

commentletters



From: Azita Yazdani <ayazdani@exergycorp.com>
Sent: Monday, January 25, 2016 8:44 AM
To: commentletters
Subject: ³2/2/16 BOARD MEETING (Conservation Extended Emergency Regulation)²

Dear State Water Board,

I would like to submit the following comments related to the proposed regulation for the "*Conservation Extended Emergency Regulation*":

General comments:

As a technical expert in water use reduction, recovery and reuse, and one who has worked with a number of commercial industrial and institutional (CII) customers across the State, it has come to our attention that the water agencies throughout the State, in particular in Urban Areas of the State, are not enforcing the Water use reduction mandates of the Governor's Executive Order.

We have discussed these requirements with many customers and they either believe the requirements are not applicable to them or they believe that the State will not enforce these requirements with businesses so they do not need to worry about it. We believe a strong public campaign should be conducted to inform all customers that the water is a major issue across the State and it applies to all. It would be helpful if this regulation clarifies the requirements for all users, and their obligations to meet the State standards.

Also, we must add that our studies of onsite recycling and recovery at a number of CII sector customers have shown that these activities (and projects) to reduce and recycle water, normally have an attractive payback and return on investment (ROI) thus it is reasonable to assume that water recycling has also an economic benefit that in many instances is disregarded by customer.

Customers also tend to not trust or be knowledgeable about water recycling and reuse approaches and technologies. They are not very familiar with the technologies related to water recycling that can be used on site and thus, are not willing to consider implementing and using them.

Specific Comments:

Section 865(b): I believe this section should require the urban water supplier to also provide water usage figures for CII sector- if possible by sub sector, Commercial vs. industrial vs. Institutional. We believe the urban water suppliers have such data and the only way to assess if such programs are being properly implemented is to get data from them on each sector, to assess achieved reductions by segment. It is very confusing to get this data for the combination of these sectors.

Section 866(b): Any fines for compliance or lack of should be set based on the type of user, such as residential, commercial, industrial, and institutional users – if water agencies will be asked or allowed to collect fines. Also, as to assess how much each urban water agency has been in compliance, the overall reduction alone may not show an even and prior picture of reduction/conservation that can be achieved.

Also, please clarify if that these fines are also applicable to those that do not meet the 25% (or other local restriction) reduction goals set. We have come across one urban water agency (that we can provide the name) that is only asking customer to reduce 8%! This is an agency with many CII customers.

Thank you for the opportunity to comment on the proposed regulations. Please contact me at this email or the number below if there is any questions regarding these comments.

Best regards,

Azita Yazdani, P.E.

Founder and CEO

Exergy Systems, Inc.

Main: 949-709-7800

Mobile: 949-279-2216

Fax: 650-889-5384

Follow me on Twitter: [@cleantechfemme](#)

LinkedIn: [AzitaYazdani](#)

www.exergycorp.com

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