

**Los Angeles Department of Water and Power (LADWP)**  
 State Water Resources Control Board Summary of and Responses to the  
 LADWP 2020 EAR Comment letter dated September 9, 2020

<b>LADWP Comments (summarized)</b>	<b>Comment: Additional Details</b>	<b>Water Board Position</b>	<b>Implementation Timeframe</b>	<b>Water Board Response</b>
Consider changing the date due for submitting data that is not related to water quality reporting so that agencies can have additional time to collect and submit accurate data.		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.
Allow an option in the report to include data that is collected annually on a fiscal year cycle rather than on a calendar year basis.		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.
Eliminate duplicative reporting: The Water Board should coordinate with relevant state agencies to share information that we are already reporting to them.		Agree but not able to implement	NA	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.
Some Data Sets are not available and should allow for "N/A" as a response instead of forcing a numeric value. For example, the occupancy of homes during shut-offs or water delivered to parklands.		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.

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Provide context for each question within the report on how the requested information will be used.		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.
There are legal and privacy implications for providing certain information and details as is currently requested within the electronic annual report		No	NA	More specific information is required to adequately address this comment.

#### Question Specific Comments from LADWP:

No.	Comment	Comment: Additional Details	Water Board Position	Implementation Timeframe	Water Board Response
1	A.1.2 (Reveal if A.1 = Yes) Has your approved water rates (billing structure) changed from the previous reporting year? *	Specify which contents will be auto-filled. Even if billing structure is the same, other info may change.	Yes	2020 EAR	If the answer to the question is yes, the respondent will have to complete all of section A. The State Water will add clarifying language to signal this to the water system.
2	A.1.5 Please select any variances or factors used to determine or adjust residential water rates or allocations:	Add two more checkboxes: 1) climate zone; 2) season (summer/winter)	Yes	2020 EAR	The Water Board will consider adding a weather/climate checkbox to the list of variances and factors.
3	A3.6 a Select all applicable Non- Residential connection types:	Parks and golf courses are typically classified as Institutional or Commercial not "Landscape Irrigation." Also suggest to include "Recycled Water" as a connection type	Yes	2021 EAR	The Water Board disagrees with the with classifying golf courses and parks as commercial or institutional, but may consider adding recycled water as a connection type in the 2021 EAR.

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4	B. Total Income: Revenue & Expenses	General concern about what the information in this section will be used for and how it can be misconstrued. Need an N/A option for each question.	No	NA	This information is necessary for the Water Board's annual Needs Assessment. The Needs Assessment and the legislative authority to collect data necessary for it are outline in SB 200. The Water Board does not collect this information elsewhere for water systems in a machine readable format.
5	B1.3 (Reveal if A.2 = Residential or Both) Total revenue generated exclusivity from other fees and charges from all Residential customer types during the reporting year (includes single-family and multi-family customers).	There is difficulty separating out Water System from LADWP as a whole entity. LADWP operates water and power utilities and these items might not be tracked separately for only water. Need a way to provide comments to clarify response. What to report if these fees and charges are not tracked separately? Need an N/A option for this question because can't separate water only charges	Conditionally agree	2020 EAR	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.
6	B1.4 (Reveal if A.2 = Non-Residential or Both) Total revenue generated exclusivity from other fees and charges from all Non-Residential customer types during the reporting year.	See comment 5	Conditionally agree	2020 EAR	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.

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7	B1.6 Total revenue lost from interfund or governmental transfers (if \$0, enter \$0)	See comment 5	Conditionally agree	2020 EAR	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.
8	B1.7 Total revenue generated from non- customer sources that have not already been accounted for (i.e. cell towers, lawsuits and settlements, energy generation, land leases, etc.)*	See comment 6	Conditionally agree	2020 EAR	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.
9	B1.9 column D (previously A3.a – A3.c) Approximation of Total Residential Charges	This title is misleading as it includes sewer, trash, electric, etc. other chargers. Should be called “Total Utility Cost”. Suggest adding in comment here to note that form adds in these other costs. Or report only the water components for the questions above, if available.	Yes	2020 EAR	The approximation only includes charges that directly support drinking water services. The auto calculation does not include other costs that support other utilities. Clarifying language will be added to table B1.9 as well as question B1.6
10	C1.1.1 What is the average amount owned at the time of shut-off.	Need an N/A, can’t split out water only, even partial payment may still get shutoff. LADWP would like to further discussion with Water Board.	Conditionally agree	2020 EAR	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.

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11	C1.3 What is the median duration of the shut-offs (in days) for continuously occupied Residential/ Single Family & Multi-Family service accounts?	How do we know if the property is continuously occupied? Need an "n/a" or "unknown" option. Most agencies do not track this information	Conditionally agree	2020 EAR	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.
12	C1.7.1 [If yes] How many occupied Residential/ Single Family and Multi-Family customer accounts participated in your extended payment of other customer payment assistance plans?	We don't know if the property is continuously occupied? Need an "n/a" or "unknown" option.	Conditionally agree	2020 EAR	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.
13	C1.7.2 How many of the continuously occupied Residential/ Single-Family and Multi-Family customer accounts were shut off at least once during the year and were enrolled in an extended assistance plan at the time of the service disconnection?	We don't know if property is continuously occupied; need an "n/a" or "unknown".	Conditionally agree	2020 EAR	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.
14	C2.4 How is your low-income water rate assistance program funded?	Need an "n/a", option.	Conditionally agree	2020 EAR	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.

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15	C2.5 How much funding was allocated to your low-income water rate assistance program in the reporting year?	Need an "n/a", option.	Conditionally agree	2020 EAR	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.
16	D.5 Is your system an Urban Water Supplier with dedicated outdoor irrigation meters?	Need a clear definition of what is considered "dedicated irrigation" vs "landscape irrigation" vs. other commercial and institutional landscape water uses not specifically classified as landscape for billing purposes. To this point, might be premature to ask for this info before DWR completes guidance and methodology for this in 2020.	Yes	2020 EAR	The Water Board can provide some clarifying language on this question to help water systems better understand the differences.