



VALLEY OF THE MOON WATER DISTRICT

A Public Agency Established in 1962
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April 13, 2015

Honorable Felicia Marcus
California State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814

Via Email: Jessica.bean@waterboards.ca.gov

RE: Mandatory Conservation Proposed Regulatory Framework

The Valley of the Moon Water District supports the efforts of the State Water Resources Control and the aggregate mandatory 25% reduction. To date our District has reduced demands 19% compared to 2013 and is fully committed to meeting regulatory requirements.

Through the process of reporting monthly data it has become apparent that some of the conservation saving swings that are documented from month to month are not due to increased or decreased conservation efforts, but rather a deficiency in the R-GPCD calculation. This occurs because the current formula includes the **Days per Month** in the denominator which does not match the number of **Days per Production Cycle**. Many wholesale agencies throughout the state do not have the ability to have the days per month match the days in a billing cycle.

For example, our wholesaler's billing period ranges from 28 days to 35 days per cycle. In a month with fewer days it could make conservation savings appear higher than actual and in a cycle with more days it artificially makes conservation savings lower than actual.

It is Valley of the Moon Water District's desire to have accurate reporting without impacting the aggregate 25% reduction. In order to achieve this we are requesting that instead of using **Days per Month** that the database be updated to include a field for self-reported **Days per Production Cycle**.

Thank you for your consideration.

A handwritten signature in cursive script that reads "Daniel Muelrath".

Daniel Muelrath
General Manager