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**AB32 Scoping Plan Comments**

Water-related energy use in California consumes approximately 20 percent of the state’s electricity, and 30 percent of the state’s non-power plant natural gas. Of that amount, about 8 percent of the state’s electricity is used by water and wastewater agencies for water and wastewater pumping and treatment.

A low carbon water future is instrumental to the future of California. Consistent benchmarking of the energy and associated GHG impacts of water sector actions is important to building awareness about opportunities to reduce the water sector’s carbon footprint.

The Climate Registry is the pre-eminent GHG reporting program in North America, created and governed by the State of California and more than sixty other state, provincial and tribal jurisdictions. We offer the following recommendations:

1. California’s water and wastewater agencies should be encouraged to measure, report and verify their energy use and greenhouse gas emissions through The Climate Registry.
2. The State of California should encourage the development of a water-energy protocol and “sub-registry” within The Climate Registry that provides water and wastewater agencies with consistent and specific metrics that help them understand the emissions impacts of their resources and operations management decisions.
3. Just as California’s retail electricity suppliers now disclose information about the energy resources used to generate the electricity they sell, water agencies should be encouraged to disclose information about the energy intensity and GHG impacts of their water supplies – a “Water Content Label”, similar to electricity suppliers’ “Power Content Label.”
4. Water and wastewater agencies will need technical and financial assistance implementing their Water Content Labels. State agencies should provide the technical and financial resources needed to help water and wastewater agencies collect, compile and measure water-energy data, as well as to report and verify the water-energy benchmarks.
5. Establishing a water-energy benchmark will substantially help water and wastewater agencies, and their customers and stakeholders, better understand the energy and GHG impacts of resource, operational and management options. Water and wastewater agencies that report their GHG emissions to The Climate Registry and agree to take actions to reduce their GHG impacts should be given preferential consideration for state grants, subsidies, incentives and low-interest loans.

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