

**Placer County Water Association (PCWA)**  
 State Water Resources Control Board Summary and Responses to the  
 PCWA 2020 EAR Comment Letter dated September 16, 2020

PCWA Comments (summarized)	Water Board Position	Implementation Timeframe	Water Board Response
Integrate and streamline data reporting as required under AB 1755 and WRP	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 SWB will make efforts to identify and gather data from other agencies.
Eliminate duplicative reporting, deleting Section B. Income: Revenue and Expenses	No	NA	This information is necessary for the Water Board's annual state-wide Needs Assessment. The Needs Assessment and the legislative authority to collect data necessary for it are outline in SB 200. The State Water Board does not collect this information elsewhere for water systems in a machine readable format.
The Financial Transactions Report (FTR) submitted to the State Controller, and Comprehensive Annual Financial Report (CAFR) are more comprehensive than EAR to assess a utilities financial health.	Agree but not able to implement	NA	While some of this information may be submitted to the State Controller, it is not currently accessible to the Water Board without development of tools to gather it in machine readable format.
Following questions are duplicative with FTR or CAFR: B1.1, B1.2, B1.5.2, B1.7, B1.8, B2.1, B2.2, B2.3, B2.4, and B2.5.	Disagree	NA	While some of this information may be submitted to the State Controller, it is not currently accessible to the Water Board without development of tools to gather it in machine readable format. The SWB will evaluate the information submitted to the SCO to identify the feasibility and whether the data submitted meets SWB needs.
Expansion of EAR should be necessary for implementation of SWBs regulatory (compliance) program only.	Disagree	NA	The Water Board is authorized by statute to require public water systems to report technical information to the board. (Health & Safety Code, section 116530) This statutory authority expressly extends to information on water systems' financial capacity and sustainability, and drinking water affordability and accessibility. It broadly applies to information that is related to achieving the human right to water in California. (subdivision (a)) The Water Board is therefore authorized to require public water systems to report information to the Water Board on water rates and system finances, shutoffs to customers, and low-income rate assistance programs

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Requiring reporting for datasets not available is an economic impact	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.
Utilities do not gather data on the occupancy of multi-family homes (example of economic impact)	Neutral	NA	For water systems that do not track occupancy for multi-family there is an option to enter the data in the unknown column of the tables in section C. This information is not necessary for completing the section.
Response options should include NA or No to minimize skewed data	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.
Include comment boxes for each question	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.
Rate setting is a local decision. EAR should not be used to assess financial health or establish a correct rate structure.	Agree	NA	It is not the Water Board's intent to regulate rate structures for all water systems. The Water Board has a legislative obligation to assess the financial health and resiliency of water systems which is why financial data is collected through the eAR.