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October 30, 2013

Peter Brostrom  
Water Use and Efficiency Branch  
California Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236-001

Re: DWR Independent Technical Panel – 2015 UWMP Reporting Requirements and Demand Management Measures Revision

Dear Mr. Brostrom,

Olivenhain Municipal Water District (OMWD) is a public agency in northern San Diego County that provides 80,000 customers with water, wastewater treatment, recycled water, hydroelectricity, and recreational services. OMWD was informed that members of the ITP are working to propose additional reporting requirements that would be included in 2015 Urban Water Management Plans (UWMP). OMWD does not object in principle to revising UWMP reporting requirements; several of the proposed revisions, however, are likely to have unnecessarily burdensome impacts upon reporting agencies and on DWR itself. OMWD would like to express its concerns regarding several of the proposed additions submitted to date.

1) Passive Savings

This recommendation is for data to be calculated using a method developed by DWR. Being that many agencies will realistically begin work on their UWMPs in less than one year from the date of this letter, the process for developing such a methodology will take more time than currently exists before the 2015 UWMP guidelines need to be released.

2) DWR Review of DMMs Proposal

While OMWD agrees with the recommendation to develop standard reporting formats, it does not support increasing DWR's authority to assess the accuracy or validity of the calculations and estimates in UWMPs, or consistency with DWR's technical methodologies and criteria. DWR is already taxed in reviewing the UWMPs and it is not currently uncommon for agencies to wait years for their plans to be reviewed. Burdening DWR with this additional authority all but



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ensures that DWR will find itself unable to review and respond to each reporting agency according to the five-year cycle established in the Urban Water Management Planning Act.

### 3) Landscape Ordinance Proposal

Including reporting criteria for landscape ordinances would be another laborious addition for reporting agencies as many agencies have multiple jurisdictions with separate ordinances. For example, Metropolitan Water District of Southern California would need to review and include over 100 different documents into its UWMP to satisfy these requirements. The ordinances are already available to members of the public and requiring water agencies consolidate the information into their UWMPs is unnecessary.

### 4) UWMP DMM Section Proposal

While OMWD supports bringing the DMMs in line with current California Urban Water Conservation Council (CUWCC) Best Management Practices (BMPs) and developing tools and resources to support agency preparation of the DMM section in the UWMP, the addition of DMMs that include passive savings, retrofit programs and landscape ordinances should not be required of agencies meeting their SB X7-7 targets.

### 5) Embedded Energy

When calculating imbedded energy, there are multiple factors involved that vary from agency to agency. Many agencies are acutely aware of energy costs and work towards reducing their carbon footprint because it makes good economic sense; however, they do not have database systems in place that capture the data necessary to report on the energy intensity of water supply. The time required to develop a methodology to capture such data will not exist prior to the 2015 reporting deadlines.

Further, though the pursuit of energy efficiency is inarguably a noble goal, adding reporting criteria on the energy intensity involved in water supply is outside of the original reporting focus for UWMPs. The addition of reporting requirements pertaining to energy intensity data would also result in new cost burdens for the state, water wholesalers, and water retailers without improving water use efficiency.

As a water provider, our constituents are better served by focusing our efforts on water use efficiency. In the process, energy savings naturally occur.

### 6) Avoided Cost Proposal

Over the past several years, agencies have been forced to do more with less as water sales have decreased, funding sources have been reduced, and agency resources are taxed. Requiring an avoided cost model calculation will not only burden smaller agencies, as acknowledged in the proposal, but it will tax staff at larger agencies as well. OMWD supports the creation of guidelines that will enable agencies to develop and voluntarily report simplified estimates of their avoided cost of water based on a set of system characteristics and regional parameters to be developed as part of the 2015 guidance update with assistance from the CUWCC and California Public Utilities Commission.

7) Details of Main Functioning Components of Water System

Requiring more detail about agency water systems may conflict with Department of Homeland Security recommendations to avoid reference to water system details in plans available to the general public. OMWD is hesitant to provide intricate operational details of its water system in a public document.

8) DMM Straw Proposal

OMWD supports allowing agencies to meet SB X7-7 targets in the most beneficial manner for each individual agency. As a public agency, OMWD must be fiscally responsible while providing safe, reliable water and complying with regulatory requirements. The evolution of CUWCC's prescriptive BMPs toward Flexible and GPCD reporting options has provided greater flexibility and local autonomy by which OMWD is able to utilize its resources in meeting SB X7-7 targets in a manner best suited to its operations and service area. As a result, customer service and outreach has improved while GPCD has been reduced.

We respectfully ask that you reject any of the proposed changes to 2015 UWMP reporting requirements discussed above that would unnecessarily increase burdens upon reporting agencies and on DWR. Thank you for your consideration.

Sincerely,



Kimberly A. Thorner  
General Manager