Submitted ELECTRONICALLY

November 13, 2015

Ms. Shelby Livingston
Branch Chief, Climate Investments Branch
Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Dear Ms. Livingston:

The Association of California Water Agencies ("ACWA") appreciates having the opportunity to comment on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan ("Draft Plan"). As an association that represents nearly 430 public water agencies that collectively supply approximately 90% of the water delivered for domestic, agricultural and industrial uses in California, ACWA supports investments in incentives that promote water system improvements and incorporation of renewable energy projects as effective ways to voluntarily reduce energy use and greenhouse gas ("GHG") emissions from the water sector.

One of the goals identified by state agencies at the October 2015 Scoping Plan workshop was saving water. Programs such as Water-Energy Grants and the Water Energy Technology program promote water system improvements, and appliance rebate and installation programs directly reduce water consumption at the point of use. Continuing to invest in these programs will complement investments that water agencies throughout the state are already making in conservation activities.

Another goal that was identified at the October 2015 Scoping Plan workshop was to pursue GHG emission-reducing synergies among sectors. Providing funding for water efficiency programs not only reduces water use, but also reduces energy consumption at the point of use. ACWA encourages the Administration to continue to invest in these programs, and
looks forward to continuing to work with the Air Resources Board and other state agencies on the implementation of water, energy and GHG reduction strategies.

Sincerely,

Rebecca Franklin  
Regulatory Advocate

cc: Mr. Matt Almy, Assistant Program Budget Manager, Department of Finance