



March 1, 2017

State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Dear Board Members:

Our most recent and extensive drought has made clear that we are at the limit of present supply capability. But throughout this drought, and every previous drought, when it was clear the water supplies were inadequate for the existing homes and businesses, the addition of new customers never lessened. Every new customer connected to an inadequate supply system erodes service to the existing customers.

Any proposal to impose water restrictions at the first sign of drought is hypocritical if new water demands have continued to be added in previous years when system limits were well known. Restrictions clearly harm existing users, but also impact new customers who may unknowingly connect to a limited source of supply. When consumers connect to an existing water system they establish a contract with their supplier, an understanding that there are adequate supplies to meet the consumer's demands. Disruptions or reductions in service as a result of natural events are not the responsibility of the supplier. But if the water supplier has a history of imposing water restrictions during drought periods and continues to add new consumer demands then the water supplier is responsible for adverse impacts to their existing customers and misleading their new customers. It hardly seems fair that the consumers would be penalized, and endure water restrictions, because the water suppliers have imprudently expanded their systems beyond their capabilities.

Current policies seem to favor new development over existing water users. Once families were encouraged to grow their own vegetable gardens but now their water use is a target that can be squeezed to redirect water to supply new development. Our past conservation efforts have been compromised by the addition of new demand. Our conservation efforts have facilitated new development but have not reduced our risk of future water shortages, and more extensive water restrictions become necessary when future droughts occur.

The SWRCB should be adopting sustainable policies which protect the rights of consumers. The present policies do not protect existing customers or future customers. The SWRCB ought to require all water retailers to demonstrate that there will be no adverse impact to their existing customers during an extreme drought, before they connect new customers. The state should establish an acceptable level of risk for water retailers. No new demands could be added until the retailers demonstrate they can meet this standard with the added demand. Without defining and maintaining a level of service new customers connecting to a compromised system receive less than expected level of service.

Sincerely,

A handwritten signature in blue ink that reads "Randy Talley". The signature is fluid and cursive.

Randy Talley
158 Alice Ave.
Campbell, CA 95008

Cc: California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102