



City of  
**Santa Monica**

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**#10**

March 29, 2006

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

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

Dear Mr. Secretary:

On behalf of the City of Santa Monica, I 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 State Water Project, the nation's  
largest state-built water conveyance system of reservoirs, lakes, power plants,  
pump stations, canals, tunnels and a 444 mile-long aqueduct, is the largest  
single user of electricity in the state. 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.

Along with increased consumer energy and water cost savings, these water efficiency standards would not burden the clothes washer industry. Instead, these standards 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. Currently 30 percent of California's washer sales already comply with the 8.5 standard and 20 percent of sales 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. California sales of energy efficient washers currently account for 39 percent of the total US market. If provided this preemptive waiver, California can significantly increase sales of efficient washers 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, The City of Santa Monica supports 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. 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.

I urge you to approve the Petition to Exempt from Preemption California's Water Efficiency Standards for Residential Clothes Washers.

Sincerely,



CRAIG PERKINS