



**Rancho  
Water**

February 1, 2019

VIA ELECTRONIC MAIL  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



Board of Directors

**Bill J. Wilson**  
President

**Danny J. Martin**  
Senior Vice President

**Carol Lee Brady**

**Angel Garcia**

**Lisa D. Herman**

**William E. Plummer**

**John V. Rossi**

Officers

**Jeffrey D. Armstrong**  
General Manager

**Eva Plajzer, P.E.**  
Assistant General Manager  
Engineering and Operations

**Richard R. Aragon, CPFO**  
Assistant General Manager  
Chief Financial Officer/Treasurer

**Jason A. Martin**  
Director of Administration

**Eileen Dienzo**  
Director of Human Resources

**Kelli E. Garcia**  
District Secretary

**James B. Gilpin**  
Best Best & Krieger LLP  
General Counsel

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> floor  
Sacramento, CA 95814

**SUBJECT:** Comment Letter – Options for Implementation of a Statewide Low-Income Water Rate Assistance Program

Dear Ms. Townsend:

Rancho California Water District (RCWD) appreciates the opportunity to comment on the State Water Resources Control Board's (Board) Options for Implementation of a Statewide Low-Income Water Rate Assistance Program (W-LIRA) Report and Appendices (Report). RCWD would like to commend the Board and its staff for its release.

RCWD appreciates the stakeholder process and the input you received from the different water agencies and associations. RCWD is concerned that at this time, there are no scheduled workshops between the release of the draft Report and the submittal of the final Report to the legislature. RCWD requests the Board and staff host at least one stakeholder workshop between the comment deadline of February 1 and the release of the final Report. This will allow stakeholders and staff to discuss the current draft and to ensure that comments received by Board staff are properly contextualized in the final Report.

RCWD appreciates the research conducted by staff in exploring multiple scenarios for how a W-LIRA program could be implemented. RCWD agrees that administrative costs are an important consideration when choosing the best implementation pathway. The Report's consideration of distributing the benefit via CalFresh is an important one that should be examined further. In discussion of the benefits of utilizing CalFresh, RCWD recommends the Report and Appendix I both note that utilizing an existing benefit distribution network could result in a much quicker distribution of benefits than might be possible should a new distribution mechanism be created. Additionally, the Report/Appendix should note that since 2005, CalFresh's enrollment has grown by 2 million.<sup>1</sup>

Appendix I suggests that CalFresh has a higher percentage of administrative costs as a percentage of total spending when compared to other affordability programs, but this is not an accurate assessment. Administrative costs associated with CalFresh are fixed to the current program. To extrapolate that an additional monetary benefit would result

<sup>1</sup> "CalFresh (Food Stamp) Participation." Kidsdata.org. Lucille Packard Foundation for Children's Health, [www.kidsdata.org/topic/742/food-stamps/trend#fmt=2261&loc=2&tf=3,84](http://www.kidsdata.org/topic/742/food-stamps/trend#fmt=2261&loc=2&tf=3,84).

in similar administrative costs does not reflect actual practices. RCWD recommends the Appendix include further research on the anticipated administrative costs of the Safe Drinking Water Supplemental Benefit Pilot Program. RCWD believes a simple explanation of change in benefits could be easily included in existing communications with CalFresh enrollees in addition to work with CalFresh Contractors<sup>2</sup>. This benefit could also be communicated in electric and water agencies' billing statements to customers.

RCWD also believes that the credit being on the electric bill should also be explored further as they have the following benefits:

1. Assistance relief is immediate and on a monthly basis – this will directly help with month-to-month cash flow affordability of the program recipient's water utility bill, which also supports the goal of reducing the rate of water shutoffs for low income residents and helping overall living expense affordability.
2. Renters typically directly pay their own electric utilities and this allows for them to benefit directly from the program as well.
3. Electric utilities already verify CARE program so that additional administration compared to the other options is minimal.
4. There are relatively few electric utilities as compared to water utilities that would have to adapt to the change. The electric utilities also, on average, have sophisticated billing and accounting capacities.
5. From a marketing and messaging context – having the credit on a utility bill is the strongest mental connection for the recipient to what the programs purpose is outside of being directly on water bills.
6. From a implementation point of view, the state can generate an online address lookup reference for the electric utilities to be able to reference what water utility the recipient receives service from, and what the applicable typical water bill would be under the program guidelines (i.e. 12 ccf per month) in order to calculate the credit. Water districts would have to work with the state to update their rate information as applicable and submit GIS or other mapping information to the state regarding their service areas to enable an address lookup.

RCWD thanks the State Water Resources Control Board and its staff for consideration of these comments. If you have any questions, please contact Meggan Valencia at 951-296-6922.

Sincerely,

**RANCHO CALIFORNIA WATER DISTRICT**



Jeff Armstrong  
General Manager

---

<sup>2</sup> [http://www.cdss.ca.gov/calfreshoutreach/res/pdf/Prime\\_Contractor\\_Contact\\_List.pdf](http://www.cdss.ca.gov/calfreshoutreach/res/pdf/Prime_Contractor_Contact_List.pdf)

