

**Huff, Gwen**

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**From:** Falcon, Penny [Penny.Falcon@ladwp.com]  
**Sent:** Friday, June 04, 2010 9:01 AM  
**To:** Water Use Efficiency  
**Cc:** Pettijohn, David; Gentili, Mark; Gackstetter, Thomas  
**Subject:** DWR SBx7-7 - Comments on Methodology Papers

Good Morning,

As instructed at our May 18<sup>th</sup> and June 1<sup>st</sup> meeting, I am providing a brief summary of some of my key concerns as follow-up to my verbal comments provided during the working meetings.

1. Methodology 1: Gross Water Use, pages 1-5 and 1-6 – I maintain concern over the arbitrary definition of “substantial” and use of 4% for Industrial Water Use and 20% for a combined Industrial and Commercial Water use being used to determine if an agency can apply the optional exclusion of process water from their calculation for Gross Water Use. I recommend that the determination should reside with the water agency and no limit should be set.
2. Methodology 3: Base Daily Per Capita Water Use – There are two Sections in SBx7-7 that require calculations of base GPCDs, Section 10608.20 and 10608.22. Since these calculations are based on different base periods and durations, two different base GPCDs will result for each water agency. How will an agency determine their target GPCD? Will the lower resulting GPCD of the two calculation methodologies be applied? There was a lot of discussion and concern on this issue during the May 18<sup>th</sup> meeting; please clarify the proper interpretation of the legislation and update Figure 1 on page 3-3 to reflect how the target GPCDs are calculated.
3. Methodology 8: Criteria for Compliance Year Adjustments, page 8-2 – The legislation allows an agency to adjust their compliance GPCD for specific reasons, including a substantial change to commercial or industrial waste use. The current methodology proposes the requirement that an agency GPCD must exceed their target GPCD by more than 3% before they can apply this adjustment. As discussed during the meeting, there was no basis for the use of 3% and I am concerned that this application goes against the intent of the law. With proper documentation to support any modifications, I recommend that an agency have the flexibility to adjust their GPCD at any time if they have a substantial change in commercial or industrial water use during a given year.

Thank you for this opportunity to comment and please contact me directly with any questions. I look forward to reviewing the next draft prior to our June 22<sup>nd</sup> meeting.

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