

## I. Public Education Program (Required of all providers)

- The title says (Required of all providers) but the first sentence specifies 'large municipal providers.' This is confusing.

### Category 1: Education and Public Awareness

#### 1.1 Local or Regional Conservation Campaign

#### 1.2 Special Events, Programs, and Community Presentations

#### 1.3 Adult Education and/or Training

- This BMP would require utilities at tiers 3 and 4 to organize, execute, and track 8 adult education focused conservation events every year. This type of program demands a large amount of time and resources. Having such prescriptive event requirements may result in fewer organizations selecting this BMP. This is a potentially negative outcome given that direct interaction and communication is often a very effective means of increasing conservation awareness and/or behavior change. Having several large and effective events could have the same impact as 8 smaller events.

#### 1.4 Youth Education

- Feedback on adult education applies here as well. See above.

#### 1.5 Xeriscape Demonstration Garden

#### 1.6 Industry and/or Regional Partnerships

### Category 2: Targeted Outreach and Consultation

#### 2.1 New Homeowner Outreach

- Does this have to start with a phone call? Many customers prefer email as a means of contact.

#### 2.2 Residential Audit and Landscape Consultation

- Combining audit and landscape BMPs and then separating into residential and non-residential was a great idea.

#### 2.3 Non-Residential Audit and Landscape Consultation

#### 2.4 Residential Water Budget

2.5 Non-Residential Water Budget

2.6 Customer High Water-Use Inquiry Resolution

2.7 Customer High Water-Use Notification

Category 3: Physical System Evaluation and Improvement

3.1 Distribution System Leak Detection and Mitigation

3.2 Meter Repair or Replacement

3.3 Advanced Metering Infrastructure (AMI) Installation

- This is a good BMP. We suggest perhaps offering additional points to utilities that fully leverage AMI data by providing customers with leak alerts and high consumption alerts.

3.4 Advanced Metering Infrastructure (AMI) Maintenance

- This new BMP makes sense and is a practical addition.

3.5 Approved Comprehensive Water System Audit Program

Category 4: Provider Level Requirements

- Many of the BMPs in this section reference compliance requirements that likely would be difficult for a smaller water utility to enforce. Worth keeping as options but may not be feasible for private utilities to enact.

4.1 Low-Water-Use Landscape Requirements

4.2 Water Tampering and/or Water Waste Prohibition

4.3 Plumbing Requirements

4.4 Water Feature Limitations

4.5 Water-Efficient Model Home Landscape Requirements

4.6 Graywater or Rainwater System Requirements

4.7 Water Intensive Commercial User Requirements

4.8 Landscape Watering Restrictions

4.9 Water-Efficient Hot Water Device or System Requirements

4.10 Retrofit on Resale

4.11 Non-Residential Landscape Water-Use Efficiency Standards

4.12 Non-Residential Water-Use Plan Requirement

4.13 Conservation Rate Structure

4.14 Enforcement or Audit of Requirements

Category 5: Residential Conservation Incentives

5.1 Residential Customer Assistance

5.2 Residential Toilet Incentive

5.3 Residential Smart Irrigation Technology Incentive

5.4 Residential Water-Efficient Appliance Incentive

5.5 Residential Graywater Incentive

5.6 Residential Rainwater Harvesting Incentive

5.7 Residential Landscape Conversion Incentive

5.8 Residential Xeriscape in New Landscapes Incentive

5.9 Residential Pool Cover and/or Removal Incentive

Category 6: Non-Residential Conservation Incentives

6.1 Non-Residential Customer Assistance

6.2 Commercial and Industrial Customer Incentive

6.3 Non-Residential Toilet and/or Urinal Incentive

6.4 Non-Residential Smart Irrigation Technology Incentive

6.5 Non-Residential Water-Efficient Appliance Incentive

6.6 Non-Residential Graywater Incentive

6.7 Non-Residential Rainwater Harvesting Incentive

6.8 Non-Residential Landscape Conversion Incentive

6.9 Non-Residential Xeriscape in New Landscapes Incentive

## 6.10 Non-Residential Large Landscape Incentive

### Category 7: Research, Analysis, and Innovation

- Increasing the point value of these BMPs is a good incentive to utilities to invest in these more time and resource intensive projects. This is in line with a goal of increasing water management innovation.

#### 7.1 Market Surveys and/or Focus Groups

#### 7.2 Research of a New Technology and/or Technique

#### 7.3 Pilot Plan Development for a New Technology and/or Technique

#### 7.4 Piloting a New Technology and/or Technique

#### 7.5 Evaluation of a New or Emerging Technology and/or Technique

#### 7.6 Analyzing a Best Management Practice (BMP) for Actual Water Savings

### III. Procedure for Adding a Best Management Practice to the List of Additional Best Management Practices

- This section again references a 'large municipal provider,' is this classification of utility the only type that can apply to add a BMP?

#### Any other feedback on Appendix 5C, the BMPs, BMP Categories, or anything else?

- The customer base of a company often dictates the size of the conservation team. For a utility right at the fringes of categories 3 and 4 the additional resources needed for the stepped BMP requirements in category 1 may result in fewer utilities selecting these BMPs. This would be unfortunate because these BMPs can be effective and result in changed behavior. There is a considerable difference in resource availability within the 'large' utilities category. Utilities with 30k connections and very large utilities with 60k+ connections are very different. Perhaps meets, exceeds, and excels classifications (as suggested by ADWR) would encourage utilities with the appropriate resources to go above and beyond the BMP conservation requirements.