



CALIFORNIA WATER SERVICE

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March 17, 2017

Public Comment
2016 Bay-Delta Plan Amendment & SED
Deadline: 3/17/17 12:00 noon

The Honorable Felicia Marcus, Chair
The Honorable Tam Doduc, Hearing Officer
Ms. Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Re: Comments on the 2016 Bay Delta Plan Amendment & SED

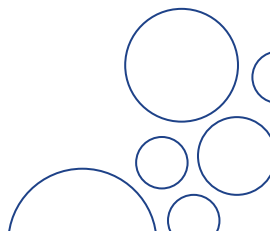
Dear Chair Marcus & Board Member Doduc:

As you know, California Water Service (Cal Water) is the largest water utility regulated by the California Public Utilities Commission (Commission). We serve approximately 2 million Californians through 500,000 individual service connections. Our service areas span the state, from Chico in the north to the Palos Verdes Peninsula in the south.

Cal Water sincerely appreciates the time and effort the State Water Resources Control Board (Board) has put into not only preparing the Substitute Environmental Document in Support of Potential Changes to the Water Quality Control Plan for the Bay-Delta (SED), but also undertaking an extensive public outreach effort related to the SED. Further, Cal Water understands the need to protect the water quality of the Sacramento-San Joaquin Bay Delta, and we recognize the importance of reliable, high-quality water to the state's health and economy.

Across our service areas, we rely on a combination of surface water and groundwater to provide safe, reliable, and high-quality service to our customers. As both a purchaser of wholesale water from various suppliers and a water rights holder, Cal Water has interests in areas of origin, exports from the Delta, and locally derived supplies. For example, Cal Water relies on locally derived supplies to provide water to about 257,000 customers in our Bayshore and Bear Gulch service areas, which are in the San Francisco Bay Area. Because of certain restrictions under federal law, a reduction in water supply to the Hetch Hetchy water system could significantly impact our ability to serve these customers.

As is the case with many water utilities, Cal Water is reliant, in many of our service areas, on the supplies made available by local wholesale agencies. For example, we utilize significant amounts of water from our wholesale partners to serve approximately 171,000 people who live





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in and around the City of Stockton. In those areas where we are unable to rely on groundwater to supplement the water we receive from local wholesalers, any water supply shortages will directly impact our customers. This is also true in service areas where the future use of local groundwater supplies may be limited by rules and regulations established pursuant to the Sustainable Groundwater Management Act.

You are aware of the concerns addressed by many wholesalers that the proposed changes to the Bay-Delta Water Quality Control Plan would have devastating effects on their ability to meet customer demands and that the SED has some scientific infirmities. Our wholesale partners share these concerns. Given our reliance on wholesale supplies, we urge you to continue to work toward a solution that will not ultimately harm the customers we are committed to serving.

We truly appreciate the Board making the decision to provide a two-month extension to the 120-day public comment period on the SED. With negotiations regarding a potential solution ongoing and in light of the seriousness of the potential negative consequences of the proposal laid out in the SED, Cal Water respectfully requests that the Board consider further extending the comment period. It is our hope that this additional time will increase the likelihood of negotiating parties reaching a sustainable and equitable solution.

Cal Water stands ready to work with the Board, parties to the negotiations, and others to reach such a solution. If there is anything we can do to assist you or if you have any questions, please do not hesitate to get in touch with us.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Kuta", written over a light blue circular background.

Robert Kuta
Vice President, Engineering

Cc: Mr. Scot Moody, General Manager, Stockton East Water District
Mr. Harlan Kelly, General Manager, San Francisco Public Utilities Commission
Ms. Nicole Sandkulla, CEO, Bay Area Water Supply & Conservation Agency
Mr. Rami Kahlon, Director, Water Division, California Public Utilities Commission

