



MEMORANDUM

CF/40-0-1 Water Conservation Plans and Programs (ID 807)

DATE: July 13, 2020
TO: Technical Advisory Committee
FROM: Paul Piazza, Principal Programs Specialist - Water Use Efficiency
SUBJECT: Water Conservation Statewide Framework Update Report for July 13, 2020

The following is an update on recent activity for the water conservation legislation workgroups formed by DWR, as well as information on related current public rulemakings associated with the Statewide Framework. As a note, CalWEP is doing a really good job maintaining current documents and other information on their website about recent workgroup meetings, public rulemaking proceedings, and water industry input to these processes. This content is available online to CalWEP members at <https://calwep.org/my-calwep/framework-hub/>.

Workgroup Updates

1. **Wholesale Water Loss** DWR's final report for recommendations on urban wholesaler water loss reporting was submitted to the Legislature in May. The report included five recommendations:
 - a. Require wholesalers to submit annual water loss audits matching the same schedule as retailers.
 - b. Direct DWR to prepare a water loss audit form specific to wholesale water loss reporting.
 - c. Require wholesalers to submit a comprehensive meter inventory list with the annual audit.
 - d. Direct DWR, with industry input, to complete a study of large-meter accuracy testing protocols.
 - e. Direct DWR to provide wholesaler training on the reporting process and BMPs for water loss control.

Next steps will require legislative bill sponsorship and no timeline for that is currently known. A copy of the DWR report is online at: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Water-Use-And-Efficiency/Urban-Water-Use-Efficiency/Validated-Water-Loss-Reporting/Final-of-Wholesale-Water-Loss-Legislative-Report_Feb-18-2020_a.pdf?la=en&hash=AD374ADEEB61255429E985BF13E2919B76295572

2. **Water Use Studies** Next meeting will be held remotely on Zoom on July 23, 2020 at 9am-11am. Meeting topics for the Indoor Residential Water Use Study include an overview of the study scope, sampling strategy, and approach to the monthly, hourly, and end-use

disaggregation analyses that will be used to develop estimates of baseline indoor residential water use.

3. **Standards, Methodologies and Performance Measures** There's been no activity or contact by DWR for this working group.
4. **Urban Water Management Plan Guidebook** DWR hosted an in-person workshop in Sacramento on March 10. Release of the 2020 UWMP guidebook is planned for Fall 2020.
5. **Annual Water Supply and Demand Assessment** DWR hosted an in-person workshop on March 9 in Sacramento. DWR is soliciting agencies to conduct Water Supply and Demand Assessments for voluntary interim reporting of Water Supply Shortage Reports by July 1, 2021 to help inform DWR's reporting process in advance of the first mandatory report due July 1, 2022. To that end, ACWA formed a Voluntary Interim Working Group to develop and pilot test a reporting tool and process. The tool was introduced to working group members at a May 21 meeting. Sonoma Water staff has had initial discussions with City of Santa Rosa staff coordinating the retailer UWMP demand analysis, about plans to collaborate on an approach for voluntary interim reporting as part of the joint preparation of 2020 UWMPs.
6. **Data Streamlining** There's been no activity or contact by DWR for this working group.
7. **Landscape Area Measurement** The second quarter meeting was held on June 3, 2020 and included a panel of workgroup members to provide comments on the pilot DWR residential parcel classifications proposed for use to aggregate irrigable landscape area. Panelists represented agencies from four regions of the state (NorCal Coastal, Northern Montaigne Hills, South Valley, South Coastal). Q&A followed based on concerns raised by panelists, and a presentation followed by DWR's consultant Quantum Spatial to explain the validation process used for the aerial interpretation of residential parcel classifications.

DWR stressed the need for agencies that have not responded to DWR for verification of water agency service area boundaries to do so, and also for agencies to reconcile any significant differences between their residential customer accounts and local county land use codes being used by DWR to identify residential parcels. Residential water service to parcels not zoned residential based on land use codes will be excluded from DWR's analysis. DWR is on-track to provide aggregate and parcel level data to all water suppliers by January 2021. The next quarterly meeting is scheduled for August 20.

In a related update, one of Sonoma Water's retailers reports being contacted by DWR's consultant Eagle Aerial, who is building out the online portal for disseminating service area parcel data for irrigable landscapes. Eagle Aerial is reaching out to all urban retailers in the state to schedule training on how to access the Landscape Portal. Agencies are being encouraged to have their GIS person on the training call.

Framework Public Rulemaking Updates

1. **Urban Retailer Water Loss Standards** A public stakeholder meeting was held on May 13 to provide a detailed overview and an opportunity for stakeholders to provide input on the latest proposed regulatory framework and draft economic model to calculate volumetric performance standards for water loss. Revisions include:
 - a. Removing the requirement for component analyses
 - b. New requirements for data requests related to apparent losses (meter testing, etc.), asset management practices, and pressure management by 2024.
 - c. New off-ramp provision for retailers with low levels of water loss equal to or less than 10 gallons per connection per day on a three-year average basis by 2028, and meeting proposed data quality standards by 2022.
 - d. Revised draft economic model for calculating volumetric standards.

A coalition letter (ACWA, CMUA, AWWA, CWA, and RWA) was subsequently submitted to the State Board on June 12 providing the following requests:

- a. Changes to the implementation timeline to ensure higher data quality is used when setting standards.
- b. Off-ramps that are achievable for suppliers with low water loss (20 gal/con/day).
- c. An independent peer review of the economic model by subject matter experts in the areas of economics and water loss.
- d. Inputs and assumptions in the model accurately reflect the true benefits and costs associated with leak detection and intervention.
- e. A variance process that recognizes existing efforts by suppliers in controlling water loss and their unique system characteristics.
- f. Removal of voluntary and mandatory questionnaires, which will expand the scope of the water loss proceeding beyond the Board's authority granted in SB 555.

REMINDER: Starting with this reporting year, the timeline for annual water loss reporting to DWR has been extended from October 1 to January 1 of each year for agencies filing on a fiscal year basis (AB 1414). Calendar year filers must still report by October 1.

2. **Monthly Conservation Reporting** The SWRCB adopted permanent monthly water use reporting requirements for retail water providers at their April 21 meeting. The regulation has been submitted to the OAL for review, with an effective date of October 1, 2020. The adopted regulation includes a change to the monthly reporting deadline to the 28th of each month for reporting of the previous month's water use data.