



San Francisco Water Power Sewer

Operator of the Hetch Hetchy Regional Water System

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April 13, 2015

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

**Subject: SFPUC Comments on State Water Resources Control Board
Mandatory Conservation Proposed Regulatory Framework**

Dear Ms. Bean:

The SFPUC, the owner and operator of the Hetch Hetchy Regional Water System, supports the Governor’s recent efforts to reduce water use throughout the State of California. The SFPUC has the following comments on the State Water Resources Control Board’s *Mandatory Conservation Proposed Regulatory Framework* that sets out to achieve the Governor’s directive of 25 % urban water use reduction.

Apportioning Water Supplier Reductions – The SFPUC supports a tiered approach to achieving the Governor’s Executive Order directive of 25% reduction in the State’s urban water use. We believe a tiered approach is necessary to ensure that those urban water suppliers with already highly efficient water use in their service area are not required to ask their customers to sacrifice standard public health and sanitation needs. In San Francisco, over the reporting period of September 2014 – February 2015, residents have brought their water use down to 43.9 gallons per capita per day. We believe a conservation standard of 10% reduction in water use over 2013 is appropriate for San Francisco. We are also supportive of the tiered allocation proposal being put forth by the Bay Area Water Supply and Conservation Agency, the organization that represents our 26 wholesale customers.

New Reporting Requirements – The SFPUC encourages the SWRCB to allow Commercial, Industrial and Institutional sector use to be reported as a total usage rather than separated out by customer class. We believe that total usage values will still achieve the SWRCB’s goal without causing significant challenges for water suppliers to extract data from their billing systems in a prescriptive and difficult manner.

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Compliance Assessment – The SFPUC supports assessing compliance over the entire reduction period using water production data. The SFPUC does not believe that compliance should be assessed on a month to month basis using 2013 because of differences in water meter reading periods; factors affecting water use in 2013 versus the regulatory period that may have resulted in highly varied use for a particular month, such as weather conditions, fire suppression activities, main breaks, etc.; and other types of abnormalities that will exist between the base year and the reporting period. If the State Board needs to consider compliance at more frequent intervals, the SFPUC would support a quarterly assessment period.

Enforcement – The SFPUC supports informal enforcement. The SFPUC is supportive of Informational Orders and Conservation Orders for urban water suppliers that are egregiously behind in achieving their reduction targets. The SFPUC believes that the SWRCB should consider how far behind the water supplier is in relation to their target when considering enforcement actions. An urban water supplier that is within 1 or 2 percent of their target should not be treated the same as an urban water supplier that is 5-10 percent or greater from their target.

We appreciate the opportunity to provide these comments and sincerely thank the SWRCB for their efforts. I can be reached at (415) 934-5736 or by email at sritchie@sflower.org.

Yours Truly,



Steven R. Ritchie

Assistant General Manager, Water

cc: Nicole Sandkulla, BAWSCA