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Dipper Wells RFI Comments

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE), collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), in response to the California Energy Commission September 24, 2024, request for information regarding standards for dipper wells.

Additional submitted attachment is included below.



December 10, 2024

Ms. Jessica Lopez
California Energy Commission
Docket Unit
715 P Street, Sacramento, CA 95814

Docket Number: 21-AAER-01

Dear Ms. Lopez:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE), collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), in response to the California Energy Commission September 24, 2024, request for information regarding standards for dipper wells.

The CA IOUs comprise some of the largest utility companies in the nation, serving over 32 million customers in the Western U.S. We are committed to helping customers reduce energy costs and consumption while striving to meet their evolving needs and expectations. Therefore, we advocate for standards that accurately reflect the climate and conditions of our respective service areas.

We respectfully submit the following comments to the California Energy Commission (CEC):

1. The CA IOUs support CEC in establishing a maximum flow rate for continuous dipper wells.

The CA IOUs applaud the CEC for its efforts within the workgroup to investigate strategies for reducing water usage in utensil cleaning. The CEC solicited information from workgroup members and local health departments to understand the various cleaning options for utensils used in food service applications. The CA IOUs collaborated with industry experts to determine an appropriate method for comparing the water and energy consumption of utensil cleaning solutions on the market. We agree that comparisons would be inadequate without a comprehensive understanding of the market and usage patterns. The most straightforward approach to reducing water consumption in the CEC rulemaking process is setting a maximum flow rate for continuously operating dipper wells.

The flow rate of 0.2 gallons per minute (GPM) at a supply pressure of 60 pounds per square inch (PSI) aligns with both the 2023 International Association of Plumbing and Mechanical Officials (IAPMO) Water Efficiency and Sanitation Standard (WE-STAND)¹ and 2024 IAPMO Uniform Plumbing Codes.² The CA

¹ "2023 Water Efficiency and Sanitation Standard for the Built Environment" (International Association of Plumbing and Mechanical Officials, July 2024), <https://epubs.iapmo.org/2023/WESTAND/>.

² "2024 Uniform Plumbing Code" (International Association of Plumbing and Mechanical Officials, February 2023), <https://epubs.iapmo.org/2024/UPC/>.

IOUs support CEC in selecting a flow rate that aligns with existing standards, developed using a consensus-based process with input from industry experts.

2. The CA IOUs support CEC in excluding a utensil cleanability test method to qualify continuous flow dipper wells.

We agree that insufficient data on utensil cleaner operation patterns make it difficult to effectively implement the CA IOUs' proposed test procedure for estimating the daily water and energy consumption of continuous and non-continuous flowing dipper wells. Therefore, based on the available information, the CA IOUs agree that establishing regulations specifically for continuous dipper wells would be an appropriate first step. We commend the CEC for publishing the CA IOU draft of the Dipper Well Test Method to compare the various dipper well types.³

The CEC's primary focus is establishing requirements for continuously flowing dipper wells. As noted above, the maximum flow rate selected aligns with existing standards. If the flow rate requirement for continuous flow dippers does not meet the cleanliness needs for specific applications, an operator may install a different type of dipper well or another utensil cleaning method.⁴

The CA IOUs appreciate the opportunity to provide these comments regarding the request for information on dipper wells. We thank the California Energy Commission for its consideration and look forward to the next steps in the process.

Sincerely,



Rob Bohn
Manager, Codes & Standards
Pacific Gas and Electric Company



Christopher Malotte
Sr. Manager, Codes and Standards
Southern California Edison



Kate Zeng
ETP/C&S/ZNE Manager
Customer Programs
San Diego Gas & Electric Company

³ The California Investor-Owned Utilities (CA IOUs), "CA IOUs Draft Dipper Well Test Method," *California Energy Commission*, September 24, 2024,

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=259266&DocumentContentId=95353>.

⁴ Options include maintaining the utensils below 41°F or above 135°F and regularly sanitizing them, based on responses from health officials in Sacramento County, the City of Berkeley, and Butte County, included in the RFI.