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WEB™ multifamily laundry systems

March 30, 2006

VIA ELECTRONIC AND U.S. MAIL

Ms. Brenda Edwards-Jones
U.S. Department of Energy
Building Technologies Program
Mailstop EE-2J, Room 1J-018
1000 Independence Avenue SW
Washington, DC 20585-0121

Re: EE-RM-PET-100 (Office of Energy Efficiency & Renewable Energy) California Energy Commission Petition for Exemption from Federal Preemption of California's Water Conservation Standards for Residential Clothes Washers

Dear Ms. Edwards-Jones:

Web Service Company ("WEB") is the largest operator of multi-family laundry equipment in California, with laundry facilities in over 29,000 locations throughout the State. On behalf of WEB and its 675 California employees, I am writing in support of the California Energy Commission's Petition for Exemption from Federal Preemption, to allow California to regulate the water efficiency of residential clothes washers sold in the State (the "California Petition").

WEB's support for the California Petition stems primarily from a desire for residential clothes washers to be subject to the same regulations as their commercial cousins.

For the past several years, California has treated commercial and residential washing machines differently, despite the reality that the commercial and residential washers are mechanically almost identical. In fact, commercial washing machines (i.e., coin-operated machines in apartment complexes) have historically been based on the same platforms as residential washing machines. When manufacturers are instead compelled to develop a unique platform for commercial machines to be sold in California, limited supplies and higher purchase prices result.[1]

[1] WEB therefore submits that the application of equivalent water-efficiency standards to residential and commercial machines will improve (rather than reduce) product availability. This is an important consideration, pursuant to 42 USC §§6297(d)(3)(C) and (d)(4).

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Higher purchase prices for California commercial machines are inevitably passed along to the users of those commercial machines, who are predominantly lower-income families and college students. Increases in the costs of using commercial machines have, in turn, accelerated migration toward the use of residential clothes washers. Ironically, this phenomenon has been antagonistic to the State's efforts to save water and electricity, because users of residential machines routinely wash smaller and more frequent loads than users of commercial machines.[2]

Please feel free to contact me with any questions, and please notify me of any public workshops or additional comment periods regarding the California Petition. It is important for the Department of Energy to hear from businesses like WEB, that view California's even-handed regulation of residential and commercial washing machines as essential to achieving water- and energy-efficiency objectives without disproportionately impacting lower-income households.

Sincerely,

William E. Bloomfield, Jr., President
Web Service Company, Inc.

[2] Customers of coin-operated laundry facilities tend to do a higher percentage of full-load cycles, and wash fewer loads overall, than people who have machines inside their residences. Incidentally, over ninety percent of coin-operated clothes *dryers* are gas-fired, while a similar proportion of domestic clothes dryers found in multi-family dwellings are electric-powered. Because a measurable portion of California's peak electricity demand is caused by residential clothes drying, accelerating the migration toward residential machines will only compound the very energy-market imbalances the California Energy Commission is attempting to solve.