



May 23, 2016

California Department of Water Resources  
Division of Integrated Regional Water Management  
Financial Assistance Branch  
Post Office Box 942836  
Sacramento, CA 94236  
Attn: Leslie Pierce  
*Sent via electronic mail to: [DWR\\_IRWM@water.ca.gov](mailto:DWR_IRWM@water.ca.gov)*

**RE: Water-Energy Grant Program, Guidelines and Proposal Solicitation Package**

To whom it may concern:

Thank you for the opportunity to comment on the Department of Water Resources' (DWR) Water-Energy Grant Program Guidelines and Proposal Solicitation Package. We support restricting the scope of the Water-Energy Grant Program to projects that will result in water and energy savings from specified products in the commercial and institutional sector. In addition, for this grant cycle, we support limiting the energy savings by which the projects will be evaluated to onsite savings, rather than including savings from embedded energy, because it simplifies the comparison of project proposals. Going forward, however, we recommend that DWR consider utilizing the water-energy calculator tool developed by the California Public Utilities Commission (CPUC) that is designed to evaluate the embedded energy in water so that other water using products could be included in future grant packages.

Regarding the draft Greenhouse Gas Emission Reduction Calculator tool that DWR developed for use by grant applicants, we have a few recommendations.

**Commercial Faucets**

The Water-Energy Grant Program is limited to commercial applications; therefore the default values in the calculator should be for commercial products. Currently, the draft calculator tool defaults to flow rates for residential lavatory faucets rather than commercial or public lavatory faucets<sup>1</sup>. Although applicants can modify the flow rates in the calculator, we recommend that the default be the commercial/public lavatory faucet flow rates.

**Showerhead**

The draft calculator tool assumes that the average shower lasts 5 minutes long, but studies have shown that the average shower lasts 8.2 minutes<sup>2</sup>; therefore we recommend that the average shower duration in the calculator tool be changed to 8.2 minutes.

---

<sup>1</sup> <http://www.energy.ca.gov/2015publications/CEC-400-2015-015/CEC-400-2015-015-CMF-marked.pdf>, page 7

<sup>2</sup> U.S. Department of Housing and Urban Development and U.S. Census Bureau. American Housing Survey for the United States: 2007. 2008. Table 1A-5, page 7.

If you have any questions or comments, please contact me at (310) 434-2300 or [tquinn@nrdc.org](mailto:tquinn@nrdc.org)

Sincerely,

A handwritten signature in black ink, appearing to read "Tracy Quinn". The signature is fluid and cursive, with a prominent initial "T" and a long, sweeping underline.

Tracy Quinn, Senior Policy Analyst  
Natural Resources Defense Council