NRDC

ASAP | APPLIANCE STANDARDS AWARENESS PROJECT

September 18, 2017

California Energy Commission
Docket Office, MS-4
1516 Ninth Street
Sacramento, CA 95814

Re: Docket No. 17-AAER-08, Spray Sprinkler Bodies

Our organizations support the recommendations contained in the Codes and Standards Enhancement (CASE) Initiative Report filed this day by the four California Investor Owned Utilities – Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), Southern California Edison (SCE), and SoCalGas® (Statewide CASE Team) containing a standards proposal for spray sprinkler bodies (SSBs).

In light of the proposed standard's large volume of estimated water savings, the substantial margin of life-cycle benefits to costs for consumers, and the continuing need for California to make more efficient use of public water supplies and avoid water waste, we urge that this standard be approved and adopted by the commission at the earliest practical date.

We offer the following observations on the CASE Team's proposal:

- We support the inclusion of check valves in the recommended standard. While the volume of water savings is small relative to the savings attributable to pressure regulation, it is nevertheless a meaningful saving of water and the standard overall remains highly cost-effective with both pressure regulation and check valves covered. Additionally, check valves are required by MWELO on any landscape where low head drainage could be a problem. Enforcement of this provision could be greatly simplified by including the requirement for check valves here in Title 20 regulations.

- Due to limitations in available data, benefit calculations are omitting potential savings and rendering the benefit estimates quite conservative. For example, due to lack of data, no benefits are credited for SSBs used in any commercial landscape, although these numbers are undoubtedly substantial. For another example, in the base case analysis, residential consumers are assumed to have modified irrigation run times to account for excess pressure, even though many if not most consumers have not done so. Thus, no benefits are credited for SSBs for this increment of savings.

- Importantly, we note that the US EPA WaterSense Program is nearing completion on a performance specification for SSBs, and that the test

method under consideration employs a needle valve for flow control. An alternative approach is to use a standard nozzle for flow control. We support further testing to isolate the effect of this particular facet of the test procedure. It is important that the Title 20 test procedure and the WaterSense test procedure be compatible, if not identical. In other words, test procedures may vary in their degree of rigor, as in the number of pressures used as test points, but should not be made mutually exclusive by the inclusion of material differences in the test set-up that would require two completely separate sets of tests to certify compliance with the Title 20 and WaterSense requirements.

Thank you for your attention to these views.

Sincerely,

Edward R. Osann
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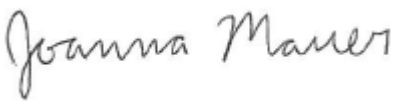
Natural Resources Defense Council



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