

From: Falcon, Penny [Penny.Falcon@ladwp.com]
Sent: Friday, April 23, 2010 3:08 PM
To: Water Use Efficiency – Urban eNews
Cc: Gentili, Mark; Pettijohn, David
Subject: SBX7-7 USC Charter & Issue Papers Comments

To Whom It May Concern:

Thank you for this opportunity to comment on the draft USC Charter and Issue Papers; please see my comments below.

1. **Issue Paper 1: Methods and Issues in Determining Gross Water Use** – On page 3 under the heading, “DWR staff understanding of the legislation”, please clarify the meaning and intent of the first paragraph and four bullets; this Gross Water summary does not seem to comply with the definition of Gross Water in section 10608.12.
2. **Issue Paper 2: Methods and Issues in Determining Service Area Population** – Under the “Issues to be considered” heading, please add an item to discuss how population adjustments made by federal, state, or local agencies will be addressed in the GPCD calculations. According to California Department of Finance, the new 2010 census data will have major impacts on the past population estimates for years 2000 to 2010; however, this information will not be finalized until 2012. Will urban retail water suppliers have the option to modify previously submitted GPCD data, including the baseline GPCD?
3. **Issue Paper 3: Methods and Issues in Estimating Base Daily per Capita Water Use and Compliance Daily per Capita Water Use** – On page 9, please included language from Section 10608.22 under the “Key paragraphs pertaining to baseline daily per capita water use” heading. Please also add the following to the “Issue to be considered” section: Section 10608.22 seems to apply to all urban retail water suppliers that have a base GPCD greater than 100, regardless of which method is chosen to determine the GPCD target. The Base GPCD calculation for this Section is based on a 5-year period ending no earlier than 2007 versus the other Base GPCD calculations that are based on periods ending no earlier than 2004. This section may therefore require all suppliers to calculate two Base and associated Compliance GPCDs and a clarification should be added that identifies which GPCD calculation is the final target.
4. **Issue Paper 5: Criteria for Compliance Year Adjustments** – On page 18, please add under the “Issues to be considered” heading an item to discuss how the Weather-Normalization Method will be developed and what key information and data will be necessary.
5. **Draft Charter:**
 - Page 1 – Should the acronym read EWMP vs EWPM?
 - Please correct Chris Brown’s title to Executive Director
 - Please include role of the AT
 - Please add to USC Role – Opportunity to review CII Task Force documents
 - Page 9, paragraph 5 – Please revise the second sentence to include language that DWR will accept USC consensus recommendations that are consistent with the law.

Please feel free to contact me for any clarification on the above comments,

Penny Falcon
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