

## commentletters

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**From:** Doug Hosking <doug1@sonic.net>  
**Sent:** Wednesday, July 01, 2015 10:56 AM  
**To:** commentletters  
**Subject:** Comment Letter: Conservation Pricing



I appreciate the need to encourage further water conservation, but hope any adopted policies re tiered prices will consider that simplistic implementations can lead to unfair consequences.

Consider for example, an HOA served by 2 water meters. One serves half of the homes plus common area irrigation for all units, a pool and a clubhouse. The other serves the remaining half of the units but serves no common area irrigation. In the drought of the early 1990s, our HOA consistently hit the situation where, because all common area irrigation was on one meter, the conservation was unevenly split across meters. This caused us to be “over quota” on one meter but under quota on the other meter. We would get hit with surcharges, then have to appeal each month for manual adjustments, because our total water usage was under quota.

Clearly it’s not fair for billing differences to be based solely on details of which pipes connect where within a complex. Whatever conservation pricing policies may be adopted need to recognize this. Providing the option of automatically aggregating usage for a complex before applying pricing tiers would be an obvious solution, requiring a one-time programming upgrade rather than recurring manual effort to make billing adjustments.

I would welcome any changes you could make that would make it more practical for HOAs to install per-unit water submeters where they do not currently exist. Current law makes this prohibitively expensive in many cases, not only for initial installation but also due to requirements for periodic submeter accuracy certification. Today’s “smart meter” technology could presumably be very effectively used for accurate and efficient billing, plus provide the benefit of early detection of hidden leaks. This would help HOA boards and apartment managers hold individual unit residents more accountable for conservation. Currently, they have very little power in that regard in many cases.