



February 6, 2017

Delivered via email: commentletters@waterboards.ca.gov

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

RE: Affordable Safe Drinking Water [Association of California Water Agencies' Preliminary Comments Regarding the Development of a Draft Plan for the Low-Income Water Rate Assistance Program (AB 401, Dodd, 2015)]

The Association of California Water Agencies (ACWA) appreciates the opportunity to provide preliminary input during the State Water Resources Control Board's (SWRCB's) development of a plan for the funding and implementation of the Low-Income Water Rate Assistance Program (the Plan) as required by AB 401 (Dodd, 2015). ACWA represents more than 430 public water agencies that collectively supply 90% of the water delivered in California for domestic, agricultural, and industrial uses. Following are ACWA's preliminary suggestions.

1. Commence Collaborative Work with Stakeholders

Subdivision (b) of Section 189.5 of the California Water Code requires the SWRCB to develop the Plan "in collaboration with (...) relevant stakeholders." We appreciate the process staff has used to date. Going forward, the process should involve more than the holding of workshops and public meetings. **Collaboration involves meetings where SWRCB staff and stakeholders roll up their sleeves and jointly work through issues.**

2. Reach Consensus on the Scope of the Need

ACWA suggests that the SWRCB host meetings with stakeholders to facilitate a dialogue on how the level of need should be determined. **If the SWRCB, the water community and other stakeholders can reach alignment on what "affordable" means, how the scope of the need should be determined and what that need is, there will be a solid foundation for engagement on other issues in this program.**

There have been some signals that staff may want to rush finalization of the Plan and the report. Under AB 401, the Plan is due by January 1, 2018, and the report is due by February 1, 2018. This timeframe in the law was developed to allow for legislation in 2018. In a meeting in December, staff was indicating that they were thinking about finishing the Plan and report early so that there could be legislation in 2017. **We recommend that consistent with AB 401 the Plan development be collaborative and not be rushed.**

3. Release the Information Provided by UCLA

ACWA understands that the SWRCB has contracted with the University of California Los Angeles (UCLA) for the preparation of a needs assessment based on different levels of rate assistance.

So that the development of the needs assessment can be a collaborative process as required by AB 401, ACWA requests that all of the information provided by UCLA to the SWRCB be made available to the public.

4. Consider Information from State and Federal Welfare Agencies

In determining the scope of the water affordability need in California, ACWA also suggests that the SWRCB utilize information available from State and federal welfare agencies.

5. Consider Existing Programs

Many ACWA member agencies have spent countless hours designing and staffing assistance programs to meet the needs of their low-income customers. These creative programs, which rely on funding sources other than rates, are Proposition 218 compliant and funded through various means, including voluntary contributions. These existing programs are successful because they are designed to meet the needs of the local community. The Plan presented by the SWRCB should recognize the successful design and implementation of these programs.

ACWA appreciates the SWRCB's consideration of ACWA's comments. I am available to answer questions at (916) 441-4545 or cindyt@acwa.com.

Sincerely,

A handwritten signature in black ink that reads "Cindy Tuck". The signature is written in a cursive, flowing style.

Cindy Tuck
Deputy Executive Director for Government Relations

cc: The Honorable Felicia Marcus, Chair, State Water Resources Control Board
The Honorable Members, State Water Resources Control Board
Ms. Kim Craig, Deputy Cabinet Secretary, Office of Governor Jerry Brown
Mr. Thomas Howard, Executive Director, State Water Resources Control Board
Mr. Eric Oppenheimer, Chief Deputy Director, State Water Resources Control Board
Mr. Max Gomberg, Climate and Conservation Manager, State Water Resources Control Board