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March 8, 2017

VIA EMAIL; commentletters@waterboards.ca.gov

The Honorable Felicia Marcus, Chair
State Water Resources Control Board
c/o Clerk to the Board – State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Comment Letter – Comments on Low-Income Rate Assistance Program

Dear Chair Marcus:

Jurupa Community Services District (JCSD) appreciates the opportunity to provide comments on the State's Low-Income Rate Assistance Program. JCSD has provided safe and reliable water to its residents for more than 50 years. The population of our service area is over 118,000 and spans the Cities of Eastvale and Jurupa Valley. The demographic of JCSD ranges from affluent households to those that struggle to afford basic necessities including rent, utilities, healthcare, and food. Approximately 28 percent of our service area is considered a Disadvantaged Community (DAC) as defined by the State's screening methodology: CalEnviroScreen 2.0. As such, we agree that assistance should be provided to those households in need of basic services like water.

JCSD respectfully requests the following items be considered in any Low-Income Rate Assistance Program.

- Prop 218 – Prop 218 requires fees be proportionate to the cost of service to provide water. This presents a challenge in funding any low-income program with rate revenue. A modification that addresses this concern would enable JCSD to meet the needs of low-income households and stay within the law.
- Program Administration – JCSD does not have staff to determine eligibility or manage a program. Instead, JCSD requests a program where eligibility is based on private utility low-income programs or specific government programs like Medi-Cal. Southern California Edison and Southern California Gas Company have successful low-income models that could be used as examples.

- Account Type – JCSD believes only residential and multi-family accounts should qualify for rate assistance.
- Fixed Charge Reduction – Low-income customers typically use very little water and volumetric charges vary due to many factors including account type (multi-family, single family, etc.), season, etc. Consequently, to make a program that is meaningful for low-income residents, the fixed charge should be the target of the program. A reduced fixed charge would assist in budget forecasting and accounting, be easier to understand for customers, and not discourage water conservation.
- Public Goods Charge – JCSD contends that a public goods charge (PGC) is not an effective way to resolve water affordability. A PGC would raise the cost of water for all users and exacerbate water costs for low-income households.

We support the State Board's commitment to addressing the water affordability issue in California. A safe, reliable, affordable water supply is critical to our residents, the environment, and our economy.

Sincerely,



Todd M. Corbin
General Manager