

April 17, 2026

California Energy Commission
Docket Unit, MS-4
Docket No. 17-AAER-10
715 P Street
Sacramento, CA 95814

Re: Docket#17-AAER-10, Project Title: Irrigation Controllers, Revised Draft Staff Report and Proposed Regulatory Language

Dear CEC Staff:

The California Water Efficiency Partnership (CalWEP) is writing in support of the California Energy Commission's (CEC's) proposed efficiency standards for landscape irrigation controllers.

CalWEP is a membership-based nonprofit organization dedicated to advancing water efficiency throughout California. Our members include over 265 water agencies, businesses, and organizations working collectively to improve water use efficiency through programs, policy, research, and public education.

As California continues to navigate long-term water supply challenges, efficient outdoor water use remains a critical component of statewide conservation efforts. Landscape irrigation represents a significant portion of urban water use, and the advancement of smart irrigation technologies plays an important role in reducing unnecessary water loss while maintaining functional and sustainable landscapes.

CalWEP appreciates the progress reflected in the CEC's revised proposal. In particular, the movement toward closer alignment with the U.S. EPA WaterSense framework represents an important step in ensuring consistency, market feasibility, and water savings performance across irrigation controller technologies.

At the same time, as the rulemaking process moves forward, CalWEP encourages the Commission to strike a thoughtful balance between implementation feasibility and the opportunity to advance the market toward higher-performing, water-efficient technologies. While technical considerations related to product definitions and performance specifications are important, California's long-term water supply challenges necessitate continued progress in improving irrigation efficiency standards. We encourage the Commission to maintain an approach that supports both practical implementation and meaningful water savings outcomes.

From a California water efficiency perspective, CalWEP supports the overall direction of the proposed standards and believes they will contribute meaningfully to improved outdoor water use efficiency across the state.

In addition to product standards, CalWEP emphasizes the importance of proper installation, programming, maintenance, and user education to fully realize the water savings potential of irrigation controllers. We encourage continued collaboration between the CEC, the California Department of Water Resources, and industry partners to support training and outreach efforts for irrigation professionals and end users.

If you have any questions, please do not hesitate to contact Tia Fleming, Executive Director, at tia@calwep.org or (916) 552-5885.

Sincerely,

A handwritten signature in black ink that reads "Tia Fleming". The signature is written in a cursive, flowing style.

Tia Fleming
Executive Director
California Water Efficiency Partnership