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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION OF)
UNITED WATER IDAHO INC. FOR APPROVAL) CASE NO. UWI-W-06-5
OF ITS WATER CONSERVATION PLAN AND)
APPROVAL OF A SURCHARGE) COMMENTS OF THE
) COMMISSION STAFF
)
_____)**

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Weldon B. Stutzman, Deputy Attorney General, in response to the Notice of Application and Notice of Modified Procedure in Case No. UWI-W-06-5 issued in Order No. 30228 on January 24, 2007, submits the following comments.

BACKGROUND

In the Company's last rate case, Case No. UWI-W-04-04, the Commission directed the Company to update its conservation plan and file it with the Commission on or before April 1, 2006. Prior to that deadline, United Water asked for an extension, and the Commission subsequently approved a new filing date of December 1, 2006. On December 1, 2006, United Water Idaho Inc. filed an Application requesting approval of an updated water conservation plan, along with implementation of a surcharge to pay for the programs in the plan.

United Water's Application states that it evaluated 91 potential conservation measures, selecting 17 for further study and evaluation. This analysis produced a list of seven conservation

measures the Company believes are cost effective. United Water currently spends approximately \$124,200 per year on conservation measures. If the seven additional programs become part of its conservation plan, those costs would increase to approximately \$244,000 per year. The Company proposes to implement the changes over the next three years.

United Water requests approval of a surcharge of 0.33% on amounts billed under the Company's Tariff Schedule 1, General Metered Service, to recover the costs of its conservation programs. The Company estimates the surcharge would add approximately \$1.20 annually to the average residential customer's bill.

STAFF ANALYSIS

Summary

Staff reviewed United Water Idaho's Water Conservation Plan and has concerns with both the Plan evaluation process and specific programs selected for implementation. The screening process that eliminated many potential measures appears to be subjective, and produced primarily educational programs that are difficult to evaluate for acquired savings. Staff believes the two stage planning process prematurely eliminated a number of potentially good programs from further analysis.

The Company used a marginal cost methodology that fails to reflect the true cost of supply side options, which eliminated some programs that might produce significant savings. The measures recommended for implementation are primarily continuations or modest expansions of current customer information and education efforts. The Plan does not sufficiently detail what additional activities would be accomplished with the significantly increased funding over current efforts. Finally, Staff believes the proposed funding mechanism, a conservation rider, is premature, given the ill-defined expansion of the informational programs and the lack of any meaningful evaluation mechanism.

Staff does support implementation of the measures identified in this Plan, with the costs deferred for future recovery, pending a detailed description of the actual program activities and some evaluation of conservation impact. The Company should re-evaluate its Plan, based on a more realistic supply side marginal cost. It should then propose a broader range of conservation programs that can be objectively evaluated for conservation savings and supported by the informational programs already in place.

Plan Components

A. Continue Current Efforts.

The Plan advises the continuation of current conservation efforts, including:

- * Funding a full-time outreach/education coordinator
- * Creating and maintaining a web site.
- * Conducting summer media/advertising campaign
- * Participating in relevant community events
- * Provide information and water saving kits upon request
- * Continue baseline school education program
- * Fund Water Efficient Landscaping (WEL) classes at current levels
- * Maintain existing Xeriscape demonstration garden

The Company did not provide a budget that identified expenditures for each element of the current program, indicating that it has historically varied from year to year. The total budget for continuation of existing efforts is \$124,200 per year, or \$496,800 over the 5 years included in the Plan.

B. Recommended New Measures.

The seven new recommended measures are:

1. Additional Xeriscape Demonstration Gardens. Additional gardens would be created on UWI property and in public spaces of cooperating public agencies. In cooperation with a partnering group, this program would also provide a limited number of grants to increase the number of xeriscape demonstration gardens located in residential neighborhoods. By increasing the visibility of xeriscape landscaping techniques, this measure has a goal of influencing about 15% of single-family residents to take steps to conserve landscape irrigation water over the next 20 years. The Plan identifies a tentative budget of \$87,000 to be spent over two years. This is in addition to the funding for the maintenance and upkeep of UWI's current demonstration garden, located at the Company's office, which costs are part of the Company's current budget.

The Plan does not specify how many new gardens would be completed, how or where sites would be selected, or any other details as to how this would be implemented. The Plan indicates it would seek Partners, such as Idaho Rivers United (IRU), in developing additional

gardens. It does not indicate how it would be integrated with the existing IRU Water Saving Landscaping demonstration gardens grant program, which has provided grants for the construction of nearly a dozen water saving landscaping demonstration gardens in UWI's service area in the past two years. These details should be provided to the Commission prior to implementation.

2. Expand Water Efficient Landscaping (WELs). The Company currently provides Water Efficient Landscaping (WEL) workshops in partnership with Boise City Public Works Department and the University of Idaho Extension. This program would seek to boost attendance at these workshops, possibly by using incentives, such as plants or drip system vouchers. The goal is 900 participants a year. The funding for the actual workshops is contained in the current program budget, and the additional funding would go toward increasing attendance at the workshops. The annual budget for this measure is \$11,200, with a total cost of \$56,000 over five years.

Details as to how this measure would be implemented were not included, but should be provided to the Commission before implementation. No evaluation component is included in the program.

3. Residential School Education. This is also an expansion of an existing program, providing elementary grades four to six with water conservation materials, workbooks and teaching aids. The expansion would increase the programs so that it would reach every elementary school once every three years. The goal is to encourage water conservation by contact with grade school students from 1,500 families per year.

The funding for a baseline education program is contained in the current program budget. This proposal would expand that effort with an additional \$6,700 per year, or \$33,500 over the five years of the Program.

Details as to how this measure would be implemented were not included, but should be provided to the Commission before implementation. No evaluation component is included in the program.

4. Rain Sensor Retrofit. UWI would sponsor periodic rain sensor giveaways at regularly held community events where UWI has an exhibition booth. Rain sensors respond to precipitation by delaying one or more cycles in an automatic sprinkler system. Installation would be the responsibility of the homeowner. The goal is to distribute approximately 8,000

sensors over five years. The annual budget for this program is \$35,600, or \$178,000 over five years.

Details as to how this measure would be implemented were not included, but should be provided to the Commission before implementation. Staff is particularly concerned about the installation rate of sensors that are provided for free. No evaluation component is included in the program. A method of monitoring and evaluating this measure should be developed and refined before any sensors are distributed so that all information required to track sensor use and conduct the evaluation is obtained from the customer at the time the sensors are distributed.

5. Trigger Shut Off Valves and Hose Timers. UWI would offer incentives, such as a voucher on the purchase of a shut-off valve or timer. The devices would also be distributed free of charge at community events, targeted to customers that water manually by hose. These customers would not be eligible for a rain sensor, because they do not have automatic sprinklers. The goal is to reach 10% of residential customers over a five-year period. The annual budget is \$6,900, for a five-year total of \$34,500.

Details as to how this measure would be implemented were not included, but should be provided to the Commission before implementation. The same evaluation concerns stated in the section on rain sensors would also apply to these devices.

6. Award Program for Businesses. UWI would sponsor a periodic awards program for businesses that significantly reduce water use. The goal would be to involve three businesses every year *or so*. The annual budget for this program is \$1,300, for a five-year total of \$6,500.

Details as to how this measure would be implemented were not included, but should be provided to the Commission before implementation. No follow-up evaluation is proposed as part of the program.

7. Restaurant Low Flow Spray/Rinse Nozzles. This program would provide for the free installation of low flow spray/rinse nozzles used in the rinse and clean operations by restaurants, grocery stores and commercial kitchens. The installation would be done by a contractor and would target only older restaurants, as all nozzles in newer restaurants must be low flow. The goal is to install 1,000 nozzles over five years. The annual budget would be \$40,900, for a five-year total of \$204,500.

This is the type of program the Company should be looking to implement in all sectors. Because installation is part of the program, there is no question about the percentage that will

eventually be installed or used, unlike the other giveaways. By conducting the program in a high volume, short time frame, costs are kept low and benefits are maximized.

Staff suggests the Central District Health Department as a potential partner or contractor for this program. The District's Environmental Health Specialists visit every restaurant and grocery store in Ada County on a regular basis.

PLANNING PROCESS

In Staff's opinion, the planning process, under the direction of the Company's consultant, Maddaus Water Management, appeared to improperly eliminate many options that should have been more fully considered. The consultant identified a total of 91 potential conservation measures/programs that were considered in the initial screening process. Because of the identification of essentially the same conservation measures in multiple customer categories (single family residential, multi-family residential, commercial and public customers), the actual number of programs was significantly less than 91. The included measures addressed all classes of customers and essentially all of the current water conservation technologies, providing a reasonable mix.

In the screening process, each of the 91 measures was ranked by a planning group that included five representatives from UWI (including senior management), a single representative from both Idaho Rivers United and the Commission Staff, and Mr. Maddaus. Each measure was ranked on a scale of one to five in four separate areas: (1) the maturity of the technology, (2) the match between the measure and UWI's service area, (3) the probable customer acceptance and equity between customers, and (4) the legal authority of UWI to implement the effort. While each participant was provided a ranking sheet for his specific opinion, each measure was discussed by the group for each ranking area, typically resulting in a consensus score. While participants were free to enter a ranking other than the consensus score, that did not appear to be the norm.

This process was highly subjective, in many respects reflecting the personal preference of the group participants. Mr. Maddaus participated in the discussions, but primarily to explain the technology and measures.

The results from this screening process were not actually determined during the first phase of the process, but were calculated at a later date by Mr. Maddaus and presented to the participants at the second stage. Seventy-four of the 91 measures were eliminated through this

subjective screening process, with only the remaining seventeen considered in the second phase. Measure savings and costs were not considered in the screening process, but were developed in the second phase, so this information has not been calculated for the 74 measures eliminated in the initial screening process.

Thirty-four measures with scores that were within three points (out of a possible 20) of most of the surviving measures were eliminated in the screening process. That is twice the number of measures that survived. Given the subjective nature of the screening process, the difference of three points appears to be insignificant and somewhat arbitrary as a point of elimination. Staff believes many of these measures merited further evaluation on a more objective basis. While the range of programs passing the screening appeared to be acceptable, nearly all of the measures with savings that could be objectively quantified were eliminated in the second stage, leaving primarily educational programs that are notoriously difficult to evaluate in terms of actual savings.

SAVINGS ESTIMATES

Mr. Maddaus provided estimates of the savings and costs anticipated for each of the seventeen measures that survived the screening process. Although Staff believes the estimates provided are adequate for this planning purpose, evaluation of program results is required to determine whether the programs are cost effective.

Estimating savings from a conservation program is a difficult and imprecise process under the best of conditions, but is especially so for educational and public information programs. It is difficult to determine the number of real customers exposed to the information, the number of customers that actually implement a particular conservation measure, and the amounts of water actually saved, resulting in uncertainty of the program's effectiveness. Billing records are typically not reliable indicators of the impact of educational programs, as the level of expected savings is relatively small and is overwhelmed by natural variations in usage caused by weather, increases in numbers of customers, economic and other factors.

The most reliable estimates of educational programs are based upon surveys of customers who received the promotional materials and a control group to estimate the percentage of participants that actually take the actions being promoted. Significant concerns about these estimates include the accuracy of the survey responses, and the persistence of the savings from measures that rely upon customer actions rather than hardware. In most cases, the cost of such

an evaluation significantly exceeds the amount spent for the program, and thus even this imprecise evaluation is not conducted. Historically, most educational program evaluations have been based on the number of participants in the educational efforts or other factors that are at least one step away from actual water saving actions.

Nonetheless, the fact that evaluation might be difficult does not mean none should be attempted. As will be discussed in the section on evaluation, Staff believes that a more rigorous evaluation, including at a minimum, some method of determining actual implementation rates, is necessary to demonstrate the Company's conservation activities have been effective.

COST ESTIMATES

The procedures for developing cost projections for conservation program proposals are relatively consistent within the industry and the estimates provided by Mr. Maddaus for each of the surviving measures is within the range of costs reported by other utilities implementing similar programs. Staff believes the cost estimates provided by Mr. Maddaus to be reasonable for use in the process of selecting which measures to include in the Plan.

However, at the time Mr. Maddaus prepared plan cost estimates, the actual mix of program measures to be implemented were unknown. Consequently, Mr. Maddaus' cost estimates do not appear to reflect any savings resulting from shared resources, especially administrative resources, used in implementing measures that are similar in nature to others selected for implementation or combined with existing efforts. While it is appropriate to exclude such savings before the mix of plans is determined, it is reasonable to expect such savings in the implementation of the Plan.

As many of the measures included in the Plan are expansions of existing efforts, Staff would anticipate many overlapping tasks among these programs and significant opportunities for resource sharing. Efficient management of these efforts should result in considerable cost savings.

COST/BENEFIT RATIOS

Along with cost and savings estimates for each surviving measure, Mr. Maddaus provided two cost/benefit ratios. One ratio looks from the utility perspective, and only compares the costs incurred and benefits received by the utility. The other ratio looks from a society in general perspective, and includes costs incurred and benefits received by all parties. This is

similar to the URC (Utility Resource Cost) and TRC (Total Resource Cost) calculations used by the electric and gas utilities in developing their conservation plans.

The resulting value is determined by a complex model that computes the value of savings and costs expected over the projected lifetime of the conservation actions that are taken in response to the utility's efforts. All future amounts are discounted to reflect the difference between the time the expenditures are incurred and the savings achieved. As proposed, the economic model utilized a real interest rate of 3.5%. This interest rate is the result of adjusting an assumed nominal interest rate of 6.6% and an assumed inflation rate of 3%. Staff believes the parameters for determining the net present value of future costs and benefits considered in this case are reasonable. Table A in Attachment 1 shows the values produced by Mr. Maddaus.

The value of the savings is based upon the costs the utility does not incur due to the reduction in the amount of water required, or the Company's marginal cost of water. This includes any savings in operational costs due to the lower volumes, as well as any capital costs avoided by the Company due to water conservation. In UWI's case, the anticipated reduction in operational costs is small (\$103.80/million gallons), and the Plan identified the other cost savings as the value of a delay in the drilling of new wells and/or expansion of water treatment facilities planned to accommodate future growth in the Company's service area.

Marginal costs are typically calculated based upon the full cost of future production facilities, not just the value of a delay in their construction. Limiting the potential savings to the value of a short delay in the construction of treatment facilities resulted in a cost benefit ratio that is approximately 1/10 of the marginal cost ratio obtained for similar measures identified in the Water Conservation Potential Assessment prepared by the water utility of the City of Seattle.

Staff believes this method of evaluation is inappropriate. The use of such a methodology reduces the value as compared to additional facilities that would otherwise be needed to do the same job. Customers will certainly feel the full cost impact of supply side options in their bills if load grows as predicted. They should also see the full cost savings if some of that load growth is served by less expensive demand side options. Staff believes the full cost of the most expensive supply options planned by the Company to serve new water demands should be used in valuing water conservation if conservation provides a portion of that new demand.

EVALUATION

While the Plan indicates there will be some effort to evaluate the effectiveness, it does not specify how or what will be done, nor does it provide a budget for evaluation. The Plan mentions the high expense of effective evaluation for the types of programs included in the Plan more often than it mentions any attempts to actually conduct an evaluation.

Staff is aware of the costs of evaluation efforts for conservation expenditures, but is also cognizant of the importance of such evaluation when expenditures are used for acquiring conservation, as a resource for meeting future needs. It is unlikely that UWI would spend the amount of money required to drill a well without verifying the amount of water that it actually produces. Prudent management requires a comparable level of verification when expenditures for conservation are made to meet future needs.

At a minimum, Staff would expect the Company to conduct surveys of a representative sample of participants in all of its programs to determine the actual conservation actions taken by the participant. The information provided by the participant should be sufficient to estimate the expected water savings of the program. For example, for evaluating savings from free rain sensors, the information would probably need to include whether the sensor was actually installed, as well as the amount of area irrigated by an automated sprinkler system controlled by the sensor, the frequency and duration of watering cycles and verification that the system uses potable water supplied by UWI.

PARTNERSHIPS & GRANTS

The Plan frequently mentions the use of partners and/or grants, both as a means of reducing UWI expenditures, but also for increasing the effectiveness of the conservation efforts. Staff supports the use of partners and agrees that they often increase the effectiveness of utility efforts.

RATE DESIGN

The Plan did not examine rate design options as a means of achieving conservation, although tiered rate designs are a common element in many conservation efforts. Staff and the Company are currently considering rate design issues in the context of monthly, rather than bi-monthly billing. Accordingly, this issue will be addressed in another forum. Staff notes that the Consultant recommended monthly billing in the Plan.

HOOKUP AND CODE REQUIREMENTS

The initial 91 measures included a number of measures that involve restrictions on the sale, purchase and/or use of non-conserving devices or landscaping, some imposed by the local or state government, and others imposed as a hook-up requirement by the utility. None of these measures survived the screening process, typically ranking low in both consumer acceptance and legal authority. While Staff agrees that UWI lacks the authority to impose or change government codes and requirements, and such codes and requirements can be controversial, that does not preclude the Company from proposing and supporting such changes when considered by the entities that do have the authority. In addition, including conservation requirements in developer agreements should also be considered. These could include turf requirements in subdivisions and requirements for water efficient landscaping of model homes and common areas.

PROGRAM FUNDING AND CONSERVATION RIDER

Staff has supported the use of conservation riders or surcharges to fund conservation acquisition efforts for other utilities. Riders can reduce utility reluctance to fund conservation efforts and help provide conservation programs with stable budgets at times when utilities have imposed severe cost saving measures on other utility expenditures. Staff does not support, however, a rider to fund a conservation program composed of primarily public information and educational efforts. The savings are too speculative and the expenditures typically insufficient to justify a rider. Riders are appropriate when the expenditures are expected to change significantly from year to year or ramp up quickly. When expenditures are expected to be stable, such as the ongoing cost of an education and public information campaign, there is no need for a rider, as recovery through rates is adequate.

In addition, there is considerable overlap between the existing program and the new measures recommended for funding through a rider. Four proposed measures are simple expansions of existing efforts, and two residential measures (rain sensors and hose valves or timers) primarily involve providing items to give away at public events that the Company would already participate in under the existing program plan and budget. The details provided by the Company do not sufficiently delineate between what would be covered under existing efforts and what would be considered new. Although the Company has developed accounting procedures to record efforts and expenditures under the existing program separate from those recommended in

the new Plan, these efforts will likely involve the same staff at the same events working on elements of both the existing and expanded measures. Keeping the allocation of costs accurate will be difficult and time consuming. Funding through rates will simplify and reduce this administrative burden. In the alternative, Staff would support deferral of excess water conservation costs for later recovery upon a showing that the programs were effectively delivered and evaluated.

FINANCIAL RECORD KEEPING & AUDITING

Staff reviewed the Company's responses concerning the accounting treatment of the proposed surcharge amount of 0.33%. This review included the following areas of concern:

1. Reconciliation of funding for the rider account to ensure no redundancy of expense treatment between expenditures currently included in rates and new expenses associated with the rider account.
2. Amortization amounts, if any.
3. Cost effectiveness of the proposed Conservation Program.
4. Balancing account identification numbers including titles and sub-account numbers.
5. Accounting procedures that will be utilized to track Conservation Plan Income and Expenses.
6. Billing examples of the proposed Conservation Surcharge.

The Company provided Staff with the Conservation Surcharge Balancing Account (Sub-account 242-26), as well as a generic outline of the procedures to be used to reconcile and track expenses and income related to this sub-account. Staff requests that the Company demonstrate, if and when the Plan is augmented regardless of the funding mechanism, it is adequately reconciling expenses between those expenses currently included in rates and new expenses associated with the new Conservation Plan. Staff believes that the potential for abuse in this area could be significant. Therefore, Staff requests that the Company provide Staff with a detailed schedule of sub-account numbers and titles after the detailed sub-accounts for each program are established. Staff can then use this information in its audit of the sub-accounts after one year of operation to verify that proper reconciliation is taking place. Staff believes sufficient information has not been provided to currently enable such verification.

GENERAL COMMENTS

The total annual cost of continuing the Company's existing conservation efforts (\$124,000) plus the new measures (\$120,000) would be \$244,200. The total annual savings from the entire Plan, which would be implemented over five to ten years, is estimated as less than 2% of current annual consumption. Implementation of the Plan would not significantly reduce the projected growth in peak day usage, which is expected to grow by over 48 Million Gallons per Day (MGD). The total reduction in average daily usage is estimated at only 0.71 MGD.

As a point of reference, Staff refers to the City of Seattle's Water Conservation Plan, which is designed to reduce total demand by 1% a year for the ten years covered by the Plan, for a 10% reduction in total use. This is after having already captured significant savings, as an aggressive conservation effort initiated in 1990 had already reduced per capita consumption by 20%. Seattle's Plan is designed to meet 100% of the projected growth in demand over the ten-year period.

Based upon the utility benefit/cost ratio and the Cost of Savings identified by the Company in Table 6-2 of the Plan, Staff calculated the marginal cost of water used in developing UWI's Plan to be approximately \$225 per million gallons (\$/MG). Seattle's plan includes a number of programs that are similar to those eliminated by UWI in its initial evaluation process, including those with a cost of savings estimated to be over \$2,800/MG. While Seattle's marginal cost of supply side options may be higher than that of UWI, it is clearly not more than ten times higher. All but three of the eliminated programs would have qualified with a marginal cost of \$1,250, well below the reasonable marginal cost of UWI's Columbia water treatment plant.

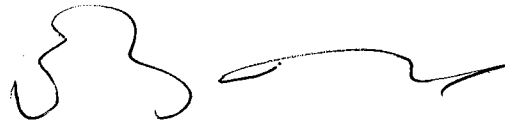
The Company asserts in the Plan that it does not face a water supply problem or a shortage of water. While Staff agrees the Company's situation is not a crisis, such as that faced by water utilities in Southern California or other areas of the Southwest, Staff does not agree that the Company is not facing limits in the availability of water. At the very least, the costs of acquiring new water supplies could be very high.

The Company recently constructed the Columbia treatment plant. The 2006 Master Plan identifies additional facilities that will most likely be even more expensive. The value of conservation resources should be based on avoiding or replacing a portion of these costly supply side options. If properly valued, other more objective conservation measures could be implemented to complement the subjective informational programs proposed by the Company.

STAFF RECOMMENDATION

1. The Company should continue the existing conservation efforts and implement the measures proposed in the Plan. The Company should work with Staff to further refine the details of program design and implementation and in the development of procedures to better evaluate results.
2. The Company should re-evaluate the more objective program measures using the full supply side avoided costs to establish the value of savings.
3. The Company should use informational programs in support of objective programs. Where appropriate, implement focused pilot programs to refine program operational details and demonstrate the savings of objective measures.
4. The Company should pursue water saving code improvements, developer agreements and hook-up requirements to conserve water.
5. The Commission should reject the proposed conservation tariff rider, and instead authorize deferred accounting treatment of the additional costs for later demonstration of reasonableness.

Respectfully submitted this 23rd day of February 2007.



Weldon B. Stutzman
Deputy Attorney General

Technical Staff: Wayne Hart
Tom McKeown
Michael Darrington

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Table A

Cost/Benefit Ratios of Conservation Measures

from the

United Water Idaho Water Conservation Plan

Measures Included in Plan	Utility Benefit Cost Ratio	Total Benefit Cost Ratio	Annual Average Water Savings (MGD)	Cost of Savings per Unit Volume (\$/MG)	Total Cost 30-Year Present Value	Average Annual Cost, First 5 years	First 5-year Utility Cost
Additional Xeriscape Demonstration Gardens	1.46	0.12	0.0801	\$115.52	\$104,800	\$17,400	\$87,000
Continue/Expand WELs	1.79	0.08	0.1448	\$105.98	\$174,800	\$11,200	\$56,203
Residential School Education	0.42	1.05	0.0246	\$424.18	\$118,200	\$6,700	\$33,722
Rain Sensor Give-away	0.96	0.4	0.1286	\$213.22	\$310,500	\$35,600	\$178,120
Trigger Shut-off Valves & Hose Timers	1.1	1.1	0.238	\$233.98	\$63,100	\$6,900	\$34,490
Award Program For Businesses	1.01	0.08	0.0165	\$113.92	\$21,300	\$1,300	\$6,697
Restaurant Low Flow Spray/Rinse Nozzles	0.85	49.96	0.1191	\$127.73	\$172,200	\$40,900	\$204,514
Eliminated Measures							
Residential Water Surveys	0.18	0.38	0.639	\$1,016.93	na	na	\$209,850
Smart Irrigation Controller Rebates - Single Family	0.13	0.1	0.1177	\$1,240.45	na	na	\$699,556
Smart Irrigation Controller rebates - Multi-family	0.26	0.23	0.1197	\$600.16	na	na	\$368,271
New Home Efficiency Award	0.18	0.02	0.0721	\$819.08	na	na	\$173,786
Landscape Replacement Rebate	0.13	0.07	0.1283	\$1,572.15	na	na	\$2,713,319
Rebates for super conserving toilets	0.08	0.05	0.2889	\$1,223.95	na	na	\$2,626,514
Commercial toilet replacement	0.1	0.04	0.1449	\$1,116.09	na	na	\$1,292,815
0.5 gal flush urinal rebates	0.06	0.02	0.0133	\$1,824.55	na	na	\$169,499
inefficient water using equipment replacement	0.03	0.49	0.0084	\$2,897.56	na	na	\$111,512
Landscape Water Budgets	0.38	0.27	0.0714	\$498.07	na	na	\$118,374
Irrigation upgrade rebates	0.33	0.18	0.0681	\$598.01	na	na	\$284,496

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 23RD DAY OF FEBRUARY 2007, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. UWI-W-06-05, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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SECRETARY