

Huff, Gwen

From: William Granger [WGranger@OtayWater.gov]
Sent: Thursday, June 10, 2010 3:17 PM
To: Water Use Efficiency
Cc: Chorneau, Charlotte
Subject: Comments on draft methodologies
Importance: High

I realize I missed the deadline for initial comments, but hopefully the following issues were already noted and this email will serve to reiterate the need to make these revisions. I had started this email and meant to send it at the end of the day on Monday. I just realized that I had not sent it when I found it in my draft email folder.

-William

We have the following comments regarding the draft methodologies that have been developed for the USC.

Methodology 4: Annexation of areas between the baseline and compliance years

Suggestion: This language should only apply to already developed areas that are annexed either during the baseline years or between the baseline and compliance years.

Rationale: Many of the "growth" agencies expect to annex new areas within their service area over the next ten years. In order to annex them into our service area, these areas will be required by the District and its wholesalers to offset their demand and use as little as possible. So, in reality, these developments (*after establishment*) should be using less water per capita since they will be subject to the CA Green Building Code and the Model Landscape Ordinance. High efficiency toilets become the state standard in 2014, but in reality they will be installed before then through the CA Green Building Code.

Methodology 8: Definition of substantial increase with regard to CII usage:

Suggestion: we would like to echo the comments by others at the 5/18 USC meeting that flexibility be added so that an agency can be considered to have had a "substantial increase" even if the increase is less than 3%. Over the next ten years, we will continue adding CII customers and we believe it will be easy enough to pinpoint. Some agencies like ours will be home to most of the future commercial growth in our region.

Not less than a 5% reduction of baseline:

There seemed to be some uncertainty on the definition or intent of the language referring to the 5% reduction. 10608.12 states that the "...reduction shall be no less than 5% of the base daily per capita water use as defined in section 10608.12, b 3

I read it as a five percent minimum reduction of our five year average water use, ending no sooner than 12/31/2007 and no later than 12/31/1010. If our average was 189 gpcd over this five year period, then we believed we were to reduce our usage to at least 183 gpcd. I think some people read it that in this scenario an agency would need to at least reduce their usage by 9.5 gpcd, even if they were already using less than 180 gpcd. We would like to join others who suggested on 5/18 that it be interpreted as we note in our example.

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