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April 22, 2015

Ms. Jessica Bean
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-0100

Dear Ms. Bean:

Subject: Comments on the State Water Resources Control Board (SWRCB)
Draft Emergency Regulations for Urban Water Conservation

Thank you for the opportunity to comment on the Draft Emergency Regulations for Urban Water Conservation (Emergency Regulations). The Los Angeles Department of Water and Power (LADWP) appreciates SWRCB's commitment to collaborating with California water suppliers in drafting its Emergency Regulations. Through working together as a team, LADWP sees that the resulting draft Emergency Regulations has addressed water suppliers' concerns while setting an effective strategy to meet the Governor's call for 25 percent conservation.

In relation to the new Emergency Regulations proposed, LADWP would like to submit the following comments for the SWRCB's consideration:

Urban Water Suppliers: Tier Structure

LADWP appreciates SWRCB's use of residential gallons per capita per day for the months of July 2014 thru September 2014 to establish conservation tiers for water suppliers. Although the use of only three months does not address weather normalization, it is an improvement from using only September 2014. This multi-month approach helps to account for significant weather differences between California regions during this time and improves the approach to setting tiers.

Furthermore, LADWP supports SWRCB's increase in the number of conservation tiers. The measurement and analysis of water conservation can be complex, but these additional tiers better apportion water suppliers' past conservation efforts. LADWP has been a leader in conservation for decades. As a result of our

conservation efforts, Los Angeles has kept its water demand levels flat for the last 45 years despite a population increase of over one million people. LADWP appreciates the conservation recognition that this methodology gives.

Urban Water Suppliers: Compliance Assessment

LADWP appreciates that SWRCB has decided to assess compliance based on a cumulative basis. Monthly water usage can fluctuate significantly with varying temperature and precipitation levels, and LADWP agrees that analyzing on a cumulative basis will better account for these impacts.

However, LADWP would like to offer the following recommendations to SWRCB in its evaluation of cumulative water savings:

- Allow for implementation time for the tools provided by the Governor's Executive Order to assist water suppliers in meeting their conservation targets, such as:
 - Department of Water Resources funding to reach 50 million square feet of turf removal.
 - California Energy Commission and Department of Water Resources joint water conservation rebate program.
 - Guidelines to implement prohibitions on outdoor watering for street median and newly constructed home.
- Allow for adequate time to gather enough monthly data points for a reliable running cumulative total. Lack of sufficient data points will result in the same temperature and precipitation impacts as monthly assessment.

Urban Water Suppliers: New Reporting Requirements

LADWP appreciates the need for SWRCB to assess compliance with commercial, industrial, and institutional (CII) reductions in water usage. However, separating out water use for the three sectors will require a longer timeline to gather necessary data. Considering SWRCB is looking for total reduction in the CII sector, LADWP recommends that SWRCB require only total CII usage be reported to decrease the data gathering burden on water suppliers.

Once again, thank you for the opportunity to comment. If you have any questions or require additional information, please contact Ms. Penny M. Falcon, Manager of

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Conservation Policy, Legislation and Grants, at (213) 367-4647 or by e-mail at penny.falcon@ladwp.com.

Sincerely,



Martin L. Adams

SM:vf
By e-mail
c: Ms. Penny M. Falcon