



July 18, 2016

Honorable Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Aclara Technologies Comments regarding Revised Greenhouse Gas Quantification Methodology for the Department of Water Resources Water-Energy Grant Program

Dear Chairwoman Nichols:

Aclara Technologies LLC, the leading provider of smart water infrastructure technologies, has requested that I provide these comments regarding the Revised Draft of the Greenhouse Gas Quantification Methodology for the Department of Water Resources Water-Energy Grant Program (“Methodology”), dated July 5, 2016. Aclara previously submitted comments to the Investment Plan in November of 2015 supporting a more technology-neutral approach that would allow urban water suppliers and agencies like the Department of Water Resources (“DWR”) more flexibility to deploy technologies and strategies that most effectively achieve water and energy efficiencies and reduce greenhouse gas emissions.

Cognizant that the intent of DWR’s current solicitation is focused on select commercial (and now) residential appliances, Aclara is concerned that the revised language in the calculation methodology examines only direct, on-site savings, failing to consider the indirect energy savings associated with some water conservation measures. We understand the agency’s position that indirect benefits should not be a primary justification for program eligibility. However, we believe that technologies that demonstrably save water, reduce leaks, and reduce greenhouse gas emissions should be eligible, and that if these technologies provide ancillary benefits consistent with California’s long-term environmental goals there should be room to also account for those carbon-reduction benefits.



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Advanced metering infrastructure (“AMI”) directly saves water and energy and achieves greenhouse gas emission savings through water conservation and leak detection. The use of AMI also generates other savings relative to older “drive-by” metering technologies by eliminating the need to roll trucks to collect customer water usage data. The use of trucks to collect usage data across water agency service territories translates in hundreds of thousands of vehicle miles travelled each year for purposes of data collection – a function that AMI has now rendered obsolete. Other utility tasks that now require truck rolls, including the collection of move-in/move-out reads and the resolution of high bill complaints, can also be handled by utility staff with access to the AMI hourly read data.

Absent a mechanism in the calculator to accommodate such benefits, it is conceivable that older technologies that require truck rolls to collect data will be treated no differently than newer technologies that have a much lower carbon footprint. California would thus forfeit opportunities to realize additional carbon emission reductions that could be obtained at low marginal cost. We urge adoption of a more flexible approach that allows applicants to demonstrate the full range of reductions that result from adoption of a particular strategy.

On behalf of Aclara, we appreciate CARB’s consideration of these comments.

Sincerely,

/s/

Jim Hawley
Principal
Dewey Square Group, LLC