



A Chapter of the Alliance for Water Efficiency

February 7, 2024

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA 95814

Re: Docket Number 17-AAER-10 – Irrigation Controllers – Proposed Efficiency Standards – Support

Dear Commissioners:

The California Water Efficiency Partnership (CalWEP) is writing in general support of the California Energy Commission's (CEC's) proposed efficiency standards for landscape irrigation controllers. The proposed efficiency standards would require that all landscape irrigation controllers sold or offered for sale in California be weather-based controllers, soil moisture-based irrigation controllers, or both, and that such controllers align with the U.S. EPA WaterSense Specification for Weather-Based Irrigation Controllers Version 1.1 and U.S. EPA WaterSense Specification for Soil Moisture-Based Irrigation Controllers Version 1.0.

CalWEP is a membership-based non-profit organization with a mission to maximize urban water efficiency and conservation throughout California by supporting and integrating innovative technologies and practices; encouraging effective public policies; advancing research, training, and public education; and building collaborative approaches and partnerships. We have over 220 members, including water agencies, businesses, and other organizations. We are also a state chapter of the Alliance for Water Efficiency.

As California works to achieve its water conservation and efficiency goals, sustainable landscape transformation and efficient irrigation practices and technologies have become major focal points. CalWEP believes that the CEC's proposed efficiency standards for landscape irrigation controllers will help California achieve its goals and further promote sustainable landscaping and efficient irrigation throughout the state. The proposed standards will also help consumers save money through both energy and water savings. Based on these benefits, we support the CEC's proposed standards overall.

However, in order to maintain water efficiency in our landscapes, all four of the following factors must occur: landscape irrigation controllers must include features and specifications that support efficiency, installation and programming of landscape irrigation controllers must be done in the correct manner, irrigation controllers and landscapes must have proper maintenance and water management, and there must be proactive and continuing education of the users. CalWEP encourages the CEC to collaborate with our organization, the California Department of Water Resources, and trade associations to provide education for landscape irrigation professionals on the aforementioned four components. This will help to ensure that the benefits of the proposed efficiency standards for landscape irrigation controllers are maximized.

Additionally, CalWEP would like to acknowledge the comments shared by the U.S. Environmental Protection Agency WaterSense® program and product manufacturers, such as Rain Bird and Hunter Industries, regarding the CEC's proposed standards for landscape irrigation controllers. CalWEP is hopeful that through the rulemaking process, we can collaboratively find workable solutions to the concerns they have raised and maximize water efficiency throughout the state.

If you have any questions, please don't hesitate to contact me at tia@calwep.org or (916) 475-1204.

Sincerely,

A handwritten signature in black ink that reads "Tia Fleming".

Tia Fleming
Executive Director, External Affairs
California Water Efficiency Partnership