

Hi Jessica,

Per the preliminary framework and the request for feedback, please consider the following. Despite explicitly stating on its own website that “It is not appropriate to use Residential Gallons Per Capita Day (R-GPCD) water use data for comparisons across water suppliers, unless all relevant factors are accounted for. Factors that can affect per capita water include ... Rainfall, temperature, Eto; population growth; population density; socio-economic measures such as lot size and income; and, water prices” it appears the framework is doing just that.

When the cutbacks are analyzed, the reduction list squarely impacts large users (large lots / warmer climates) – rather than water use efficiency. Furthermore, agencies that have already cut-back (pre 2013) are possibly unfairly penalized while those that were wasteful in 2013 and cut back in 2014 are rewarded.

Overall, I feel this sends the wrong message and is too short-sighted in approach and definition of “conservation”. It is not appropriate to define conservation as 2013 demand less 2014 demand. Clearly, many factors influence water demand and cannot simply be pulled under the conservation umbrella.

Thank you and please let me know if you have any questions or comments.

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