



July 14, 2014

Via Electronic and U.S. Mail

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
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commentletters@waterboards.ca.gov

Re: Drought-Related Emergency Water Conservation Regulations

Dear Ms. Townsend:

California Water Association ("CWA"), a statewide association representing the interests of investor-owned water utilities subject to the jurisdiction of the California Public Utilities Commission ("CPUC"), submits the following comments on Agenda Item 10 on the State Water Resource Control Board's July 15-16, 2014 Agenda, regarding "Consideration of a proposed Resolution for drought-related Emergency Regulations pertaining to urban conservation."

In the course of responding to recurrent droughts in California, particularly over the past 35 years, the CPUC has worked with the investor-owned water utilities to develop a set of graduated procedures to impose increasingly stringent restrictions on the use of water by utility customers in times of drought. These efforts have evolved into procedures that are articulated in the investor-owned utilities' Tariff Rule 14.1 and Schedule 14.1, which together constitute the regulated water utilities' immediate drought response actions. They prescribe steps to be taken to implement voluntary and mandatory conservation measures, in response to drought conditions of varying levels of severity.

All CPUC-regulated Class A and Class B water utilities (those serving 2,000 or more customers in California), are subject to the conservation directives of Rule 14.1, even for service districts with fewer than 2,000 customers. Regardless of the size of their districts, these Class A and B water utilities, which collectively serve nearly 6 million Californians, have activated Rule 14.1, and this Rule is now in effect for all of them.



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The Class A and Class B water companies have notified all of their customers of the applicable water conservation directives, and the companies' conservation partnerships with their customers have resulted in significant declines in water consumption. Many of their customers are responding to the Governor's call for 20 percent voluntary conservation, and the companies are well along in compliance with the reduction in per capita consumption mandated by the 2009 20% by 2020 legislation.

CWA commends the State Board on its vigorous response to Governor Edmund G. Brown Jr.'s drought emergency proclamation of January 17 and Executive Order of April 25. Pursuant to an order from the CPUC, the applicable CWA members are all operating in compliance with the Governor's proclamation and Executive Order. Specifically, the CPUC ordered comparable drought response requirements for its jurisdictional water utilities, as specified in CPUC Resolution W-4978, adopted February 27, 2014.

This resolution adopted drought management procedures for water conservation, rationing and service connection moratoria. CWA agrees with the State Board that the current drought calls for increased water conservation efforts, but cautions that punitive actions should not be taken without considering the extent to which prior efforts have already achieved significant water reduction goals – especially for those utilities whose customers are already below 100 gallons per capita per day.

Looking forward, CWA's member utilities will continue to work with the CPUC to coordinate their existing drought response plans and programs with the State Board's new regulations, including the data collection requirements. With respect to the latter, CWA looks forward to reviewing the SWRCB-developed forms so that it can evaluate the impact of the reporting requirements.

CWA appreciates the opportunity to provide input regarding the State Board's proposed emergency water conservation regulations.

Very truly yours,



Jack Hawks

cc: Honorable Catherine J.K. Sandoval; Commissioner – California Public Utilities Commission
Rami S. Kahlon; Director, CPUC Division of Water and Audits
Bruce DeBerry; Program Manager, CPUC Division of Water and Audits
California Water Association Executive Committee