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A PUBLIC ENTITY SERVING CHANNEL ISLANDS BEACHES AND HARBOR

**#26**

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March 27, 2006

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

**SUBJECT: Petition To Exempt From Preemption, California's Water Efficiency Standards For Residential Clothes Washers**

**Docket Number - EE-RM-PET-100**

The Channel Islands Beach Community Services District supports the California Energy Commission petition to exempt from preemption 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 California citizens, businesses and the supporting environment. The Channel Islands Beach Community Services District is a very small District and cannot afford to expend large sums to secure additional water sources. We therefore urge you to consider the unique characteristics of California that offer convincing reasons for this 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 water demand is more than 300 miles from the water source. One of our water supplies is the Sacramento/San Joaquin Delta. That supply is located more than 300 miles to the north of our community. The other water source is from groundwater and it must be treated at a very high cost to be acceptable supply.

The extensive importation and distribution of water supplies not only increases costs; it greatly increases security risks. Much of California's water supply travels through the Sacramento Delta, contained and channeled to Southern California through a myriad of levees. Now, these aging levees are susceptible to failure. The liability has become so great that the Governor of California has recently requested that the Delta levees be granted National Emergency status. Seawater intrusion threatens groundwater sources where over-pumping has become necessary; further surface water interruptions could cause irreparable damage. 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**

California's economy, equivalent to that of the fifth largest country worldwide, is dependant on an adequate and reliable water supply. Impacting California's economy with water shortages will have a negative ripple effect on the entire 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 alternative cost-effective methods to improve water efficiency, and we are already implementing 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 Channel Islands Beach Community Services District evaluates water efficiency options and water supply options equally in its planning process. We implement all of the most cost-effective strategies available. Improving the efficiency of clothes washers does not supplant other reasonable means available. Our efforts to provide a reliable source of water California include the following:

- Increasing block rates
- Leak detection program within our system
- Leak detection assessment of customer facilities
- Local Ordinances
- Public information handout in each bill
- Local School information

The Channel Islands Beach Community Services District cannot afford to dismiss any reasonable and cost effective method to increase water supply or decrease water demand. Water availability, safety concerns and legal rights limit our ability to increase water production. Reclaimed water offers potential, but is limited to non-potable uses and requires a huge investment in dual distribution network and building design. 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 not a single solution to secure California's water future, and the Channel Islands Beach Community Services District commitment to provide a reliable source of water to meet the needs of its customers.

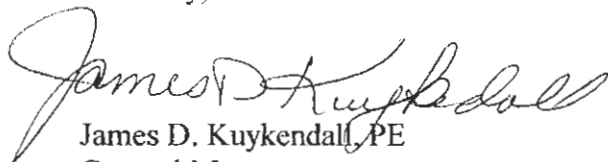
### **Exemption from Preemption is Necessary**

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 wasted by traditional washers. A typical family using a non-efficient washer wastes more than 6,000 gallons of water per year. We must stop this waste by every means available, and 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 Channel Islands Beach Community Services District to secure a safe and reliable water supply for the state.

Sincerely,



James D. Kuykendall, PE  
General Manager