



July 26, 2013

California Energy Commission
Dockets Unit
Docket # 12-AAER-2C
docket@energy.ca.gov

California Energy Commission

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12-AAER-2C

TN 71715

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Dear Commissioners:

The California-Nevada Section of the American Water Works Association (CA-NV AWWA) is an organization of the professional drinking water community, committed to providing safe and reliable water to the public. With approximately 5,400 members, over 4,700 of whom are located in California, we have a great interest in the Commission's proposed regulation of water meter efficiency.

CA-NV AWWA is committed to water efficiency, and is clearly aware of the energy embedded in drinking water. Our members have been on the forefront of developing and implementing water use efficiency measures for two decades. CA-NV AWWA developed and still administers the only (to the best of our knowledge) comprehensive certification of water use efficiency personnel in the United States. In general, we applaud the Commission's efforts to improve the efficiency of water- and energy-using appliances.

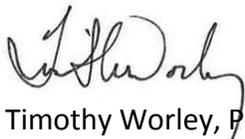
We do not, however, support the proposal for the Commission to create efficiency standards for water meters. Water meters are not an "appliance" in plain and common language, and it is over-reaching for the Commission to consider them such. We urge you to withdraw the proposed rulemaking with respect to water meters.

Before you determine that the accuracy of water meters is an appropriate matter for regulation as an "appliance" or under any other regulatory mandate, the Commission should consult with AWWA (an ANSI standards-setting body) about the challenges, and potential adverse consequences of doing so. The AWWA Water Meters Standards Committee, comprised of subject matter experts from a broad range and balance of stakeholder interests, including water utilities, meter manufacturers, governmental agencies, academia, and water industry consultants, has approved accuracy standards for many types of residential water meters. In June this year, this committee heard the proposal that NRDC has also put forward to the Commission during this pre-rulemaking. That committee has formed a task group to thoroughly investigate and respond to the NRDC proposal, an action we support. We expect more extensive comments to be submitted from AWWA, but several concerns support deferring action until the matter can be more carefully considered:

1. Improving meter accuracy at low flows makes the meter parts wear out faster, resulting in diminished accuracy at high and medium flows, and increasing the frequency of required repairs and replacement.
2. Tightening tolerances for better accuracy at low flows increases the incidence of particles (grit, sand) that may be carried by the water to become trapped, decreasing the meter's accuracy at low and medium flows and also increasing the frequency of maintenance.
3. The argument for increasing low flow accuracy is premised on being able to identify leaks, but it is not necessarily possible to distinguish a low flow resulting from a leak as opposed to low flows associated with a desired water use; identifying a leak on the customer side of the meter does not ensure that the leak will be corrected.
4. The changing industry standard toward Advanced Metering Infrastructure technology negates the value of the meter accuracy regulation that the Commission is pursuing, as the AMI technology will improve customer leak detection, access to real-time daily water use data, and ability to manage water use during peak demand periods.

The California-Nevada Section of AWWA welcomes the Commission's recognition of the linkage of energy and water efficiency, and support new efficiency standards where appropriate. We strongly encourage you to continue working with the water community on areas where the most benefit can be realized. We appreciate the opportunity to comment on this matter, and wish to be included as a stakeholder in the policy development process should the Commission choose to continue pursuit of a water meter policy.

Sincerely,



Timothy Worley, PhD
Executive Director