

**DEPARTMENT OF WATER RESOURCES**

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(916) 653-5791



October 2, 2012

Ms. Nancy Patton, Acting Executive Director  
Commission on State Mandates  
980 9th Street, Suite 300  
Sacramento, California 95814

Test Claim No. 10-TC-12 "Water Conservation Act of 2009"

Dear Ms. Patton:

The Commission has graciously granted several extensions for this test claim, one to the Department of Finance and three to the Department of Water Resources. The most recent extension's deadline is October 8, 2012. The Departments of Water Resources and Finance seek another extension for several reasons.

Both departments have been unable to fashion a timely response given the scope, breadth, and complexity of the issues the test claim raises. The test claim involves four separate agencies potentially requiring an independent response to each claim, including extensive background and research. This alone has lead to an unexpected and inordinate commitment of agency resources. The statutes and regulation at issue apply to over 500 urban and agricultural water suppliers state-wide, including the claimants. And as I have stated in prior requests, workload and competing priorities have made drafting a timely response difficult.

The Departments of Water Resources and Finance would very much appreciate another 60-day extension by the Commission to December 7, 2012. I look forward to your prompt response since the deadline is approaching.

If you have any questions or need additional information, please contact me at (916) 651-0874 or [skenner@water.ca.gov](mailto:skenner@water.ca.gov). Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Spencer Kenner".

Spencer Kenner  
Assistant Chief Counsel