

February 7, 2023

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

**Re: Docket # 17-AAER-10 (Irrigation Controllers) – Staff Analysis of Proposed Efficiency Standards for Landscape Irrigation Controllers**

To whom it may concern:

On behalf of the approximately 1,300 member companies of the Irrigation Association, we appreciate the opportunity to respond to the Commission's *Pre-Rulemaking Comment Period for Landscape Irrigation Controllers Proposed Standards*.

The IA represents experts in all aspects of irrigation, including agriculture, landscape, turfgrass and golf. As stewards of water resources, irrigation professionals and companies recognize the important role we serve in ensuring water resources are accessible for future generations. Our industry and our members are committed to investing in new product development and adoption, while contributing expertise to encourage dialogue and successful solutions that have a lasting impact on the sustainability of our water resources.

We support efforts to foster enhanced water conservation and to advance efficient irrigation in California, and we recognize the important irrigation efficiency-energy use nexus. To that end, we provide the following comments to improve any final regulation and to advance workable solutions that promote energy and water conservation in the state. These comments were developed with input from across the irrigation channel to market — from irrigation manufacturers, distributors, designers and contractors — as well as water agency officials and other experts in irrigation and water use. We do emphasize that we have concerns with the practicality and feasibility of some aspects of the commission's proposal, as well as the costs it will impose on the industry and especially on end users in California. We look forward to continuing to collaborate with the Commission as this regulatory process progresses.

**Deviation from EPA WaterSense Specifications**

The IA and the broader irrigation industry have been proud partners with the EPA WaterSense program for years, and we are committed to collaborating with EPA and others to advance efficient irrigation

products and technology through this voluntary program. During the development of the WaterSense specifications for both soil moisture-based irrigation controllers and weather-based irrigation controllers, stakeholders from across the irrigation industry and technical experts from research and academic institutions contributed through a robust, years-long process. It is important to highlight that the development of these WaterSense specifications was under the auspices of a voluntary program. Taking a voluntary program and making it mandatory is not without its challenges. Notably, we emphasize potential future challenges that could develop if the WaterSense program modifies either specification, and we encourage the Commission to maintain maximum flexibility in the future and recognize that if modifications are made to a voluntary program to encourage innovation and market transformation, they may not be appropriate under a mandatory state regulatory regime.

While the Commission's proposal incorporates provisions that largely mirror WaterSense specifications, requiring products sold in California to be certified via a separate state process that deviates from the existing WaterSense process causes unnecessary burdens on manufacturers and could result in conflicts between the two test methods, with the result being increased costs for end users. Instead, we recommend that products which are WaterSense-certified be accepted into the Commission's Efficiency Standards for Landscape Irrigation Controllers and that those efficiency standards rely on the EPA WaterSense testing as the standard.

We also note that aspects of the proposal deviate from the existing WaterSense specifications and pose challenges for irrigation companies and professionals, water agencies and end users. If the Commission proceeds with a final regulation, we recommend the final requirements mirror those of the EPA WaterSense program.

### **Plug-In and Add-On Components**

The Commission's proposal would require that products that meet the WaterSense specification when used in conjunction with plug-in and add-on devices be sold and packaged together. This diverges from the requirements of the WaterSense program which allows these products to be sold separately, and it poses significant practical challenges to implement.

We note in particular that this will result in a significant number of new SKUs for manufacturers and the distribution channel to manage, which will increase costs for end users. In addition, the resulting increase in packaging material use, transportation costs and the physical space required to store inventory will have the unintended consequence of increasing, rather than decreasing, energy use for irrigation products. The requirements would also increase waste and prove costly for property owners who need to replace an existing controller, by forcing them to purchase add-on components that may not be needed.

In addition, water utilities frequently conduct assessments of irrigation systems and find that a basic improvement with significant and meaningful conservation gains is to recommend property owners add a peripheral to an existing controller. Because the property owner is familiar and comfortable with their existing controller, this has proven to be a successful model for water utilities to increase conservation.

We are concerned that without modification, the Commission's proposal could hamper these conservation activities and actually disincentivize conservation.

### **Battery-Operated Controllers**

The Commission's proposal would include battery-operated controllers within the scope of the regulations. This requirement is problematic based on the real-world applications of these products which are frequently used in temporary applications or in locations where power and Wi-Fi signals are unavailable. We recommend the Commission exclude battery-operated controllers from the scope of the proposal, or at a minimum allow for a later phase-in for these products to enable further technological development.

### **Implementation Timeline**

As irrigation product sales are highly seasonal, we recommend the implementation date be delayed until January 2026 at the earliest, rather than a mid-year effective date, so that the change does not take effect in the middle of the irrigation season. A January effective date would allow the distribution channel to take advantage of the typical inventory cycle for these products to better manage distribution and inventory.

### **Education and Training**

We underscore the important role qualified irrigation and landscape professionals will play in implementing this regulation, as well as the critical need for education for end users to most effectively use and operate these products. To that end, it is vital that funding be made available for grants and other partnerships to provide needed education and training to professionals, as well as end users.

We appreciate the opportunity to review and comment on both the draft proposed regulations and the draft staff analysis report on behalf of the entire irrigation industry. We understand that a number of IA member companies will be submitting comments on the Commission's proposal as well; we encourage the Commission to consider input from across the industry, and we look forward to continuing to engage through the process.

Thank you for your consideration of this request. Please contact Nathan Bowen (nathanbowen@irrigation.org), IA advocacy and public affairs vice president, for additional information.

Sincerely,

A handwritten signature in black ink that reads "Natasha L. Rankin". The signature is written in a cursive, flowing style.

Natasha L Rankin, MBA, CAE  
Chief Executive Officer