

Please find attached the response from Sunnyvale. I am the Director of Environmental Services for Sunnyvale, and Deanna Santana is the City Manager.

If you have any questions, please feel free contact me. (John Stufflebean 408-807-9824)

To Jessica Bean

Jessica.Bean@waterboards.ca.gov

April 9, 2015

Sent via email

Thank for the opportunity to comment on the Mandatory Conservation Proposed Regulatory Framework. The City of Sunnyvale has the following comments:

- I. **Apportioning Water Supplier Reduction:** Sunnyvale concurs that September 2015 R-GPDC data can serve as the basis for placement of the urban water suppliers in the various Percentage Standards. However, we suggest expanding the R-GCD Ranges as follows:

R-GPCD (Sept 2014)	# of Suppliers within Range	Conservation Standard
Under 55	18	10%
55-80	43	15%
80-110	83	20%
110-165	132	25%
Over 165	135	30%

This allows for a more equitable distribution of the percentage reduction, while maintaining the ability to achieve the state-wide 25% reduction goal.

An ideal solution would be an equation that specifies conservation as a function of water use so there are no breakpoints. For example:

$$\text{Conservation goal (in percent)} = 5 + 0.12 \times \text{Current water use (in r-gpcd)}$$

- II. **New Reporting Requirements:** We agree with the monthly reporting requirements as proposed, however the city of Sunnyvale would like to combine the reporting of the Commercial and Industrial Sectors, as these two customer classes are not differentiated in the billing system.
- IV. **Enforcement:** We would like clarification on who will be providing enforcement to water customers of private water companies within a city limit. For example Cal Water has customers within Sunnyvale, will Cal Water under the proposed regulations have the ability to enforce these regulations and issue fines or citations?

We recognize that the agriculture industry is not covered under the Governor's Executive Order, however we would like to see the State fund new technology and provide irrigation best management practices to water can be used more efficiently in such applications.