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Rancho Water

April 6, 2006

Mr. Samuel W. Bodman
Secretary of Energy
UNITED STATES DEPARTMENT OF ENERGY
1000 Independence Avenue, SW
Washington, DC 20585

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Best Best & Krieger LLP
General Counsel

SUBJECT: EM-RM-PET-100, CALIFORNIA PREEMPTION EXEMPTION PETITION

Dear Mr. Secretary:

On behalf of Rancho California Water District ("RCWD"), I strongly urge you to approve the Petition to Exempt from Preemption, California's Water Efficiency Standards for Residential Clothes Washers.

Rancho California Water District currently serves a population of approximately 110,000 in the City of Temecula, portions of the City of Murrieta and unincorporated areas of Riverside County, California. According to the Southern California Association of Governments, the District's population grew 30-percent from 2000 to 2005 and is forecast to grow to more than 165,000 in the next twenty-five years. To serve the growing demand for quality water, 40-percent of the supply is imported from sources hundreds of miles from the District. RCWD recently adopted a Regional Integrated Resources Plan to develop a long-term water supply strategy to meet water demands from now until 2050. Improving water use efficiency is a vital part of RCWD's resource planning, and is the most cost-effective source for water needed to meet the current and future needs of customers in our service area and, in fact, the entire state of California.

The California State Water Project, the nation's largest state-built water conveyance system of reservoirs, lakes, power plants, pump stations, canals, tunnels and a 444 mile-long aqueduct, is the largest single user of electricity in the state. More efficient water use will substantially reduce energy costs and use. California's water and energy providers must pursue highly efficient and cost-effective energy and water conservation strategies and solutions. In 2002, the California State Legislature declared that "a significant portion of urban water demand in the state is for residential clothes washers" and that "water conservation is a proven tool that will make the most effective use of the state's limited supply, and will conserve energy." As a result of these declarations, the California Energy Commission ("CEC") adopted water efficiency standards for residential clothes washers to address the unique and compelling interests and needs of California.

Rancho California Water District
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Implementation of the CEC water efficiency standards for residential clothes washers will result in significant reduction in use and cost to pump, treat and provide reliable state water supplies while also reducing energy consumption and costs required to maintain and operate water delivery systems and wastewater treatment facilities. RCWD supports a residential clothes washer water efficiency standard of 8.5 effective January 1, 2007 followed by a 6.0 standard effective January 1, 2010 to conserve and manage supplies for a growing population. Implementation of these standards will create tremendous water and energy savings while supporting legal obligations to reduce use of imported water deliveries. A fully implemented 8.5 water factor standard will save as much energy as the annual usage for approximately 50,000 California homes, and the 6.0 water factor will save the equivalent annual energy use of approximately 85,000 California homes. The water efficiency standards will save 204,387 acre-feet of water per year state-wide. An acre-foot is equivalent to 325,850 gallons of water.

I sincerely hope you will approve the Petition to Exempt From Preemption California's Water Efficiency Standards for Residential Clothes Washers. It is critical to the state's economy and quality of life of populations that will make California their home for generations to come.

Sincerely,

RANCHO CALIFORNIA WATER DISTRICT

Dr. Brian Brady
General Manager

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