CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION

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March 28, 2006

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

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

Dear Mr. Secretary:

The California Municipal Utilities Association (CMUA) urges your approval of 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.

CMUA has long supported technological means of accomplishing energy and water conservation and has twice successfully sponsored California legislation lowering the water consumption of toilets in new construction. Such improved standards accomplish meaningful conservation without relying on lifestyle changes of consumers.

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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We sincerely hope you will approve the Petition to Exempt From Preemption California's Water Efficiency Standards for Residential Clothes Washers. It is critical to the state's economy and quality of life of populations that will make California their home for generations to come.

Sincerely,

Jerry Jordan
Executive Director

cc: California Energy Commissioners