

April 13, 2015

State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100  
jessica.bean@waterboards.ca.gov



Re: Comments on Draft Proposed Regulatory Framework for Executive Order

Dear State Water Resources Control Board:

The comments below reflect concerns over new reporting requirements and compliance assessment for the CII sectors.

1. Reporting Requirements for CII Sector

Water retailers do not have the same sales categories for CII. For example, not all retailers have an institutional category. And for agencies that do have an institutional sales category, the definition of institutional customers can differ from agency to agency. Consider simplifying your reporting requirements by allowing CII to be combined. Also, please consider that monthly reporting of sales or consumption does not provide the State Board with an accurate accounting of demand by sector, if the retailer bills bi-monthly. The State Board might want to consider a running average for demand.

2. CII Water Savings Goals under Directive 5 of Executive Order

Please provide clarity on goals for CII water savings. Will it be different from residential? Is your expectation that CII water savings will mostly be the result of reducing irrigation demand? If you are targeting specific sectors, such as golf courses and cemeteries, please be specific on their water savings goals.

Thank you for considering the above comments.

A handwritten signature in blue ink that reads "Cathleen Brennan".

Cathleen Brennan  
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