

DOCKETED	
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Submitted On: 12/14/2023
Docket Number: 17-AAER-10

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

Additional submitted attachment is included below.

December 14, 2023

Mr. Michael J. Sokol
California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

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

To whom it may concern:

On behalf of the approximately 1,300 member companies of the Irrigation Association, I respectfully request a **60-day extension** of the Commission's *Pre-Rulemaking Comment Period for Landscape Irrigation Controllers Proposed Standards*.

The Irrigation Association represents experts in all aspects of irrigation, including agriculture, landscape, turfgrass and golf. As stewards of water resources, irrigation professionals and companies recognize the important role we serve in ensuring water resources are accessible for future generations. Our industry and our members are committed to investing in new product development and contributing expertise to encourage dialogue and successful solutions that have a lasting impact on the sustainability of our water resources.

We appreciate the opportunity to review and comment on both the draft proposed regulations and the draft staff analysis report on behalf of the entire irrigation industry. To ensure the full breadth of impacts are considered, we respectfully request additional time to gather input and provide feedback on the proposal. Additional time would allow the opportunity for more robust and comprehensive feedback to the program, particularly in light of insights provided during the Commission's Dec. 11 webinar.

Given the fact that significant holidays are observed in between the webinar and the comment period deadline, the current schedule makes it difficult to adequately address the various elements of the proposal. In addition, the IA and our member companies are also currently reviewing and developing responses to two other regulatory matters impactful to the industry that have comment period deadlines close to this deadline. Specifically, comments to the EPA WaterSense program on a draft specification for spray sprinkler nozzles are due Jan. 12, 2024, and comments to the California Department of Water Resources on proposed revisions to the Model Water Efficient Landscape Ordinance are due Jan. 16,

2024. As all three proposals impact the irrigation industry and many of the same companies are evaluating and responding to the proposals simultaneously, this timeline will not allow sufficient time to develop meaningfully constructive comments.

Thank you for your consideration of this request. Please contact Nathan Bowen (nathanbowen@irrigation.org), Irrigation Association advocacy and public affairs vice president, for additional information.

Sincerely,

A handwritten signature in black ink that reads "Natasha L. Rankin". The signature is written in a cursive, flowing style with a large initial 'N' and a decorative flourish at the end.

Natasha L Rankin, MBA, CAE
Chief Executive Officer