

Comment 1: We need more time to respond to these issues. The Board is moving far too fast for thoughtful commenting.

Additional comments:

**I Apportioning Water Supplier Reductions:**

Currently there is no justifiable methodology / basis for the cut-offs presented in the table. Using a 55 gallon per capita scaling value has a basis in ??? What analyses? This approach neglects the difficulty of conservation hardening. A 20% reduction at 110 gpcd is much harder than a 25% reduction at 165 gpcd. In addition, a single, arbitrarily determined, month - September 2014 - is a very weak basis for significant water reductions or for assigning a water purveyor to a specific reduction target. Reporting for July and August and October can be developed for a more robust measure and any measure should include winter 'base' usage.

**II New Reporting Requirements:**

The proposed new reporting values do not accurately reflect our existing customer class designation and will require account / customer investigation that will take time to undertake. Are we expected to re-structure our accounting methods to meet the new customer classes as designated in the Order?

Also we have a significant agricultural customer class that skews some of our reporting – how are we to accommodate for these customers? We have been told that as an “Urban Retail Water Supplier” we must require conservation from these customers – how are we to account for this in the reporting tool? Given the Governor’s emergency declaration and the lack of required agricultural conservation, it seems like our agricultural customers are being held to more stringent requirements than other, comparable agricultural areas.

**III. Compliance Assessment:**

We maintain that using a single month from an arbitrarily determined year – 2013 - is problematic with respect to reduction measures. Cumulative assessment is a good step.

**IV. Enforcement:**

Are these tools meant to be directed to water retailers that fail to achieve their % reduction? Fiscal penalties for smaller water agencies will not produce the desired effect.

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