Water Loss Regulation Overview

• Senate Bill 555
  – Validated AWWA Water Loss Audits
  – Performance Standard
• Senate Bill 606/Assembly Bill 1668
  – Water Loss is part of each agency’s water budget
• Reporting
  – Starts in 2023 for 606/1668
    • Enforcement begins in 2024, fines in 2027
  – Already started for 555
    • Additional water loss standard reporting starts in 2024
Regulation Timeline

• Comment period - now until May 26th
• SWB has a chance to make revisions based on comments
• Formal rulemaking begins - June 2020
• What happens during formal rulemaking?
• Expected adoption - November 2020
Major Components

- Economic Model/Supplier specific targets
- Questionnaires
  - Apparent Loss (meter testing)
  - Pressure Management
  - Asset Management (pipe replacement)
- Off ramps for low loss/high data quality agencies
- Adjustments until 2022
- Compliance Range starts in 2028
  - 5 gallons per connection per day
Major Concerns

- Technical and feasibility issues
- Uncertainty in the economic functionality of the model
- Only accounts for leak detection and repair costs
- Defaults are not representative, hand selected
- Can agencies provide their own data?
- Off ramps not viable option
- Additional time for adjustments
- Questionnaires = future regulation?
Next Steps

• Each agency should review the docs and model
  – Will this work? Why? Why not?
• Submit comments! Deadline is May 26th @ noon
  – Be specific to your agency
• RWA is submitting comments
• RWA is coordinating with CA NV AWWA, ACWA, and CMUA
• Just the beginning…
  – Formal rule making begins in June
  – More opportunities to comment and influence the process