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To: california.petition@ee.doe.gov
cc: jdeleon@mwdh2o.com, lgordon@sdewa.org
Subject: Docket number EE-RM-PET-100
 Federal Record Not a Federal Record

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April 6, 2006

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

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

The Western Municipal Water District supports the California Energy Commission petition to exempt from preemption filed on behalf of the State of California, California's water efficiency standards for residential clothes washers. 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. Western Municipal Water District urges 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. The water source for Western Municipal Water District is all imported from both the State Water Project and the Colorado River.

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.

The Western Municipal Water District serves more than one-half million people. Improving water use efficiency is a vital part of our resource planning, and is the most viable source for water needed to meet the current and future needs of our customers. In addition, water efficiency minimizes the hardships our customers will endure in the event of potential water supply crises.

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California's Unique Water-Economy Situation

California's economy, equivalent to that of the fifth largest country worldwide, is dependent 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 Western Municipal Water 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 for California includes rebates for other water conserving devices from weather-based irrigation controllers to cooling towers, school education programs, public seminars, conjunctive use projects and desalters.

The Western Municipal Water 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. There is not a

single solution to secure California's water future. Western Municipal Water District is committed to providing a reliable source of water to meet the needs of the communities 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 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 Western Municipal Water District to secure a safe and reliable water supply for the state.

Sincerely,

John Rossi
General Manager
Western Municipal Water District