

**From:** [Rob Beggs](#)  
**To:** [CWC Water Storage Investment Program](#)  
**Subject:** Comments on Water Storage Investment Program Quantification Regulations  
**Date:** Tuesday, March 08, 2016 9:54:06 PM

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We appreciate all the efforts the Water Commission, DWR, and other groups have put into programs for improving water supply reliability for California. We have the following comments on the draft Water Storage Quantification Regulations and the evaluation of water storage alternatives in general.

We believe that a strong economy is vital for providing the resiliency for a transition to low carbon energy sources and that water supply reliability is a key factor for the economic resiliency of California.

As climate change effects intensify the challenges of managing California's water system, projects that provide not only additional storage, but large scale operational flexibility are likely to have much greater relative value. The present value method used in the comparison of alternatives diminishes the effect of increasing relative future benefits, and thereby does not give sufficient credit to projects that provide long term operational flexibility. We ask that the Commission consider addressing this discrepancy by reducing the discount rate or providing some other adjustment in the calculation of benefits for projects that provide operational flexibility.

Another challenge with the transition to low carbon energy sources will be providing energy storage to deal with the intermittency of solar and wind power generation. We ask that the Commission consider giving the greatest credit possible for projects that provide a means for energy storage and recovery due to the increasing value of this energy storage when power generation is from renewable low carbon sources.

Sincerely,

Citizens' Climate Lobby Nevada County and Yolo County Chapter Leaders

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Note: The opinions expressed herein only represent those individuals listed above. Citizens' Climate Lobby International has not taken a position on the draft quantification regulations.