

January 6, 2016

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

Dear Ms. Frevert:

The SFPUC, the owner and operator of the Hetch Hetchy Regional Water System, generally supports the SWRCB's December 21<sup>st</sup> Framework for Extended Emergency Regulation for Urban Water Conservation. Thank you for your efforts to work with the water community on these regulations. We do, however, want to ensure that implementation of the revised framework will not re-distribute impacts onto other water suppliers, and ask you to consider an alternative metric for population growth.

The framework is silent on whether credits given to qualifying water suppliers would impact other suppliers' targets in order to achieve an overall 25% statewide savings. We believe that those cities with very low per capita consumption, such as San Francisco and the majority of our Wholesale Customers, should not be penalized for our strong conservation record to date by having to shoulder a larger burden in mandatory reductions. We respectfully request that the SWRCB clarify its intention to avoid re-distributing impacts onto other water suppliers through implementation of the revised regulations.

Additionally, the current proposal to use additional water service connections as the metric for determining a city's population growth will not work adequately for dense urban environments. Since the majority of San Francisco's growth is through infill or brownfield development that is not sub-metered, a 13-story residential high-rise can be serviced by the same single water connection that used to service a far smaller facility. We propose that the SWRCB include an alternative metric that could be used for infill development, for instance population growth data from a respected third party, such as the California Department of Finance.

We support the SWRCB's efforts to respond to the drought throughout the State, and we look forward to working with you to implement these regulations.

Sincerely,



Steven R. Ritchie  
Assistant General Manager, Water

Edwin M. Lee  
Mayor

Francesca Victor  
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Vice President

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Commissioner

Vince Courtney  
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