

Dear Ms. Bean,

I submit the following comments in response to your invitation for feedback on the Mandatory Conservation Proposed Regulatory Framework.

The proposed apportionment of water supplier reductions is inherently unjust, as it is most onerous for water suppliers and communities that have already been most effective in achieving the water conservation goals that the State has been pursuing for the past 20+ years. I particularly draw your attention to the following points:

- If the State is now going to mandate reductions for water suppliers, the suppliers that are to be the target of the reductions should be confined to those who have not already achieved the desired per capita usage goals.
- While the proposal for calls for a higher percentage conservation standard for communities in higher a R-GPCD Range, it fails to recognize the law of diminishing returns as it applies to incremental available/potential conservation savings among water suppliers that have fully deployed efforts and resources. Therefore, the focus should be on the suppliers in the two upper R-GPCD Ranges who have not reached the 110 GPD threshold and regulate them toward that goal. There should be no incremental efforts demanded of those that have already reached the 110 GPD threshold.
- Penalizing water suppliers that have already met the State's previously-stated water conservation goals, while allowing the suppliers who have not to remain above the goal, is inherently unjust. If all had met the threshold, there would be no need for further conservation measures at this time. Instead, those suppliers that have not met the threshold are allowed to continue to not meet the threshold, with the worst offenders being allowed the most tolerance, while those who have complied are being required to make greater (and more demanding) sacrifices.

Respectfully,

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