

# November 17<sup>th</sup>, 2020 Municipal Subgroup Meeting Questionnaire Responses

These are responses collected from a questionnaire distributed during the November 17, 2020, Municipal Subgroup Meeting.

(\*Note: Different colors are different responses)

## Is there additional data related to GPCD that you would be interested in seeing at the next Municipal Subgroup meeting?

We are interested in understanding where the data that is being presented came from, so we better understand the context.

We would like to see the detailed methodology for ADWR's GPCD data that was shown on November 17th. Please include: (1) data and methodology for estimating Provider's Service Area Population, (2) The different water sources that were in the Residential and Non-Residential GPCD figures displayed in the GPCD Power BI dashboard. Please indicate where these data can be found on an Annual Report, if applicable. (3) Please add a feature to make the Dashboard data exportable for stakeholders to review.

Because ADWR has already completed this analysis, it would be helpful if the Department could post this information online prior to the next Municipal Subgroup meeting.

ADWR presented a non-residential GPCD metric for several providers but was unclear or uncertain how those numbers were calculated. A better explanation of which annual report schedule was used and all variables obtained to come up with those numbers would be helpful. If ADWR were to do this it should be in line with the residential GPCD. This is an important point as calculations between the two need to be apples to apples. This would only be necessary if this ends up being an avenue that ADWR would like to take for the 5MP.

Calculation of GPCD is the foundation of the municipal conservation programs, so the data that is used and how it is calculated is extremely important. In order to provide a more informed response, we would like to see what data and methodology ADWR is proposing to use to calculate GPCD in the 5th Management Plan.

Tempe utilizes population numbers for our service area from the Maricopa Association of Governments. This is the methodology that is utilized by Economic Development offices throughout the Valley. Would you please share the data and methodology used to identify the Provider's Service Area Population?

Additionally, we would like to see the detailed methodology for additional GPCD data that was shown on November 17th, including the different water sources that were included in the Residential and Non-Residential GPCD figures displayed on the GPCD Power BI dashboard.

It would be helpful if the Department could post this information online prior to the next Municipal Subgroup meeting.

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We would like to see the detailed methodology for ADWR's GPCD data that was shown on November 17th. Please include: (1) data and methodology for estimating Provider's Service Area Population, (2) The different water sources that were in the Residential and Non-Residential GPCD figures displayed in the GPCD Power BI dashboard. Please indicate where these data can be found on an Annual Report, if applicable. (3) Please add a feature to make the Dashboard data exportable for stakeholders to review.

Because ADWR has already completed this analysis, it would be helpful if the Department could post this information online prior to the next Municipal Subgroup meeting.

This information was gathered by the Arizona Department of Water Resources.

In order to better follow the GPCD calculations as most recently presented, it would be helpful to see fully explained data methodologies and datasets for all components of the GPCD calculations, including: a description on where data is pulled from (i.e., are certain numbers coming from the Annual Reports or other external data sources).

### **Do you have recommendations on whether or how components should be used to calculate the GPCD requirement?**

Avondale does not support the component methodology. The component approach (particularly the non-residential component) was intended to capture the conservation potential of each water provider regulated under the Total GPCD program. It would not be feasible to complete a sufficiently rigorous analysis on the conservation potential of each water provider's vastly unique and variable non-residential customers in time to complete the 5MP.

Scottsdale supports a residential only GPCD metric. However, it does not support a standalone non-residential GPCD metric. Commercial and Industrial customers range widely in type of service and water use. While many commercial customers bring economic value and jobs to a community, that is in no way tied to the specific population with that community. Scottsdale also believes tying these two variables together brings with it the optics that that water use is undesirable, which is counter to a healthy community and economy. For example, population growth may be increasing 1-2% annually, but with one or two large commercial customers, who add value to the local and regional economy, the associated increase in water use could be viewed as detrimental. What Scottsdale has experienced, and we believe others have as well, is that programs that work with commercial customers to efficiently use water through BMPs is both beneficial and effective. This allows the provider the flexibility to effectively and efficiently address the varied types of commercial water users in the service area. We do not believe it is possible to find a single metric to aggregate all commercial customers into one value and find actual water savings in just that value. That narrative is concerning as it could create a negative outlook on water use and have economic consequences for the community. It is imperative that ADWR understands this important point for the sake of the economic viability of our communities and we encourage the department to reach out to stakeholders to have a deeper conversation about these concerns.

We request to have a greater understanding of the components and how they will be updated for the 5th Management Plan. It is Glendale's preference to stay in the GPCD program under the 5th Management Plan, although we request to have a greater understanding of the data and methodology used in this calculation.

We do not support the component methodology. The component approach (particularly the non-residential component) was intended to capture the conservation potential of each water provider regulated under the Total GPCD program. It would not be feasible to complete a sufficiently rigorous analysis on the conservation potential on our non-residential customers in time to complete the 5MP.

AMWUA does not support the component methodology. The component approach (particularly the non-residential component) was intended to capture the conservation potential of each water provider regulated under the Total GPCD program. It would not be feasible to complete a sufficiently rigorous analysis on the conservation potential of each water provider's vastly unique and variable non-residential customers in time to complete the 5MP.

We do not support the inclusion of non-residential water use as part of the GPCD framework. The GPCD framework is not an appropriate metric for analyzing and regulating non-residential water use. Under this framework, one User with high volume water consumption can come in and throw off these numbers. That particular User may bring economic and social benefits to the area while using their water efficiently and at the same time dramatically increase GPCD numbers painting an inaccurate picture of the situation. We don't want to set water conservation goals up to be counter to economic development goals - but rather make them complementary. Non-residential BMPs seem to be a good balance here as they focus on efficiency over total water use.

Peoria and AMWUA does not support the component methodology. The component approach (particularly the non-residential component) was intended to capture the conservation potential of each water provider regulated under the Total GPCD program. It would not be feasible to complete a sufficiently rigorous analysis on the conservation potential of each water provider's vastly unique and variable non-residential customers in time to complete the 5MP.

## **Do you have feedback or recommendations on the framework or formulas that may be used to establish minimums, maximums, or GPCD requirements?**

The facts and feedback expressed by multiple public and private water providers at the 11/17/20 meeting and elsewhere are quite clear: GPCD is not an appropriate nor effective means of reducing non-residential water use. We strongly request ADWR to integrate this reality into the 5MP. Service area population does not drive non-residential water use to the extent that would justify a “per capita” program to regulate the commercial sector. The GPCD Program should be split into a residential element that seeks reasonable reductions in GPCD, and a non-residential element that prescribes implementation of BMPs.

It is concerning that ADWR suggested at the 11/17/20 meeting to effectively cap municipal water use through a non-residential GPCD target. Any non-residential GPCD target that ADWR might establish is destined for failure if a single high-volume water user were to move into a water provider’s service area; regardless of how economically valuable or efficient that entity’s water use may be. ADWR should not penalize Designated providers whose water use is consistent with the Assured Water Supply Program and AMA management goal.

Before addressing minimums, maximums, or GPCD requirements it will be crucial to have a better understanding of how the formulas currently function and how those metrics are derived, which refers to Question 2: Additional Data. Once we understand the strengths and weaknesses of those metrics, we can better assess which formula will work the best. It would be unwise and misrepresentative to select a formula that utilizes a metric that has been inconsistently reported. It may be beneficial to revisit Schedule F1, Part 2 and clarify how water is to be reported on this form.

There are some limitations with the current Total GPCD framework since it includes residential and non-residential use. There are variations in customer make-up under the combined GPCD calculation, so is not helpful for goal setting or comparing utilities to each other. It is also difficult to determine the intensity of water use and potential for water conservation and efficiency.

The City of Goodyear supports disaggregating the two GPCD components and regulating them individually, i.e. the city would support a residential GPCD program and non-residential BMPs. It is not effective nor appropriate to regulate non-residential water use with a GPCD target. Regulating both components under the same umbrella may have negative impacts on the economic vitality of municipal providers by hamstringing their ability to provide water to new industries even though water may be available in their DAWS.

When setting goals for residential GPCDs, Goodyear would suggest considering a provider’s existing GPCD and city water-use characteristics. Goodyear has one of the lowest GPCDs of the AMWUA cities (residential – 82 in 2018). Being a relatively new city, nearly all Goodyear residents have water efficient appliances and fixtures. It would not make sense to implement interior fixture/appliance rebates in the near future therefore, outdoor use would be targeted. Goodyear residents are also fairly conservative with landscaping choices. If goals are too severe, it could put Goodyear at a Development disadvantage. Goodyear does not want to be in a position where we are forced to implement more stringent outdoor residential requirements than neighboring cities. Residents may choose to live in cities with higher allowable GPCDs in order that they may have reasonable landscaping choices that the City of Goodyear could not support due to a regulatory constraint. We are amenable to reasonable reductions in residential GPCD as long as it allows us to be economically competitive with other AMA cities.

We do want to emphasize that the city does have conservation/water reduction goals. We are targeting outdoor water use particularly larger turf facilities. They are individual users or at a minimum classed as turf meters and therefore, do not fall under residential.

Based on the comments during the 11/17/20 meeting, it seems that GPCD is not an appropriate means of effectively reducing non-residential water use. Service area population does not drive non-residential water use to the extent that would justify a “per capita” program to regulate the commercial sector. The GPCD Program should be split into a residential element that seeks realistic reductions in GPCD and a non-residential element that prescribes implementation of BMPs that produce measurable results and help drive efficiency and reduce water waste. Non-residential GPCD targets are not particularly reflective of water efficiency or water conservation. For example if a single, high-volume water user

moves into our service area, it would skew the GPCD numbers no matter how efficient that entity's water use may be, or how high the economic value they bring to the community. The goal of this program should be to ensure that water use is consistent with the Assured Water Supply Program and the AMA management goal.

The facts and feedback expressed by multiple public and private water providers at the 11/17/20 meeting and elsewhere are quite clear: GPCD is not an appropriate nor effective means of reducing non-residential water use. We strongly request ADWR to integrate this reality into the 5MP. Service area population does not drive non-residential water use to the extent that would justify a "per capita" program to regulate the commercial sector. The GPCD Program should be split into a residential element that seeks reasonable reductions in GPCD, and a non-residential element that prescribes implementation of BMPs.

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The overall goal of the management plans is to drive groundwater use reduction through the reduction of total water use. As a result, this model assumes that continued, constant water use reductions are an ideal goal. A goal focused on constant reductions ignores that there is a baseline level of water that is needed for everyday actions, the landscape and the economy – all of which are beneficial uses of the water. The goal should be to reduce inefficient water use, so that conservation enhances our way of life instead of just restricting consumption. GPCD is inherently problematic as it does not easily measure efficiency for residential consumption and does not measure efficiency at all for non-residential consumption.

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### **Do you have feedback or recommendations on the amount that can be credited and/or debited under the flexibility account?**

No recommendations at this time. At a minimum, the Flexibility Account credit limit should not be reduced, and the debit limit should not be increased. It would be helpful for ADWR to walk through an example (with numbers) of how the Flexibility Accounts work under the 4MP.

No recommendations at this time, but it would be helpful to see what ADWR is proposing for the Flexibility Account under the 5th Management Plan.

No recommendations at this time. At a minimum, the Flexibility Account credit limit should not be reduced, and the debit limit should not be increased. It would be helpful if ADWR walked through an example (with numbers) of how the Flexibility Accounts work under the 4MP.

With much of the GPCD methodology currently open for discussion, I don't think that right now is the time to attempt solve aspects of the flexibility account. There are some fundamental concepts of the GPCD program that need to first be determined in order to work through an associated flexibility account.

## How can we improve these subgroup meetings?

It would be helpful if presentation slides could be posted to the 5MP Concepts page before meetings and if agendas could be more specific to allow folks to better prepare.

Thank you for allowing two weeks to submit responses to the feedback questionnaires!

It would be helpful if presentation slides could be posted to the 5MP concepts page before meetings and if agendas could be more specific/targeted to allow stakeholders to better prepare. Thank you for allowing two weeks to submit responses for the feedback questionnaires. As a side, it is concerning that the NPCCP edits are due December 31. Though there is enough time on paper, many stakeholders are out of office or short-staffed during the holidays and it could be difficult to get upper level approval for final submissions.

We appreciate the Department's hard work and collaboration with this concept. We are happy that we are able to have a platform to share our views and concerns and know that the Department is working hard to find a solution that works for the State's water management goals now and into the future.

It would be helpful if ADWR's agenda could be more detailed and share the presentation slides a couple days in advance of the meeting. It would also be helpful if ADWR could allow for at least two weeks for attendees to fill out the questionnaires since we have an internal review process before comments can be sent to ADWR. Thank you for the opportunity to provide comments about the 5th Management Plan.

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I believe it would be helpful to have deeper dive workshops available to go through the data methodology and provide sample calculations, citing where information is pulled from in order to calculate the GPCD numbers. This way, people would be more informed about the data methodology before coming to the Subgroup meetings to discuss options. Additionally, it would be preferable to have detailed Agendas posted ahead of time.