

San Juan Water District (SJWD)
 State Water Resources Control Board Summary and Responses to the
 SJWD 2020 EAR Comment Letter dated September 16, 2020

SJWD Comments (summarized)	Water Board Position	Implementation Timeframe	Water Board Response
Limit data needed for SAFER to only those PWSs that meet the criterion for financial assistance under SB 200 (HSC 116768(a))	Disagree	NA	The eAR data utilized for the SAFER program assists the Water Board's identification of systems that should be prioritized for SAFER funding.
Water Board need for data for LIRA report is sunset	Disagree	NA	The Water Board is responsible for implementation of the Human Right to Water statute (Water Code 106.3), which sets goals of safe, clean, accessible, and affordable water for all Californians. The Board collects data on affordability, such as rates, customer assistance programs, and shut offs, to inform various ongoing efforts, including SAFER (SB 200), which requires the Board to establish an affordability threshold. Water affordability is a growing concern and solutions, including those proposed in the AB 401 report, require continual data collection on how the cost of water is impacting Californians.
Water Board has no authority to collect water rate/water bill data.	Disagree	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 Water Board does not collect this information elsewhere for water systems in a machine readable format.
TMF related data should be targeted only to those system not meeting HSC requirements.	Disagree	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 Water Board does not collect this information elsewhere for water systems in a machine readable format.
Water cost data is only needed every 5 years to satisfy requirement for update of the SDWPlan report.	Disagree	NA	The Water Board needs water cost data for its annual SAFER Fund Expenditure Plan. Specifically, this data is used for the Needs Assessment.
Water cost data could be collected in the Urban Water Management Plans.	Disagree	NA	Cost data needs to be collected in a machine readable format.

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Revenue & Expenses: Delete this Section. Water Board has no statutory or regulatory authority requiring collection of revenue & expense data.	Disagree	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 Water Board does not collect this information elsewhere for water systems in a machine readable format.
Financial information can be obtained from State Controller and via CAFR reports.	Agree but not able to implement	TBD	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.
TMF data should be collected only from those PWSs not meeting requirement of HSC using targeted orders.	Disagree	NA	Data collected through the eAR will help the Water Board identify water systems that are either not meeting or at risk or not meeting HSCs.
Affordability/Shutoffs: Delete all but question C1.1. Water Board has no statutory authority to collect any shutoff information other than question C1.1.	Disagree	NA	The State Water Resources Control 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 Board on water rates and system finances, shutoffs to customers, and low-income rate assistance programs
Water Board could retain question A4.j re: adoption and posting of shutoff policies and fees.	Disagree	NA	The question was needed for regulatory development in previous years, but is no longer needed. And therefore, the Water Board is deleting it.
Water Board has no authority over customer assistance programs. Delete Section C2 Residential Customer Assistance.	Disagree	NA	The State Water Resources Control 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 Board on water rates and system finances, shutoffs to customers, and low-income rate assistance programs