January 21, 2019
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Mr. Francisco Guzman
California Water Plan Update 2018
Strategic Water Planning Branch
Statewide Integrated Water Management
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94286-0001

Subject: Comments on the California Water Plan Update 2018

Dear Mr. Guzman:

The Municipal Water District of Orange County appreciates the opportunity to provide comments on the California Water Plan Update 2018 and specifically on the December 2018 supporting document titled “Sustainability Outlook Indicator Descriptions and Methodology.” The nature of our comments focus on the Factual accuracy of Healthy Economy 3: Distribution System Leaks and Losses. The characterization of distribution system water loss is outdated from current industry distribution system water loss standards, references non-validated and dated water balance results, and fails to acknowledge the reporting, validation, and volumetric water loss standards setting framework established through the adoption of Senate Bill 555, which was signed into law in 2015. The content of HE 3 needs updating to reflect this framework and acknowledge industry standards and current terminology surrounding distribution system water loss.

The following includes language contained in the supporting document titled “Sustainability Outlook Indicator Descriptions and Methodology” with a specific focus on Healthy Economy 3: Distribution System Leaks and Losses followed by MWDOCs concerns and recommendations.

Leak detection is a necessary component to the management of water distribution systems, because lost water represents lost money and energy expended during treatment and pressurization.

We do not dispute this claim. However, it is important to note that leak detection is not the only method for water distribution system loss management and is not equally effective in all systems.
The target outcome for this indicator is zero distribution system leaks and losses, indicating no money or energy is wasted following treatment and pressurization of water.

A leak loss target of zero is inappropriate and unattainable. All pressurized water distribution infrastructure is susceptible to leakage and will leak in its lifetime. As a result, investing in leak management, leak repair, and infrastructure renewal with the unrealizable goal of zero leakage will waste ratepayer money.

Industry best practices advise that water utilities aim to achieve and maintain a cost-justified, sustainable volume of water loss in which the costs of leakage intervention are balanced with the costs of leakage. When a utility pays more to recover a unit of water than the water (and other associated costs) is worth, both the utility and the ratepayer are financially harmed. Because the value of water and the costs of intervention vary immensely across utilities, reasonable water loss control objectives and plans will also vary across utilities.

Scale: Regional
Data Sources: UWMPs; DWR Water Audit Manual
Data Availability: Type II
Metric: Volume of water lost in distribution systems
Screening Status: Watershed

We agree that the metric tracked and evaluated should be the volume of water lost in distribution systems to real (leakage) loss, as distinct from apparent (paper) loss. However, this metric is not actionable when tracked at the watershed scale. Water loss is an inherently local problem that should be evaluated and managed at the utility scale.

Furthermore, data collected by the Department of Water Resources pursuant to Senate Bill 555 requirements describes individual water loss performance for all retail urban water suppliers, so regional aggregation and evaluation is not necessary. Water loss data reported in 2015 Urban Water Management Plans is both unvalidated and out of date. Independently validated water balance data for each urban water supplier for 2017 and 2018 is available on the Department of Water Resources’s Water Use Efficiency data portal in the form of American Water Works Association water audits. For more information about this growing annual dataset, please refer to the Water Loss Technical Assistance Program final report:
A geographic representation of the spread of data may be possible if system locations are required as part of standard data collection.

As previously mentioned, validated water loss data is collected annually from each retail urban water supplier by the Department of Water Resources, as directed by Senate Bill 555. Therefore, system locations have already been attached to water loss data at a scale better suited for management than entire watershed regions.

Distribution systems with a high percentage of water loss may require a leak detection program or upgrades to existing infrastructure.

Water loss is not evaluated and tracked with percentage figures; tracking percent water loss is considered outdated and misleading, especially during drought. Water loss should be assessed in absolute volumetric terms (e.g., acre-feet) alongside economic considerations (e.g., the variable production cost of water). To acknowledge the varying sizes of distribution systems throughout the state, leakage is best described in gallons per connection per day.

In 2018, the Legislature enacted two policy bills – SB 606 and AB 1668 – to establish both the foundation and needed authorities for long-term improvements in water conservation and drought planning to adapt to climate change and the resulting longer and more intense droughts in California.

This recommendation ignores the water loss management strides recently accomplished through the Senate Bill 555 regulatory process. Senate Bill 555, passed in 2015, directs the State Water Resources Control Board to develop and enforce water loss objectives for urban retail water suppliers. The final stakeholder meeting to develop Senate Bill 555 water loss objectives is scheduled for early February 2019, after which a public comment period will open. Therefore, there is already a framework adopted by the legislature for leakage regulation that should take precedent.

Furthermore, the objectives framework that develops from Senate Bill 555 mandates will ultimately inform the budgets framework being constructed for the Executive Order “Making Water Conservation a California Water of Life,” thereby eliminating the potential for redundant or contradictory regulation.
Thank you for the opportunity to provide comments on this important document. Should you have any questions, please call me at (714) 593-5008.

Sincerely,

Joseph M. Berg
Director of Water Use Efficiency

Cc: Todd Thompson, California Department of Water Resources
    Max Gomberg, California State Water Resources Control Board
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