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CITY OF GLENDALE, CALIFORNIA
Office of the Mayor

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April 6, 2006

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

RE: Petition To Exempt From Preemption, California's Water Efficiency Standards For Residential Clothes Washers
Docket # EE-RM-PET-100

Dear Mr. Secretary,

The City of Glendale strongly urges your support for the California Energy Commission's petition to exempt from preemption California's Water Efficiency Standards for Residential Clothes Washers. As a municipal purveyor of both water and electricity, Glendale *Water & Power* (GWP) has always been concerned with the sustainability and reliability of California's water supply, as well as the close link between water consumption and high energy costs.

Water efficiency standards for appliances are not the only solution, but are important parts of a large array of strategies to conserve and manage supplies. Implementation of these standards will create tremendous water and energy savings for the region, while supporting legal obligations to reduce use of imported water deliveries. Therefore, GWP supports a residential clothes washer water efficiency standard for California of 8.5 effective January 1, 2007, followed by a 6.0 standard effective January 1, 2010.

California has the most extensive water importation and distribution system in the nation. Transporting and delivering volumes of water almost 450 miles across mountain ranges and over high elevations causes the State Water Project aqueduct to be the largest single user of electricity in the state.

Conveying water these great distances not only increases costs, it also greatly increases water reliability concerns. 70% of Glendale's water supply is imported water purchased through the Metropolitan Water District of Southern California. Consequently, GWP supports all cost-effective methods to increase local water supplies or decrease water demand.

Glendale *Water & Power,* along with other agencies and municipal water suppliers throughout California, continually supports water conservation methods while researching methods to reduce the increasing demand on water supplies. Although, GWP is taking steps to increase our local supply of water, that source is limited. Local groundwater and surface supplies account for only 7 percent of our water deliveries. One of Glendale's well fields is included in the San Fernando Valley EPA Superfund site. Treating the groundwater from this area has made it possible to add it to our system. However, it only adds 20 percent to our local supply.

Glendale has taken a leadership role in a study to develop the technology for removing chromium 6 from drinking water. If this technology is developed, it will enable us to deliver additional groundwater, but would only increase our local usable supplies by a very limited amount.

There is no single solution to secure California's water future, nor to fulfill our commitment to provide a reliable source of water for our community. Therefore, Glendale *Water & Power* has concentrated on implementing cost-effective methods to improve water efficiency and decrease our community's demand for potable water supplies.

A 20-mile recycled water system has been installed with plans to extend it as needed. School athletic fields, parks, cemeteries and other large landscaped areas are irrigated with water from this system. However, recycled water accounts for only 4% of the water we deliver. In 1995, we revised our Municipal Code to include a "no water waste" section and to mandate that all new downtown commercial-building construction must include a potable and recycled dual plumbing system.

Water conservation and education are the remaining elements in our long-term water supply equation. We present a comprehensive water and electric conservation education program to sixth grade students in Glendale public and private schools. To encourage efficient water use in our community, we offer on-site surveys, conduct extensive public education programs and supply free water-saving devices. Providing rebates to our residential and commercial customers when they purchase water and energy efficient appliances is a significant component in our conservation efforts.

Just as energy efficiency standards are effective in energy conservation, water efficiency standards for appliances can play an important part in the success of essential conservation programs in California. Once again, we urge you to approve the Petition to Exempt from Preemption California's Water Efficiency Standards for Residential Clothes Washers .

Sincerely,

David Weaver
Mayor