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Orbit Irrigation Comments

Additional submitted attachment is included below.



February 7, 2024

Re: Docket # 17-AAER-10 (Irrigation Controllers) – Proposed Efficiency Standards for Landscape Irrigation Controllers – Orbit Irrigation Comments

To whom it may concern,

Orbit Irrigation Products has reviewed the California Energy Commission's Staff Analysis of Proposed Efficiency Standards for Landscape Irrigation Controllers and is appreciative of the opportunity to provide feedback.

Orbit Irrigation is North America's premier company for residential watering. With a presence in over 180 countries and 6 continents, we offer the most complete ecosystem of solutions across hose faucet, hose, hose-end, underground, drip, mist, and yard protection. For over half a century, we have led the industry in innovative solutions, accumulating over 100 active patents and many industry recognition awards. From PVC-Lock®, Blu-Lock® and Drip-Lock®, which are an extraordinarily fast, environmentally friendly way to connect sprinkler pipe and drip tubing, to our technologically advanced, best-selling EPA WaterSense labeled B-hyve smart controllers, we have modernized the industry, set the standard for residential irrigation best practices, and made outdoor watering efficient for households around the world. Hydro-Rain is the cutting-edge commercial and agricultural counterpart of Orbit, featuring BUILT FOR SPEED® offerings that are engineered specifically for professional contractors and growers. Together, Orbit and Hydro-Rain form a business unit within Husqvarna Group's Gardena Division, collectively comprising the world's largest residential watering manufacturer. Because securing access to safe fresh water for communities is a global priority, we are proud to affirm our commitment to delivering a comprehensive ecosystem of smart solutions, covering applications FROM FAUCET TO FARM™, as we continuously pursue the vision of CHANGING THE WAY THE WORLD WATERS®.

We at Orbit support the U.S. EPA WaterSense certification program and the CEC's desires to promote water and energy conservation. With that in mind, Orbit Irrigation proposes the following considerations and changes to the Staff Analysis.

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

"...plug-in and add-on devices can provide a pathway for compliance of basic irrigation controllers with the proposed standards if sold together and the overall product meets the proposed standards when tested per the proposed test procedure."

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The U.S. EPA WaterSense certification for landscape irrigation controllers allows for controllers and “add-on devices” to be sold separately as long as the controller packaging has callouts that reference the WaterSense label ONLY when used with a qualifying add-on device. Some of those devices that qualify controllers to be WaterSense certified include Wi-Fi hubs and soil moisture sensors. The CEC proposals states that these devices must be sold together and seems to infer that they must be packaged together. Packaging and selling controllers and add-on devices together add a lot of unnecessary cost and may deter homeowners from purchasing the product and saving water. A Wi-Fi hub is necessary for hose-bib controllers to be WaterSense certified, but a consumer does NOT need to purchase a hub for every controller. A single Wi-Fi hub can function with multiple hose-bib controllers. Similarly, if a consumer already owns a compatible soil moisture sensor, they do not need to purchase a controller with a soil moisture sensor. Selling and packaging these products together as one, also, create additional packaging waste for the consumer, increased cost of shipping for the manufacturer and consumer, and additional skus for the CEC to manage.

Topic: Chapter 2: Background, Hose-Bib Controllers

Orbit Irrigation supports Hose-Bib Controllers being within scope of the CEC’s proposed efficiency standards for landscape irrigation controllers. As noted above, it is recommended to allow Wi-Fi hubs and their compatible hose-bib controllers to be sold and packaged both together as well as separately. Like a smart light bulb, multiple Wi-Fi hub compatible hose-bib controllers can function with a single Wi-Fi hub.

Topic: Chapter 4: Test Procedures

“...and be certified as tested in a lab approved by the CEC.”

For the ease of CEC management, money, and time, as well as the speed of implementation, Orbit recommends that the CEC accept, at minimum, all labs accepted and approved by the U.S. EPA WaterSense label. It should not be necessary, and would cause delay, to have any of today’s WaterSense labeled irrigation controllers and devices be recertified by a new or different lab to those accepted by the EPA. It is recommended, at minimum, that the CEC grandfather existing EPA WaterSense labeled products into its list of approved products.

Topic: Appendix B: Proposed Regulatory Procedures, 1602. Definitions, “Weather-Based Landscape Irrigation Controller”

“Weather-Based Landscape Irrigation Controller” means a landscape irrigation controller that is capable of creating or modifying irrigation schedules based on evapotranspiration (ET) principles by:

- 1. Storing historical crop evapotranspiration (ETc) data characteristics of the site and modifying these data with an onsite sensor;*
- 2. Using onsite weather sensors as a basis for calculating real-time ETc;*
- 3. Using a central weather station as a basis for ETc calculations and transmitting the data to individual users from remote sites; or*
- 4. Using onsite weather sensors.”*

It is recommended to use the accepted U.S. EPA WaterSense Label definition from ANSI:SABE S627 which states:

“...this type of controller could include one or more of the following:

Controllers that use onsite weather sensors to determine irrigation needs

Controllers that receive weather data from an off-site source

Control technology that is added to existing time-based controllers that interfaces with either the controller program or electrical output to zone valves

Controllers that utilize historical ETc data characteristic of the site, in conjunction with other inputs.” (ANSI/ASABE S627, 1.2)

It is important to emphasize the phrase, “include one or more of the following.”

Thank you for reviewing our comments and we trust they will be taken into consideration while refining this proposal for the benefit of the state of California, its citizens, and the landscape irrigation industry.

Sincerely,



Matt Stuart

Product Category Manager
Orbit Irrigation Products