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MEMBER AGENCY OF THE
METROPOLITAN WATER
DISTRICT
OF SOUTHERN CALIFORNIA

(7/8/15) Public Workshop
Conservation Pricing
Deadline: 7/1/15 by 12:00 noon



June 29, 2015

Felicia Marcus
Chair, State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

RE: Conservation Water Pricing

Dear Chair Marcus and Honorable Board Members:

Las Virgenes Municipal Water District (LVMWD) respectfully asks that the comments herein be included as the State Water Board considers Conservation Water Pricing and Implementation of Directive 8 of Executive Order B-29-15.

- LVMWD believes rate structures and conservation pricing models should be left to the discretion of local water agencies. Through their elected boards of directors and staff engagement with the public, agencies are in the best position to be responsible and accountable to the customers they serve.
- LVMWD asks the State Water Board to consider that taking a "one size fits all" approach to rate structures and rate setting does not recognize inherent local or regional differences that exist. Each agency has unique characteristics that require consideration at the "grass roots" level. A basic example would be the contrast between a highly urbanized region with multi-family dwellings and a semi-rural area where larger properties and the presence of equestrians or other large animals yield greatly different gallons per capita per day (GPCD) calculations.
- It is requested that the State Water Board continue its support for the "Water Budget" approach that some agencies have implemented to help customers monitor and adjust their water use on an ongoing basis. While this method may not be suitable for all agencies, the State Board's recognition of it as an effective and fully sanctioned system that promotes conservation would be a positive statement to the general public and to water utilities that may be considering converting to this technique that views indoor use, outdoor use and additional special needs as discrete components.

LVMWD appreciates the opportunity to comment on this matter.

Sincerely,

David W. Pedersen, P.E.
General Manager