



CALIFORNIA WATER SERVICE

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April 13, 2015

Ms. Jessica Bean
California State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

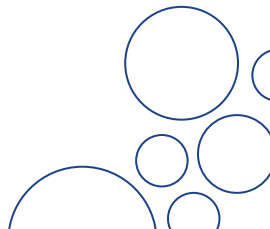
RE: Mandatory Conservation Proposed Regulatory Framework

Dear Ms. Bean:

California Water Service (Cal Water) provides water utility service to about two million Californians through approximately 500,000 service connections. Our service areas span the state, from Chico in the north to the Palos Verdes Peninsula in the south.

At the outset, we want to commend the State Water Resources Control Board (Board) for acting so quickly in response to Governor Brown's Executive Order mandating a 25% statewide reduction in potable urban water use. Cal Water believes that the draft regulatory framework released by the Board is an effective first step at crafting a set of regulations to comply with the Governor's Executive Order. We submit the following comments in the hopes of assisting the Board finalize those regulations.

1. Service areas with an R-GPCD calculation at or below 55 should not be required to achieve further reductions in water use. Cal Water is concerned that asking customers in these service areas to further reduce their usage could result in various health, safety, and sanitation concerns.
2. The Board should require all utilities to limit outdoor irrigation to no more than two days per week, unless the customer's utility has verified that the customer has installed a smart irrigation timer and/or high-efficiency sprinkler nozzles, in which case they will be able to irrigate three days per week. Based on our discussions with a number of water utilities and city officials across the state, we believe that many Californians are confused about which days outdoor irrigation is allowed. Similarly, many residents seem to be frustrated when they live in a service area that has very strict irrigation schedules but their friends and





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neighbors are served by a utility with less strict restrictions. Mandating that all outdoor irrigation across the state be limited to two days per week and specifying what those days are will create a consistency of message from one utility to the next, maximizing the effectiveness of conservation advertising and reducing the enforcement burden of those restrictions.

3. Regarding the new reporting requirements being considered, we do not believe the Board should require reporting on specific customers (i.e. golf courses, amusement parks, cemeteries, and college campuses). This level of reporting would be incredibly difficult to implement because our customer records system does not always alert us to the fact that, for instance, a customer is a golf course or that the customer has a "large landscape." In addition, requiring this level of reporting could cause utilities to violate their customers' privacy. For instance, if there only happens to be one golf course in a relatively small service area, the utility would be forced into a situation where it had to disclose the usage information of that lone, easily identifiable customer.
4. Regarding the proposed conservation tiers, we encourage the Board to consider taking into account the various climatic conditions that results in higher water use in various parts of the state, such as the Central Valley. Taking these factors into account will help to ensure that the Board's final regulations are equitable.
5. Regarding compliance assessments, we suggest that the Board continue to track monthly demand and production, but base compliance on a cumulative basis as of February 28, 2016. Relying on cumulative savings to measure compliance gives customers additional flexibility in meeting conservation targets by allowing their utilities to use innovative strategies such as banking from month-to-month.

We truly appreciate the opportunity to present to the Board our thoughts on its draft framework and look forward to reviewing the draft regulations in the coming days.

Respectfully,

A handwritten signature in black ink, appearing to read "Justin Skarb". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Justin Skarb

Government & Community Relations Manager

