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March 29, 2006

Ms. Brenda Edwards-Jones
U.S. Department of Energy
Building Technologies Program
Mailstop EE-25, Room 1J-018
1000 Independence Avenue, S.W.
Washington, D.C. 20585-0121

Re: Support for Petition to Exempt From Preemption California's Water Efficiency Standards for Residential Clothes Washers – Docket Number EE-RM-PET-100

On behalf of Eastern Municipal Water District (EMWD), we 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, across mountain ranges and over high elevations. 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 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. 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.

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Along with increased consumer energy and water cost savings, these water efficiency standards would not burden the clothes washer industry. Instead, they would positively impact the manufacturing, marketing, distribution, sale and servicing of these high efficiency washers. Today, most appliance manufacturers, large and small, already produce these types of high efficiency washers and comply with proposed standards. While 30 percent of California's sale of washers already comply with the 8.5 standard, 20 percent of sales already comply with the 6.0 standard. Various rebate incentive and educational programs throughout the state are also in place to support and increase the sale of these washers and currently account for 39 percent of the market. However, if provided this preemptive waiver, California can achieve a 100 percent market share and increase sales competition and gross revenue of the clothes washer industry.

As California uses more water than any state and will continue rapid population growth, we 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.

Again, EMWD encourages you to approve the Petition to Exempt From Preemption California's Water Efficiency Standards for Residential Clothes Washers – Docket Number EE-RM-PET-100. This petition is critical to the state's economy and to the quality of life of populations that will make California their homes for generations to come.

Sincerely,

Anthony J. Pack
General Manager