SMUD
SACRAMENTO MUNICIPAL UTILITY DISTRICT
The Power To Do More.℠

#54

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April 6, 2006
AGM/ED&CS 06-010

Samuel W. Bodman
Secretary of Energy
United States Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

RE: SUPPORT FOR PETITION TO EXEMPT FROM PREEMPTION CALIFORNIA'S WATER EFFICIENCY STANDARDS FOR RESIDENTIAL CLOTHES WASHERS

Dear Secretary Bodman:

The Sacramento Municipal Utility District (SMUD) strongly urges you to approve the California Energy Commission's (CEC) Petition to Exempt from Preemption California's Water Efficiency Standards for Residential Clothes Washers. The case for exemption has been clearly and vigorously set forth and substantiated in this CEC document.

SMUD supports California's 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. SMUD has been supporting energy- and water-efficient residential clothes washers, through marketing, consumer education and rebates, and retailer and manufacturer partnerships, since 1993. SMUD has been one of the utilities that, as the CEC's petition notes, "have been effective in initiating market transformation" [9.28]. Yet, as the petition also points out, utility promotions "were neither designed nor expected to fully transform the entire market…On the other hand, the California standards, if given a waiver by DOE, will achieve a 100 percent market share" [*ibid*].

Implementation of these standards will create tremendous water and energy savings for the Sacramento region as well as the state. 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.

We strongly urge you to, and sincerely hope you will, approve the Petition to Exempt From Preemption California's Water Efficiency Standards for Residential Clothes Washers.

Sincerely,

John DiStasio
Assistant General Manager
Energy Delivery and Customer Services