating sprinklers.

We appealed to the CEC 2 months ago to consider allowing us a one-year, provisional approval of our sprinklers so that we could arrange for testing that would parallel the end goals of the CEC's October 1<sup>st</sup> sprinkler head pressure-regulation mandate. The provisional approval actually only needs about 6 months because the intended testing will take place at a California state organization – the C.I.T. – the Center for irrigation Technology, which is located at a California university – Cal-State, Fresno. The CIT is the Underwriter's Laboratory for irrigation products throughout the entire North American continent.

The new CEC standard came about because of the huge water loss through sprinklers when operating under high pressure circumstances, which is common throughout many areas of California. The present and approved method of sprinkler head pressure regulation is performed by way of an insertion of a spring-loaded device into the middle of the pop-up riser stem of a sprinkler. This technology was developed in the 20<sup>th</sup>-Century in the late 1980s and early 1990s.

The IFR technology was invented and developed in the 21<sup>st</sup>-Century resulting in a huge improvement over the 20<sup>th</sup>-Century technology. In our appeal, we provided access to 19 different testing results that clearly show the tremendous water savings achievable with In-stem Flow Regulation., which I will refer to as IFRs. The appeal was accompanied with photos that clearly show the awesome reduction of inlet pressure of 90 - 100 psi in contrast to the outlet pressure, which can be as low as 5 p.s.i. depending on distance.

The existing 20<sup>th</sup>-Century technology does just ONE thing to save water: It controls high pressure up to 70 p.s.i - by one manufacturer, up to 100 psi by another. If the inlet pressure exceeds the manufacturer's maximum, the device does not function properly. The approved device also creates an obstructed water passageway through the sprinkler stem, which means if and when debris and/or stones get caught up within the device, the device is rendered useless and the entire sprinkler is subject to being replaced.

The IFR, on the other hand, saves water in several ways AND allows for an UNobstructed water passageway upon demand by the maintenance personnel. A major contribution to water

conservation provided by IFRs is the elimination of overspray, which is the number one cause of runoff. Please note that runoff has been declared illegal within California because it is the epitome of water wasting. The present method makes no contribution to conservation in this regard. The IFR allows the operator to dial in the precise distance of throw from the sprinkler, thereby eliminating overspraying. Additionally, the presence of the IFR also allows for higher uniformity of the water application, which also contributes to water savings.

The negative response from the Appliances Office was 100% bureaucratic and unnecessarily restrictive. As inferred above, the IFR utilizes a more up-to-date method of eliminating the water-wasting misting/fogging. Therefore, the method to test the IFR could not be the same method as testing the existing technology. The CEC's sole reliance on the EPA's WaterSense testing on 20<sup>th</sup>-Century devices undertaken at the University of Florida several years ago clearly does NOT serve the California Energy Commission's goals of conserving water. Rather, the Office's response blocks further consideration of attaining a lot more water conservation that is now available in this century, but was not available in the 20<sup>th</sup> Century.

As a forever denizen of California since birth, I cannot fathom the roadblocking conclusion of the negative response of the Appliances Office's that this State agency – the CEC, has no feasible method of going around or complementing Title 20 – either within or without Title 20, when the drastic need for saving every drop of water is so strong and so necessary in the State of California. If water conservation is as important as everybody - including state officials, say it is, then someone within the CEC should be able to figure out some way to provide a doorway to bring on an additional, more efficient method to meet the goals of the CEC to simply reduce water loss created by high pressure sprinkler systems.

Thank you for allowing us to submit tis comment.

Ted Sirkin  
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