

California Municipal Utilities Association (CMUA)
 State Water Resources Control Board Summary of and Responses to the
 CMUA 2020 EAR Comment Letter dated September 9, 2020

CMUA Comment (summarized)	Water Board Position	Implementation Timeframe	Water Board Response
Provide the Basis or intended use of each question within the EAR survey	Yes	2020 EAR	The Water Board will be developing background information for specific eAR survey questions that provides an overview of how the data is used. This may be housed in a document external to the EAR.
Concerned with gathering data to inform future regulations	Disagree	NA	This is one of the core purposes of the eAR - to help inform regulations and program development.
Consider the technical feasibility and economic impact of questions, including whether water utilities gather the data to respond to a question.	Neutral	NA	The Water Board's technical reporting authority under section 116530 of the Health and Safety Code is not limited to information that water systems have previously collected or organized. The Water Board recognizes the need to balance information gathering with the impact to utilities.
Shutoff example of a mandatory question where utilities do not gather data. A zero response would skew evaluation of the data.	No	NA	Comment boxes for all eAR questions may not be necessary; however, the Water Board is open to specific suggestions on where additional comment boxes may be appropriate.
Low-income subsidy example of a question that most utilities cannot engage, and failure to respond implies utility is ignoring affordability concerns.	NA	NA	The 2019 responses to this question have already provided useful information to the Board. This question is for the water utilities who currently have the capacity to offer bill assistance to their low-income customers. About 475 water systems would need support in developing an affordability program when a statewide program becomes available. The drawbacks of removing this question would limit the water community's understanding about where help currently exist, since this question is not asked anywhere else besides this annual survey. Furthermore, it is the responsibility of the Water Board to understand water affordability through the AB 401 process and AB 685.

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Utilities do not maintain information on the occupancy of dwellings they serve.	Conditionally agree	NA	The Water Board expects and requires water systems to track and gather data associated with mandatory survey questions. For some survey questions, the Water Board may allow a water system to indicate that data is not collected, but the expectation is that the water system will begin collecting this data and will only be granted a limited grace period for reporting.
Coordinate data streamlining internally and with DWR and other agencies	Agree but not able to implement	TBD	The Water Board agrees with the need to increase streamlining, however this takes additional IT tools on a statewide basis with the development of an open data architecture. The EAR has been developed to improve the overall effort to report by using new functionality. Where feasible, the Water Board will make efforts to identify and gather data from other agencies.
Monthly conservation reporting - coordinate streamlining to incorporate into EAR	Yes	2021 EAR	The prefill function for Water Supply and Delivery may be able to be implemented from the Monthly Conservation Reporting dataset. However, all definitions must be aligned before this can be implemented.
Do not require wholesalers to report data already reported by retailers	No	NA	DDW intentionally collects both wholesaler and retailer information and differentiates the two.
Allow sufficient time for utilities to gather and review their data prior to submittal.	Agree	2021 EAR	The Water Board will be implementing a modular concept for the EAR to allow reporting of data in separate surveys that can be implemented across a broader timeframe. However, the reporting schedule will not change for the 2020 EAR.
Provide training on EAR questions and example answers.	Yes	2020 EAR	Yes, we will be providing guidance.
Consider FY reporting, since most utilities operate on a FY	Agree but not able to implement	TBD	The Water Board supports the concept of allowing FY reporting, however, it will take several years to be able to integrate this into our data usage models.

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Reword question on most common meter size for multi-family connections	Yes	2020 EAR	We will be removing eAR survey questions that ask about meter sizes.
Provide more options for response to question on the service connection fee for new construction.	Yes	2020 EAR	We will consider adding a comment box for further context.
Number of multi-family residential customers with outdoor irrigation meters leads to misleading data.	Yes	2020 EAR	The proposed 2020 eAR does not ask for this data.
Water Board does not have authority or responsibility to make determinations on rates set by utilities. It is a local decision.	Agree	NA	It is not the Water Board's intent to regulate rate structures for all water systems.
EAR does not accommodate utilities with allocation based rates.	Disagree	2020 EAR	Questions related to most common rate structure addresses allocation based rates. Furthermore, with the redesign, only relevant questions should be shown to that type of billing structure.
For data consistency, it is important that the question about water costs clearly requests the total cost (variable rate plus the fixed meter charge) of 6 (12, 24) units of water.	Yes	2020 EAR	Yes, the auto-calculation will include the fixed or base charge as well. If the auto-calculation is not accurate, the water system has the option to provide an alternative figure for this calculation.
Allow more options on question about billing cycles	No	NA	We recognize that water systems may have multiple billing cycles per customer. However, the Water Board is only interested in the most common billing cycle for residential and non-residential customers.
EAR should not ask questions about non-water related charges.	No	NA	Any questions in the rates and charges section that ask about non-water related charges is only meant to help determine how water bills are structure for water customers.

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Questions about conservation expenditures and tracking water savings not relevant.	Disagree	NA	Answering these questions is not mandatory. As part of the rulemaking process, the Water Board intends to use the best information available to inform environmental and economic impact analyses. By providing responses to these questions, Urban Retail Water Suppliers would be supporting that effort.
Allow null (non-zero) value option for numeric data	Conditionally agree	2020 EAR	Where appropriate, the Water Board will allow water systems to respond to survey questions with either a "Not Applicable" or "Data not collected." However, the Water Board expects and requires water systems to track and gather data associated with mandatory survey questions. For some survey questions, the Water Board may allow a water system to indicate that data is not collected, but the expectation is that the water system will begin collecting this data and will only be granted a limited grace period for reporting.
Provide more comment boxes linked to specific questions.	No	NA	Comment boxes for all eAR questions may not be necessary; however, the Water Board is open to specific suggestions on where additional comment boxes may be appropriate.