

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

CWA Comments (summarized)	Water Board Position	Implementation Timeframe	Water Board Response
CWA members report rates, revenue and expense information to CPUC. Water Board should obtain this info from CPUC to reduce duplicative reporting.	Agree but not able to implement	NA	While some of this information may be submitted to the State, it is not accessible to the Water Board in a machine readable format.
Or provide more time to submit this data (June 1)	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.
Supports concept of separate survey modules.	Agree	2021 EAR	No Response Needed. This is a concept Water Board has already informed EAR IF that we will implement.
Provide list of mandatory questions by 1/1/2021 to increase data availability and response rates.	Yes	2020 EAR	The Water Board will make every effort to make a list of mandatory questions available by January 1, 2021.
Identify in EAR how data is being used and metrics being calculated from the data.	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.
Continue to allow Excel file uploads for grid tables.	Yes	2020 EAR	This is part of the current design for the 2020 EAR.
Beta test Rates Section using utility volunteers.	Agree but not able to implement	TBD	The ability to use a small group of systems to beta test the EAR will require new functionality to enable a test environment across a secure connection outside the Water Board firewall. The Water Board does not currently have the ability to support this. However, we will continue to pursue this capability for future development.

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Add "This section accurately captures my agencies' water rates" to inform Water Board on how representative is the data collected.	Yes	2020 EAR	The Water Board may consider adding a voluntary comment box following the rate tables to allow water systems to indicate if there are any considerations the Board should be aware of.
Reduce number of rate related questions for SWSs.	Yes	2020 EAR	The Water Board intends for the new survey platform to incorporate functionality that will reduce the number of questions that water systems are asked based on their size and responses to previous questions. Furthermore, DDW will continue to refine eAR survey questions through internal review and feedback from the eAR Input Forum.
Have rate questions mirror tariff sheets for consistency and to reduce reporting burden.	Yes	2020 EAR	The new EAR functionality allows for customization of the rate table to better mirror individual water system tariff sheets.
Consider using percent values instead of absolute dollars (i.e., what percent of the annual budget is non-rate revenue).	No	NA	Percentage values are not as useful for data analysis compared to absolute dollars. Furthermore, absolute budget figures are needed for the Water Board's Need Assessment activities.
Also consider breaking out pass-through costs, like purchased water and power, in the expenses section.	Yes	TBD	Power cost is covered in B2.1 Total annual operations and maintenance expenses. Also, B2.4 Total Other Annual expenses and the corresponding comment box B2.a could be used to report purchased water cost.
Dividing costs by number of service connections ignores rate structure and may over represent the cost of residential customers	No	NA	The proposal for Table B1.9 column C suggests utilizing water service area population rather than number of service connections. Furthermore, the system has the ability to provide an alternative cost in this table if the auto-calculation is not accurate.