



# City of Downey #60

FUTURE UNLIMITED

April 7, 2006

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

RE: Docket number EE-RM-PET-100, Petition To Exempt From Preemption, California's Water Efficiency Standards For Residential Clothes Washers

Dear Mr. Bodman,

The City of Downey supports the California Energy Commission petition to exempt from preemption California's Water Efficiency Standards for Residential Clothes Washers, filed on behalf of the State of California. Sustainable water efficiency is a major aspect of our efforts to assure that a safe and reliable water supply is available to our residents, businesses and public areas.

Water use projections indicate that by fiscal year 2009/2010 the City of Downey will need to deliver 17,440 acre-feet per year to consumers within the City of Downey service area. This is an increase of over 760 acre-feet from fiscal year 2004/05. In order to meet future water demands, the City has adopted a water management plan that utilizes water conservation as an integral aspect of meeting the City's future needs. We at the City of Downey urge you to consider the unique characteristics of California that offers convincing reasons for this state-wide exemption. We ask that you consider the following:

### **California's Interests are Unusual and Compelling**

California has the most extensive water importation and distribution system in the nation. Most of the state's water demand is more than 300 miles from the water source. Much of California's water supply travels through the Sacramento Delta, with the supplies destined for Southern California traveling through a myriad of levees and canals that traverse the Central California valley. Now, many of the aging levees in the Sacramento Delta have been found to be susceptible to failure.

The extent of the problem has become so great that the Governor of California has recently requested that the Delta levees be granted National Emergency status. Should levees in certain areas of the Delta fail, there could be immediate impacts to the water

supplies of Southern California. The sources of failure include natural failure caused by age or poor maintenance practices, failure due to catastrophic flooding or earthquake, or failure caused by intentional acts.

In addition to the supplies from the Sacramento Delta region, Southern California also receives vast amounts of imported water from the Colorado River from the Metropolitan Water District of Southern California (MWD). MWD imports water through the use of lakes, canals, dams and pump stations that extend from the Colorado River to much of Southern California, supplying an estimated population of over 18,000,000. This supply system is also susceptible to failure by earthquakes or intentional acts.

Although both combined supply sources can meet the needs of Southern California at this time, limits to the amounts of water that can be exported from the Sacramento Delta and the Colorado River can change, impacting the amount of water that can be utilized by this highly populated, business oriented, and diverse geographical area.

No other state is so susceptible to the catastrophic effects of natural or intentional interruptions in water supply. Water use efficiency can greatly minimize the severe negative impact of major interruptions in California's unique and precarious water supply network.

### **California's Unique Water-Economy Situation**

The State of California, with the fifth largest economy in the world, is highly dependant on an adequate and reliable water supply. Water shortages would have an immediate impact on the economy on the State, which would then impact the economy of the rest of the nation. Water efficiency offers California its most cost effective source of water to feed its economy; an economy the entire nation depends on for financial stability.

### **Alternative Approaches Implemented**

There are many other cost-effective methods to improve water use efficiency, and we have already implemented a number of them. Improving the efficiency of clothes washers is only part of the overall solution for reliable water supply, yet it is a vital part.

The City of Downey evaluates water efficiency options and water supply options equally in its planning process. We strive to implement all of the most cost-effective strategies available. Improving the efficiency of clothes washers will not reduce our efforts to move forward with other water conservation activities. Our efforts to provide a reliable source of water to our costumers include the following:

- Reduced Rates For Recycled Water Use
- Public Education
- Zero Water Consumption Urinal Program
- Pre-rinse Spray Nozzle Rebates
- High Efficiency Clothes Washer Rebates
- Weather Based Irrigation Controller Rebates
- Commercial Clothes Washers Rebates
- Water Broom Rebates

The City of Downey cannot afford to dismiss any reasonable and cost effective method to increase water supply or decrease water demand. Recycled water offers potential, but is limited to non-potable uses and requires a substantial investment in distribution network design and construction. Desalinization requires development and operating costs far greater than traditional water sources. In addition, increasing desalinization increases energy use, while California is taking measure to reduce its energy use and greenhouse gas emissions.

There is no single solution to secure California's water future, and the City of Downey is committed to provide a reliable source of water to meet the needs of the community it serves.

### **Exemption from Preemption is Necessary**

Water efficiency standards for appliances are not the only solution, but are a very important part of a large array of strategies to solve our impending water crisis. Clothes washers are a major water use in 80% of homes. High efficiency washers save more than 50% of the water used by traditional washers. A typical family using an efficient washer could save up to 6,000 gallons of water per year.

For the City of Downey this represents savings of approximately 117,474,000 gallons of water per year. We must reduce this waste by every means available, without undue financial burden to the ratepayers. Currently, our only available action is to offer rebates to encourage the purchase of the high- efficiency washers; this method has limited effect and is very costly, compared to appliance standards. Ratepayers bear an undue burden because washer efficiency standards cannot be adopted by the State.

We urge you to accept California's petition to allow California to determine its own water future without the need for Federal assistance. Please grant the preemption necessary for California, its citizens and the City of Downey to secure a safe and reliable water supply for the state.

Sincerely,

*Brian A. Rayland*

for Desi Alvarez, P.E.  
Director of Public Works