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MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

March 29, 2006

The Honorable Samuel W. Bodman
Secretary of Energy
United States Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Secretary:

Support for Petition to Exempt From Preemption California's Water Efficiency Standards for Residential Clothes Washers - Docket Number EE-RM-PET - 100

The Metropolitan Water District of Southern California strongly urges approval of the subject petition submitted by the California Energy Commission. Metropolitan has implemented a variety of conservation programs designed to reduce Southern California's demand for imported water supplies. This commitment is demonstrated through investment of more than $234 million in incentives for device retrofits over the past 10 years. Consistent with the growing trend in California, it is timely to pursue actions that benefit the public with concurrent efficiencies in water and energy.

Approval of the petition will permit California to enact the California Energy Commission's adopted water efficiency standards of 8.5 WF effective January 1, 2007, followed by a 6.0 WF standard effective January 1, 2010. These standards would accelerate replacement of less efficient conventional washers, conserve water and energy, and help Metropolitan meet its regional commitment to reduce the demand of imported water supplies to Southern California.

Our conservation goals are guided by Metropolitan's Integrated Water Resources Plan (IRP), which includes high efficiency clothes washers as a core strategy to meet the 2025 regional conservation target of 1.1 million acre-feet per year. To date, Metropolitan and its member agencies have provided incentives for more than 150,000 HECW retrofits that save more water than traditional top-loaded models. In December 2005, Metropolitan increased its base incentive to $75 per unit and limited eligibility to models with Water Factor (WF) 6.0 or less. WF represents the amount of water needed to clean a standard load of laundry. Machines with lower WF save more water. Metropolitan's HECW efficiency standard is consistent with standards proposed in the Petition.

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We support approval of the Petition, which is an integral part of California's commitment to reduce dependence on imported water supplies and save energy. The proposed standards will help California achieve this goal.

Very truly yours,

Jeffrey Kightlinger
General Manager

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