



January 6, 2016

To: Kathy Frevert, State Water Resources Control Board
From: Alyssa Go, Edison Water Resources
Subject: Comments on Proposed Regulatory Framework

Edison Water Resources (EWR) appreciates the opportunity to comment on the State Water Resources Control Boards (SWRCB's) Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation, issued December 21, 2015. EWR, a subsidiary of Edison International Inc., delivers reliable, sustainable, and drought-proof sources of water at competitive prices. EWR focuses on developing small, distributed resources using environmentally-sensitive technologies with low carbon footprints, and sees these resources as playing a key role in California's long-term, sustainable water plan.

EWR generally supports the extension of the Emergency Regulations, including the Staff recommendation to "[p]rovide a one-tier (four percentage point) reduction to the conservation standard of urban water suppliers using new drought resilient water supplies."¹ However, the recommendation states that the reduction would be allowed for urban water suppliers who use desalinated seawater or indirect potable reuse of coastal wastewater for least four percent of their potable water supply. EWR finds that by specifying "seawater" in particular, this definition of "new drought resilient water supplies" excludes brackish water desalination. Brackish water desalination not only has the potential to provide drought-resilient sources of potable water to urban areas, but also can provide these resources with lower greenhouse gas emissions as compared to seawater desalination. Thus, brackish water desalination both aligns with the SWRCB's water conservation objectives, as well as other state goals related to water and energy sustainability.

Thus, EWR recommends the SWRCB's final regulations allow urban water suppliers to meet their conservation targets through not only seawater desalination, but also through brackish water desalination.

¹ Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation, p. 4.