



The Climate Registry

September 5, 2014

Laura Peters, Senior Engineer
California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236

Re: Water-Energy Grant Program Guidelines

Dear Ms. Peters,

On behalf of The Climate Registry (TCR), thank you for this opportunity to submit feedback on the Department of Water Resources (DWR's) Water-Energy Grant Program guidelines. We strongly support the state of California's efforts to combine energy and greenhouse gas (GHG) emission reductions with funding for water efficiency programs and recognize DWR's leadership in creating opportunities for GHG emissions reductions through this policy.

TCR encourages DWR to prioritize grant funding for water efficiency programs and projects that can demonstrate the largest potential GHG emissions reductions resulting from the improved management of energy, water, and wastewater combined. Funded projects should additionally utilize standardized best practice quantification methods that ensure GHG emissions reductions are real and comparable, so that aggregated savings totals are meaningful.

In order to ensure applicants are able to provide high quality GHG emissions data, DWR should include guidance on best practice quantification methods for GHG emissions embedded in water. These embedded emissions should take into account local GHG impacts of consumed electricity and enable the management of emissions associated with energy consumption through contracts for low emissions energy including the purchase of renewable energy certificates.

It is imperative that efforts funded through the Greenhouse Gas Reduction Fund result in meaningful GHG emission reductions, determined through best practice quantification methods. Only by providing standardized guidance on GHG emissions reductions projections and ex-post

quantification will DWR be able to ensure that the programs and projects receiving grants are those with the greatest impact on climate change. We greatly appreciate the opportunity to provide input on these guidelines and advocate for high quality GHG emissions data that will help California water agencies demonstrate their climate change mitigation leadership.

Sincerely,

A handwritten signature in black ink that reads "Peggy Kellen". The signature is written in a cursive, flowing style with a long horizontal line extending to the right.

Peggy Kellen
Director of Policy
The Climate Registry