



Water Loss

May 14, 2020

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

