From: Heather Cooley [hcooley@pacinst.org]
Sent: Friday, August 06, 2010 4:06 PM
To: Water Use Efficiency
Subject: commments on draft methodologies
Attachments: PI_USC_080510.docx

Good afternoon,
I have attached comments on the draft technologies.

Thank you,
Heather

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August 5, 2010

Manucher Alemi
Department of Water Resources
Division of Statewide Integrated Water Management
Water Use and Efficiency Branch

RE: Comments on Public Review Draft of the Urban Technical Methodologies

Thank you for the opportunity to provide comments on the draft methodologies. Overall, the draft methodologies are clear and consistent with the language of the legislation. My comments here will focus on the regional compliance option (Methodology 9), which was a major topic at the July 28 Urban Stakeholder Committee meeting.

The draft methodology 9 clearly states that an agency can only participate in one regional alliance. I strongly agree with this approach. Allowing agencies to join in multiple alliances may double count water savings. Suppose, for example, that Agency A and Agency B form a regional alliance and that Agency B also forms an alliance with Agency C. Let's say that Agency A falls short of its own 2020 target while Agency B exceeds its target. Together, Agencies A and B achieve their regional target. Agency C, however, fails to invest in conservation and does not meet its individual target. Yet, the savings achieved by Agency B are sufficient for the Agency B + C regional alliance to achieve its target. In short, allowing for multiple regional alliances may result in a double counting of the conservation savings, thereby reducing the overall statewide savings.

I have constructed a table, below, that captures this example. Both regional alliances are in compliance. Yet, the actual total water use for agencies A, B, and C is 5.2 million gallons, whereas the target use should be 5.0 million gallons. Allowing for multiple regional alliances could lower the overall water savings, thereby ensuring that the State does not meet its 2020 target.

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	2000 gpcd	2020 target gpcd	2020 actual gpcd	2020 Population	Target Water Use (MGD)	Actual Water Use (MGD)
Agency A	200	160	180	10,000	1.6	1.8
Agency B	175	140	120	10,000	1.4	1.2
Agency A + B	187.5	150	150	20,000	3.0	3.0
Agency B	175	140	120	10,000	1.4	1.2
Agency C	250	200	220	10,000	2.0	2.2
Agency B+ C	212.5	170	170	20,000	3.4	3.4
Agency A + B + C					5.0	5.2

Furthermore, the regional compliance target should be based on the weighted average of the individual compliance targets. By adopting this approach, any agency, regardless of its per capita use, can participate in a regional alliance.

Thank you again for the opportunity to comment on the draft methodologies.

Thank you,

Heather Cooley

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