

From: [Lau, Fan](#)
To: [DWR Water Use Efficiency](#)
Cc: ["Nicole Sandkulla" \(NSandkulla@bawsca.org\)](#); [Ritchie, Steve](#)
Subject: SFPUC comments on WSCP framework
Date: Friday, September 16, 2016 11:56:17 AM
Attachments: [SFPUC comment letter re WSCP framework_091516.pdf](#)

To Mr. Kent Frame:

Please find attached a comment letter from the San Francisco Public Utilities Commission regarding the Water Shortage Contingency Planning framework that is being developed per Executive Order B-37-16. The original hard copy will also be mailed to you.

Fan Lau, P.E.
Water Resources Division

San Francisco Public Utilities Commission
525 Golden Gate Ave., 10th Floor | San Francisco, CA 94102
(415) 554-2498 | FLau@sfgwater.org



September 15, 2016

Via Electronic and U.S. Mail

Kent Frame
 Water Use and Efficiency Branch
 California Department of Water Resources
 P.O. Box 942836
 Sacramento, CA 94236-0001
WUE@water.ca.gov

Dear Mr. Frame:

The San Francisco Public Utilities Commission (SFPUC) has been closely following the development of the Long-Term Water Use Efficiency Framework in response to the Governor’s Executive Order B-37-16. DWR recently held a public workshop on August 21, 2016 regarding improvements to Water Shortage Contingency Planning (WSCP) and invited comments. We appreciate this opportunity to participate in the WSCP framework process and provide the following comments.

We echo the comments made by our fellow urban water suppliers that the WSCP framework should allow for flexibility since each drought is different and standardized water shortage stages applied statewide may not make sense for each supplier.

We also share concerns expressed by others regarding how State-mandated efficiency objectives that are invoked through WSCP stages would align with short-term conservation standards that may be prompted by the State during drought emergencies.

We do not support a regional approach for establishing efficiency targets and triggers. One set of regional boundaries—whether they are based on municipal jurisdiction, climate, or basin—may not apply to all supply sources within one supplier’s portfolio. It will also be difficult to set regional triggers for regions that have multiple sources of supplies with different drought reliabilities. If water agencies prefer to engage on a regional level, the option should be made available to them, but it should not be mandatory.

The SFPUC already has an established process of reporting annual water supply availability for each upcoming water year to our Commission and wholesale customers. This process is similar to the annual “drought-risk” assessment proposed by DWR. If this process is to be standardized by DWR, we suggest that

Edwin M. Lee
 Mayor
Francesca Viotor
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Anson Moran
 Vice President
Ann Moller Caen
 Commissioner
Vince Courtney
 Commissioner
Ike Kwon
 Commissioner
Harlan L. Kelly, Jr.
 General Manager



the requirements are broad enough to allow agencies with existing annual reporting to not have to develop multiple reports for different audiences. In general, we would support the development of standards rather than prescriptions so that existing protocols can be adaptively used.

The SFPUC has a robust and thorough planning process to ensure adequate supply for our retail and wholesale service areas. These plans and processes are implemented effectively and efficiently. We welcome DWR to meet with us to discuss our plans and processes and how they may be adapted for statewide standards. We are also eager to share our practices and concerns regarding the other Executive Order directives (i.e., water loss, water use targets). We look forward to meeting with you.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Ritchie', with a long horizontal stroke extending to the right.

Steven R. Ritchie
Assistant General Manager, Water

Cc: Nicole Sandkulla, BAWSCA