



## NEWHALL COUNTY WATER DISTRICT

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April 22, 2015

Jessica Bean, Engineering Geologist  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> floor  
Sacramento, CA 95814

Attn: Jessica Bean  
*Via Email Only*

**Subject:** Comment Letter 3 – Mandatory Conservation Achieving a 25% Statewide  
Reduction in Potable Urban Water Use Fact Sheet

Dear Ms. Bean:

The Newhall County Water District (NCWD) appreciates the opportunity to provide additional comments on the State Water Resources Control Board (State Water Board) most recent Mandatory Conservation Fact Sheet dated April 18, 2015. NCWD emailed a comment letter yesterday. However, after participating in the online conference call yesterday with State Water Board staff, we would like to offer up some additional comments.

1. We are requesting the State Board include the following language in the pending regulations under Section 865 (d) (3):

***Urban water suppliers participating in a regional conservation program consisting of two or more urban water suppliers may submit for Board approval a request to establish a regional compliance target that achieves the same level of water reduction as required for each individual urban water supplier.***

2. NCWD and many other water suppliers have commented on the confusion behind the R-GPCD calculation. Our primary concern has to do with the change in the formula. On April 8, 2015 your DRINC Portal displayed the R-GPCD formula which included the subtraction of “non-revenue” water (see below). When we began uploading our corrected data on April 14, 2015 “non-revenue” water was removed from the formula. We believe a number of utilities have reported their respective R-GPCD using the “old” formula which creates inconsistencies with the data and respective Tiers.


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Applications > [Urban Water R-GPCD](#)

Residential gallons-per-capita-day (R-GPCD) is calculated using the formula below from monthly Monitoring Reports submitted by urban water suppliers as required under emergency regulation.

$$\frac{\text{Monthly Water (Production - Non-revenue)} * \text{Percentage Residential Use}}{(\text{Population}) * (\text{Days in Month})}$$

R-GPCD figures are compared with the 2013 baseline year's usage for the same period, the monthly average for the supplier's hydrological region, and the statewide average. Only suppliers with a calculated R-GPCD between 25 and 1000 are used in calculation of averages. For questions on this application, please contact the [DRINC Portal Administrator](#).

**Save Our WATER** 

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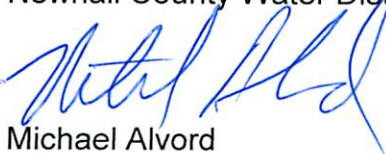
The California Flow Plan Open Records Act

Wednesday, Apr 08, 2015 07:57 AM

***NCWD requests the State Water Board to clarify which formula the water suppliers should be using and for a recollection of all data using the same formula.***

NCWD looks forward to continuing to work with the State Water Board on the development of these conservation regulations.

Sincerely,  
Newhall County Water District



Michael Alvord  
Director of Operations