

AMWUA Responses to ADWR 5MP Municipal Conservation Program Proposals Questionnaire

April 16, 2021



Please provide any feedback and/or questions you have regarding the 5MP GPCD Proposal:

Total GPCD Target Calculation

AMWUA understands that ADWR is committed to retaining a Total GPCD conservation program to satisfy the “reductions in per capita water use” statutory provision of the Management Plans. With this approach fixed for the 5MP, we acknowledge that the annual 1% GPCD reduction from the previous 3-year average is an improvement over the methodology for the 4MP. Nevertheless, this improvement does not address all of the issues inherent in trying to utilize Total GPCD as an instrument for driving conservation.

We would like to reiterate a number of points that AMWUA has made previously throughout the 5MP stakeholder process. Namely, that Total GPCD calculations are often erroneously utilized to compare water use between different entities and that this metric is frequently misconstrued as a measurement of a resident’s average water use within a water provider’s service area. ADWR’s Total GPCD Program adds more complexity into the mix, utilizing this metric as a regulatory mechanism. Considering this context, and the fact that the Total GPCD Target and Compliance calculations have changed between every single Management Plan, we ask that ADWR continue to pay special attention to the way in which the 5MP Total GPCD Program is described within the Management Plan and how those calculations are used elsewhere.

Total GPCD Compliance Calculation

Since the 1st Management Plan, ADWR’s Total GPCD calculation has encouraged the utilization of reclaimed water as a renewable supply alternative to groundwater. This latest proposal would modify the Total GPCD calculation in a way that would disincentivize Direct Potable Reuse (DPR) while maintaining the existing provisions for direct-use reclaimed water. Discouraging advancements toward DPR is not the appropriate direction to take the regulatory framework for water management.

Additionally, the language as proposed on 4/6/21 raises other questions. Would effluent recovered within the area of impact that was distributed for potable use now be included in the GPCD calculation? If so, this would change the Total GPCD Program to penalize responsible recovery of effluent near the location of storage.

In light of these and other potential issues, ADWR should maintain the compliance calculation for Total GPCD as it currently is. There is ample opportunity for further, more in-depth discussions on this topic in the 5th Management Period.

GPCD Flex Account Modifications

As ADWR notes in its 4/6/21 proposal and the 4th Management Plan, the Flexibility Account provision of the Total GPCD Program was designed to provide water providers with flexibility to “borrow or bank water [in years with] variation in use caused by weather or other unforeseen circumstances.”

It is not clear why the Flexibility Account provisions need to be adjusted in the 5th Management Plan. In fact, Arizona has recently experienced a year of record heat and is still enduring a pandemic that many certainly consider an “unforeseen circumstance” which warrants regulatory flexibility. The Flexibility Accounts should not be changed solely for the sake of consistency. Each of the five AMAs has its own unique considerations, including differing climate, water resources, and demand profiles and do not necessarily need alignment in every aspect of their conservation programs. At a minimum, the debit limit in the Phoenix AMA should not be reduced from -20, as that threshold provides an appropriate cushion for water providers to absorb highly variable year-to-year changes in water demand.

Please contact Sam Draper (sdraper@amwua.org) and Patrick Adams (padams@amwua.org) if you have any questions or comments.