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Department of Water and Power the City of Los Angeles

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April 6, 2006

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

Dear Mr. Secretary:

Subject: Support for Petition to Exempt From Preemption California's Water-Efficiency Standards for Residential Clothes Washers

On behalf of the Los Angeles Department of Water and Power, I strongly urge you to approve the Petition to Exempt from Preemption California's Water-Efficiency Standards for Residential Clothes Washers.

California's water use is intricately linked to high energy costs and consumption. As the nation's largest water user with a vast water transportation infrastructure, California's water systems are uniquely energy-intensive due to pumping requirements to deliver volumes of water long distances, over high elevations, and across mountain ranges. The 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. The amount of energy required to support the state's water delivery system and energy requirements associated with treating, pumping, and delivering water from water supply sources to population centers is of increasing concern throughout the state. It is clear that more efficient water use will substantially reduce energy costs and use.

Due to the state's unique water and energy circumstances, California 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 adopted water-efficiency standards for residential clothes washers to address the unique and compelling interests and needs of California.

Implementation of state water-efficiency standards will result in significant reduction in use, thereby, reducing the cost to pump and treat water at the state and local levels while improving

the reliability of the state's water supplies. Coincident reductions in energy consumption and costs required to maintain and operate water delivery systems and wastewater treatment facilities will be realized. The amount of energy that will be conserved as a result of water-efficiency standards will be significant. 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.

Along with increased consumer energy and water cost savings, these water-efficiency standards will not burden the clothes washer industry. Instead, these standards will positively impact the manufacturing, marketing, distribution, sale, and servicing of high- efficiency washers. Today, most appliance manufacturers, large and small, already produce these types of high-efficiency washers that comply with proposed standards. Thirty percent of the clothes washers sold in California already comply with the 8.5 standard, while 20 percent of sales already comply with the 6.0 standard. Various financial rebate programs and educational programs throughout the state are already in place to support and increase the sale of these washers. However, if provided this preemptive waiver, California can achieve a 100-percent market share, increasing sales competition, and gross revenue of the clothes washer industry while conserving precious natural resources.

As California uses more water than any state and will continue rapid population growth, I support 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 for the region while supporting legal obligations to reduce use of imported water deliveries. It is crucial that California carry out these water-efficiency standards and responsibly reduce its dependence on overly tapped and energy-intensive regional and imported water supplies. Water-efficiency standards for residential clothes washers will help California achieve this goal.

I sincerely hope you will approve the Petition to Exempt from Preemption California's Water-Efficiency Standards for Residential Clothes Washers.

Sincerely,

Ronald F. Deaton

Ronald F. Deaton
General Manager

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