

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

September 29, 2011

DOCKET

11-AAER-1

DATE Sept 29 2011

RECD. Sept 29 2011

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 11-AAER-1
1516 Ninth Street
Sacramento, CA 95814-5512

Dear Commissioners:

Docket No. 11-AAER-1 2011 Rulemaking on Appliance Efficiency
Regulations Efficiency Performance Standards for Landscape Irrigation Control Equipment

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to provide comments to the California Energy Commission's Efficiency Committee on the 2011 scoping order. This scoping order will continue California's progress in advancing water and energy efficiency standards for appliances and equipment. Establishing efficiency standards for landscape irrigation control equipment will provide added benefit by helping the state achieve a 20 percent reduction in per capita water by 2020 as set forth in the Water Conservation Act of 2009 (Act) (SBx7-7, Steinberg). To meet these objectives, Metropolitan encourages the Committee to review and consider adopting the United States Environmental Protection Agency (US EPA) WaterSense® performance and labeling specifications for landscape irrigation equipment due out later this year.

Landscape irrigation is a significant component of urban water demand, and therefore a priority for water and energy efficiency. Approximately 50 percent of residential water use is used outdoors; this can exceed 70 percent in warmer inland areas. This issue was recognized in the 2006 Water Conservation in Landscaping Act (AB 1881, Laird). In addition to requiring the Department of Water Resources to update the state's model water efficient landscape ordinance, the Act called for the Energy Commission to adopt performance standards and labeling requirements for landscape irrigation equipment, including controllers, moisture sensors, emission devices, and valves (Public Resources Code Section 25401.9).

The Commission responded to this legislation by initiating proceedings for landscape irrigation equipment efficiency performance standards (Docket No. 09-AAER-1A). After reviewing studies and information provided through technical workshops, the Efficiency Committee determined that the information was inadequate and additional time and resources would be needed to conduct studies and complete the analyses. Due to financial constraints, the

California Energy Commission

Page 3

September 29, 2011

Committee suspended the proceedings. As a result, the state has not adopted efficiency performance standards for landscape irrigation devices that significantly affect urban water use. However, the US EPA, water agencies, the irrigation industry, and environmental groups have continued to move forward to establish performance standards for irrigation equipment that would meet US EPA WaterSense standards. Products that seek WaterSense certification and labeling are independently tested to ensure that they meet standards and perform at a level that is at least 20 percent more efficient than standard products. WaterSense performance standards and testing protocols are developed through a lengthy public process with significant stakeholder involvement. The US EPA process for weather-based irrigation controllers and moisture sensors is expected to be complete within the next year.

Metropolitan encourages the Committee to adopt the US EPA WaterSense efficiency performance standards for landscape irrigation control equipment to fulfill the intent of AB 1881. In the near term, this would include landscape irrigation controllers and soil moisture sensors. In the future, it could include emission devices and valves should US EPA WaterSense specifications be developed for these components of irrigation control. This approach offers several important benefits to the state:

- **Avoids increased costs for the state:** By adopting US EPA WaterSense performance standards, the Committee avoids the need to conduct further studies and perform analyses on irrigation equipment. This would avoid redundant efforts to develop and adopt standards that have already been adopted through the US EPA's public process that included considerable stakeholder involvement.
- **Supports state's energy efficiency goals:** The state's energy policies recognize the potential for energy efficiency through water conservation. Adopting US EPA WaterSense performance standards for landscape irrigation equipment supports the state's goals for energy efficiency.
- **Supports state's water efficiency goals:** Adopting US EPA WaterSense performance standards for landscape irrigation equipment achieves the intent of the 2006 Water Conservation in Landscaping Act to improve irrigation efficiency. In addition, it would provide significant improvements in outdoor water use to help the state achieve its goals for a 20 percent reduction in per capita water use by 2020. Improvements in outdoor irrigation efficiency are critical to the success of the state in meeting 2015 and 2020 per capita targets.
- **Industry developed standard:** The US EPA WaterSense performance standards and testing protocols are developed through a public process that encourages broad stakeholder involvement. The landscape industry has been integrally involved, providing technical expertise, research, and analyses. Adopting the WaterSense performance standards acknowledges the value of this participatory effort and the stakeholder-supported outcome.

California Energy Commission

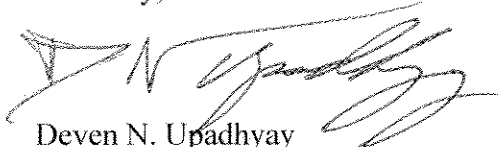
Page 3

September 29, 2011

California is a recognized leader in setting efficiency standards. The State is already using WaterSense standards in CalGreen, the mandatory green building code. Specifically, the California Code of Regulations Title 24, Part 11, Division 4.3 (Residential Water Efficiency and Conservation) and Division 5.3 (Non-residential Water Efficiency and Conservation) identify US EPA WaterSense toilets as the required standard in new construction. Using the US EPA WaterSense standards for landscape irrigation equipment continues this commitment to energy and water efficiency.

With this approach in mind, Metropolitan requests that the Committee give priority to adopting efficiency performance standards for landscape irrigation control equipment in the 2011 scoping order. If you need additional information, please feel free to contact my staff, Timothy Blair at tblair@mwdh2o.com or (213) 217-6613. Metropolitan looks forward to participating in the Committee's proceedings for the 2011 scoping order.

Sincerely,



Deven N. Upadhyay
Manager, Water Resource Management

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