

State Water Resources Control Board  
 Response to Comments from the Electronic Annual Report (EAR) Input Forum  
 for the 2021 EAR

No.	Organization	EAR Section Number	Question/Comment/Suggestion	State Water Board Response
A1	East Bay Municipal Utility District	Section 17: Conservation	EBMUD General Comment/question for Section C.1.2: This section requires tremendous amount of time and effort to complete. How does this information help the State Board with overall conservation efforts? And how will the data each agency provided be used by the State Board? Clarification will help determine how best to provide the data needed to meet the State's objectives.	Since proposing the inclusion of a table to gather data related to conservation program activities and expenditures conducted by water systems, the State Water Board has met with stakeholders to refine the information to be gathered. It was decided to not include questions related to conservation activities and expenditures in the 2021 eAR. However, it is the goal to have a better understanding of conservation potential, as well as how conservation investments affect water use trends. The State Water Board will continue to work with stakeholders to develop appropriate questions to gather information related to such activities.
A2	East Bay Municipal Utility District	Section 17: Conservation	EBMUD Specific Questions for Section C.1.2: Number of times activity was completed – Unclear what this is asking. Is it asking for how many rebates were provided? if so, then please state it explicitly.	Since proposing the inclusion of a table to gather data related to conservation program activities and expenditures conducted by water systems, the State Water Board has met with stakeholders to refine the information to be gathered. It was decided to not include questions related to conservation activities and expenditures in the 2021 eAR. However, it is the goal to have a better understanding of conservation potential, as well as how conservation investments affect water use trends. The State Water Board will continue to work with stakeholders to develop appropriate questions to gather information related to such activities.

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A3	East Bay Municipal Utility District	Section 17: Conservation	EBMUD Specific Questions for Section C.1.2: Agency labor cost (\$/year) and Agency activity costs (excluding labor cost/yr.) – EBMUD does not have this level of detail on individual programs as there are many overhead costs associated the effort. EBMUD is able to provide labor costs for processing rebates and such, however, that task will require many hours of staff time and it will only be a very rough estimate. Can you clarify the goal of requesting the detailed information and how it will be used?	Since proposing the inclusion of a table to gather data related to conservation program activities and expenditures conducted by water systems, the State Water Board has met with stakeholders to refine the information to be gathered. It was decided to not include questions related to conservation activities and expenditures in the 2021 eAR. However, it is the goal to have a better understanding of conservation potential, as well as how conservation investments affect water use trends. The State Water Board will continue to work with stakeholders to develop appropriate questions to gather information related to such activities.
A4	East Bay Municipal Utility District	Section 17: Conservation	EBMUD Specific Questions for Section C.1.2: Agency activity costs (excluding labor cost/yr.) – Is this the monies for the rebate provided or all the other work surrounding a rebate?	Since proposing the inclusion of a table to gather data related to conservation program activities and expenditures conducted by water systems, the State Water Board has met with stakeholders to refine the information to be gathered. It was decided to not include questions related to conservation activities and expenditures in the 2021 eAR. However, it is the goal to have a better understanding of conservation potential, as well as how conservation investments affect water use trends. The State Water Board will continue to work with stakeholders to develop appropriate questions to gather information related to such activities.

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A5	East Bay Municipal Utility District	Section 17: Conservation	How should free give-a-ways like showerheads be handled as EBMUD does not rebate these as asked in the table to provide – where does an activity like that go in the table?	Since proposing the inclusion of a table to gather data related to conservation program activities and expenditures conducted by water systems, the State Water Board has met with stakeholders to refine the information to be gathered. It was decided to not include questions related to conservation activities and expenditures in the 2021 eAR. However, it is the goal to have a better understanding of conservation potential, as well as how conservation investments affect water use trends. The State Water Board will continue to work with stakeholders to develop appropriate questions to gather information related to such activities.
A6	East Bay Municipal Utility District	Section 17: Conservation	The question about water surveys – who will be reviewing the survey responses? EBMUD assumes it will be someone with adequate understanding about the process. And how will this data be used by the State Board? Again, this is to see how best to provide the data to meet the State’s objectives.	Since proposing the inclusion of a table to gather data related to conservation program activities and expenditures conducted by water systems, the State Water Board has met with stakeholders to refine the information to be gathered. It was decided to not include questions related to conservation activities and expenditures in the 2021 eAR. However, it is the goal to have a better understanding of conservation potential, as well as how conservation investments affect water use trends. The State Water Board will continue to work with stakeholders to develop appropriate questions to gather information related to such activities.
A7	East Bay Municipal Utility District	Section 17: Conservation	EBMUD Comment on Section B.3.1: Recommend modifying the question to say that the shortage level(s) should be based on the stage each utility has established in their 2020 Water Shortage Contingency Plan (WSCP), and the provide a place to note how cross references to the state’s shortage level.	The recommendation has been accepted and implemented for the 2021 EAR

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A8	East Bay Municipal Utility District	Section 18: Climate Change	Section 18 of EAR. Climate Change Adaptation and Resiliency for Water Utilities asks for detailed impacts to various components due to climate change. Clear definition needs to be shown on what the categories are implying. There should be an acknowledgement of horizon being considered in context of the questions which would provide insight into the responses. In addition, science on climate change and understanding the impacts is progressing and being updated and acknowledging and recognizing that is important; can be recognized by referencing studies last done and if any are under way or being planned. It's important that the visualization aspects of this questions have caveats/disclaimers as the information provided here is not consistent across utilities and not be used to make general conclusions or recommendations.	The State Water Board provides the following responses: 1) Definitions will be provided in the Help Tips. 2) The State Water Board is considering a 20-year time horizon as is used in the Urban Water Management Plan guidance. 3) There will be references to studies conducted and planned in the Help Tips. 4) The State Water Board recognizes the variable nature of the responses in this section and will consider that as it uses the data gathered via the EAR.
B1	California Department of Water Resources (DWR)	Section 6: Water Supplied and Delivered	I would suggest removing wholesale items in water production table (6.A1 – Water Produced, Purchased, and Sold) and only keep the wholesale items in water delivery table (6.B Water Deliveries). The reasons are that conceptually wholesale is “a type” of deliveries and it is appropriate to place it in the water delivery table. If the suggestion is adopted, the combination of the two tables, water production and water deliveries (6.A1 and 6.B), makes them more or less like a water balance table. One side shows quantity of water getting into a system, and other side shows quantity of water leaving the system. The two sides should be balanced if the storage part can be ignored. Arranging the two tables like a water balance table would make it easy to see if water production and delivery is balanced. The two unbalanced tables may prompt people to check if there is any error either in water production table or in water delivery table. Current arrangement of wholesale in water production table (6.A1 – Water Produced, Purchased, and Sold) makes it very difficult to fill the form for wholesale water suppliers if they sold non-potable water.	The State Water Board is collaborating with the Department of Water Resources to identify solutions to the concern about Column F in Table 6A.1.

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C1	San Juan Water District	General	San Juan Water District supports the collection of data by the State Water Resources Control Board that are necessary for the Board to exercise its statutory and regulatory responsibilities to ensure that public water suppliers provide safe drinking water supplies to residents of California. These comments are provided in the context of the direction provided by the Legislature to the Board to streamline data reporting, eliminate redundant data submissions and collect data that are related to regulatory requirements (Water Code Sections 10609(c)(4) and 10609.15).	Thank you for this comment/suggestion.
C2	San Juan Water District	General	These comments are also provided in recognition of the fact that not only does the preparation of the Electronic Annual Report require the expenditure of person hours and ratepayer funds at public water suppliers, but also expenses at the Board itself. These costs for the Board are associated with staff time both to review the data, as well as to assist small water suppliers in preparing and submitting the information in the first place. Consequently, the Board should judiciously select data elements that are only truly necessary to support the exercise of its regulatory authorities.	The State Water Board recognizes the need to balance information gathering with the impact to utilities. There is an effort each year to ensure that the information that is being gathered via the EAR is being used to support regulatory oversight and other mandated programs.
C3	San Juan Water District	Section 17: Conservation	The proposed questions in the proposed additional section concerning Water Conservation, Drought and Efficiency – Drought Preparedness section concerning water shortage contingency plans are unnecessary and redundant with the information that is contained in the Urban Water Management Plans and the associated Water Shortage Contingency Plans that were just submitted by water suppliers in the summer of 2021. Other information concerning water shortage levels and drought response actions are provided by water suppliers as part of monthly conservation reports that are submitted to the State Water Board, and will also be provided by water supplier via the annual water supply and demand assessment that will be submitted to the Department of Water Resources and to the Board, beginning in July of 2022. We recommend that Board staff use those documents as the source of this information, rather than requesting it be submitted again via the EAR. We recommend that this section be deleted from the EAR.	The State Water Board agrees with the need to increase streamlining. However, there is not yet a way to accurately cross-reference information across reports. Additionally, streamlining information both intra- and inter- agency takes additional IT tools on a statewide basis with the development of an open data architecture. The State Water Board welcomes the chance to partner with interested parties in the streamlining process.

No.	Organization	EAR Section Number	Question/Comment/Suggestion	State Water Board Response
C4	San Juan Water District	Section 17: Conservation	<p>The information requested in the proposed additional section concerning Water Conservation, Drought and Efficiency – Conservation section is already provided by water suppliers in the Demand Management Measures section of Urban Water Management Plans, as required by Water Code Section 10631. This information was most recently compiled and reported in July of 2021. Specifically with respect to the table of information requested in question C.1.2, our agency (and likely most other water agencies) does not track time spent by staff on individual conservation program elements, such as specific rebates, site visits, etc. Similarly, the equipment or contractual costs associated with individual actions is also not tracked. We do have information that we can provide concerning the annual total budget and expenditures for our water use efficiency program. We recommend that this section be deleted from the EAR.</p>	<p>Since proposing the inclusion of a table to gather data related to conservation program activities and expenditures conducted by water systems, the State Water Board has met with stakeholders to refine the information to be gathered. It was decided to not include questions related to conservation activities and expenditures in the 2021 eAR. However, it is the goal to have a better understanding of conservation potential, as well as how conservation investments affect water use trends. The State Water Board will continue to work with stakeholders to develop appropriate questions to gather information related to such activities.</p>
C5	San Juan Water District	Section 8A: Customer Charges	<p>We recommend that this section be deleted. The information that the Board is requesting concerning water rates and water bills is not directly related to any statutory or regulatory authority of the Board – the Board has no authority over water rates and charges established by public water suppliers. The information that the Board requested in 2018, 2019 and 2020 concerning water rates and charges (which constitutes almost 20% of the questions in the EAR) was not used by the Board in its 2020 Safe Drinking Water Plan. As noted, the Board has completed its reporting obligations pursuant to AB 401, so this information is not necessary for that purpose, either.</p>	<p>The State Water Board utilizes the financial data from Section 8 of the EAR in the annual Drinking Water Needs Assessment. This information is also utilized by the State Water Board for conducting benefit cost analysis for regulatory development; supporting new Programs like the Water and Wastewater Arrearage Payment Program; and new legislative proposals. This information is also utilized by other State agencies (Department of Water Resources, California Public Utilities Commissions, Department of Community Services and Development etc.) to inform funding allocation decisions for programs and state-wide data analysis.</p>

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C6	San Juan Water District	Section 8A: Customer Charges	If the Board needs specific information about the technical, managerial and financial status of public water suppliers that are not meeting the requirements of the Health and Safety Code to provide water that meets drinking water standards, the Board can avail itself of targeted information orders or requests for technical reports tailored to the specific questions it has for an individual public water supplier. Requiring such information generally through the EAR is unwarranted and unnecessary, and results in the expenditure of ratepayer funds that could be used to meet other regulatory requirements.	The State Water Board utilizes the financial data from Section 8 of the EAR in the annual Drinking Water Needs Assessment. This information is also utilized by the State Water Board for conducting benefit cost analysis for regulatory development; supporting new Programs like the Water and Wastewater Arrearage Payment Program; and new legislative proposals. This information is also utilized by other State agencies (Department of Water Resources, California Public Utilities Commissions, Department of Community Services and Development etc.) to inform funding allocation decisions for programs and state-wide data analysis.
C7	San Juan Water District	Section 8B: Income	We recommend that this section be deleted. The information requested in this section is not related to any regulatory or statutory authority of the Board, and thus is unnecessary to collect. Furthermore, all of this information is already provided by public water suppliers to the State of California, pursuant to the requirements in Government Code 53890 et seq. Should the Board desire to review the financial information provided by public water suppliers to the State Controller, it can avail itself of the extensive data provided both online and in the Comprehensive Annual Financial Reports from public water suppliers. All of the information proposed to be required in this section of the EAR is already available from these sources.	The State Water Board utilizes the financial data from Section 8 of the EAR in the annual Drinking Water Needs Assessment. This information is also utilized by the State Water Board for conducting benefit cost analysis for regulatory development; supporting new Programs like the Water and Wastewater Arrearage Payment Program; and new legislative proposals. This information is also utilized by other State agencies (Department of Water Resources, California Public Utilities Commissions, Department of Community Services and Development etc.) to inform funding allocation decisions for programs and state-wide data analysis.

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C8	San Juan Water District	Section 8B: Income	If the Board needs specific information about the technical, managerial and financial status of public water suppliers that are not meeting the requirements of the Health and Safety Code to provide water that meets drinking water standards, the Board can avail itself of targeted information orders or requests for technical reports tailored to the specific questions it has for an individual public water supplier. Requiring such information generally through the EAR is unwarranted and unnecessary, and results in the expenditure of ratepayer funds that could be used to meet other regulatory requirements.	The State Water Board utilizes the financial data from Section 8 of the EAR in the annual Drinking Water Needs Assessment. This information is also utilized by the State Water Board for conducting benefit cost analysis for regulatory development; supporting new Programs like the Water and Wastewater Arrearage Payment Program; and new legislative proposals. This information is also utilized by other State agencies (Department of Water Resources, California Public Utilities Commissions, Department of Community Services and Development etc.) to inform funding allocation decisions for programs and state-wide data analysis.
C9	San Juan Water District	Section 8C: Water Affordability	We recommend that these sections be deleted. These sections are unnecessary for the 2021 EAR, as water agencies in California were prohibited by Executive Order and statute from discontinuing water service to any customer, due to non-payment of water bills.	Questions in Section 8C that capture data related to shut-offs will be hidden and not mandatory in the 2021 EAR due to the year-long shut-off moratorium. These questions will be included in the 2022 EAR.



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C10	San Juan Water District	Section 8C: Water Affordability	Should the State Water Board consider requesting information on shutoffs in future EARs, that request should be limited to the information that is required to be reported by water suppliers to the Board pursuant to Health and Safety Code Sections 116906 and 116918, which pertain to a policy concerning discontinuation of service and the number of annual discontinuations for inability to pay, respectively. None of the information collected pursuant to the multiple pages of questions on shutoffs in the 2018, 2019 and 2020 EARs was used by the State Water Board in its 2020 Safe Drinking Water Plan for California. Furthermore, the State Water Board met its obligation to prepare a report on Low Income Water Rate Assistance pursuant to AB 401, so additional information on duration of shutoffs, number of times accounts are shut off during a year, the amount owed at the time of shutoff, sources of funding for assistance programs, etc. are not necessary for the Board to collect. Our agency does not track this information in our billing system. As the Board noted in the Safe Drinking Water Plan, the greatest concern about the technical, managerial and financial capacity of community water systems relate to those systems that serve fewer than 500 connections; however, those systems are substantially less likely to have the ability to compile and report this information.	The State Water Board utilizes the financial data from Section 8 of the EAR in the annual Drinking Water Needs Assessment. This information is also utilized by the State Water Board for conducting benefit cost analysis for regulatory development; supporting new Programs like the Water and Wastewater Arrearage Payment Program; and new legislative proposals. This information is also utilized by other State agencies (Department of Water Resources, California Public Utilities Commissions, Department of Community Services and Development etc.) to inform funding allocation decisions for programs and state-wide data analysis.
D1	Mesa Water District	Section 6: Water Supplied and Delivered	Add a question about the system's water supply mix in terms of how much is groundwater, imported water, desal water, etc. . The reason for this is to show that agencies with different water supply mixes have different costs associated to the water those agencies serve to customers, which would provide some explanation as to differing water costs for customers of different agencies.	The State Water Board recognizes that different source types may lead to varying costs associated with producing and delivering a water supply that meets drinking water standards. However, this level of information is not currently needed for the cost evaluations conducted by the State Water Board.
D2	Mesa Water District	Section 8A: Customer Charges	Section 8.A.2.2a. (and elsewhere) – Customer Charges: change “Variable” to “Tiered” to describe rates that are charged depending on factors like water usage, meter size, elevations, etc. The reason for this is to align the term with industry vernacular...an example could possibly be provided so there is no confusion.	The State Water Board will make “in-question” and EAR Help Tips edits to add additional clarity in these terms.

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D3	Mesa Water District	Section 8B: Income	Section 8.B.1 – Income: Clarify/improve “total revenue” question specificity to ask for: Total Operating and Non-Operating Revenues attributed to the Water Enterprise from the following list of Revenue sources (skip a revenue source that does not apply): 1) Water Sales; 2) Investment Earnings; 3) Taxes and Assessments: a) Secured and Unsecured property taxes apportioned by the county from the 1% tax, b) Ad Valorem property tax levied in excess of the basic 1% rate, c) Property Taxes, d) Non Ad Valorem Taxes imposed for specific purposes (special taxes), and e) Penalties charged against owners for delinquent taxes and assessments; 4) Water Services Revenue (e.g., Standby/Capacity Charges); and, 5) Any miscellaneous operating/nonoperating revenues for which a source category is not specified BUT is attributed to the Water Enterprise.	The State Water Board will make “in-question” and EAR Help Tips edits to add additional clarity in these terms.
D4	Mesa Water District	Section 8B: Income	Can also cross reference this Government Code -- 53891 -- which requires reporting of “All Financial Transactions” (revenues as well as expenditures) by CA city and special district water systems (including Community Services Districts). FYI, 12461.1 requires the State Controller to prepare a report comparing Revenues and Expenditures; and, agencies that don’t report are subject to 12461.2	Thank you for this comment/suggestion.

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E1	Association of California Water Agencies (ACWA) &  California Municipal Utilities Association (CMUA)	Section 17: Conservation	<p>The draft 2021 Reporting Year of the Electronic Annual Report (2021 RY EAR): Water Conservation, Drought and Efficiency proposes new reporting requirements in Section B. Drought Preparedness. ACWA and CMUA appreciate the State Water Resource Control Board's (State Water Boards) interest to better understand the development and implementation of local water management plans and strongly believe that the State's drought response should recognize and complement these plans. However, we recommend that expansions to the 2021 RY EAR be consistent with the goals outlined in The Open and Transparent Water Data Act (Chapter 506, Statutes of 2016) and the Water Resilience Portfolio, which emphasize coordination among state agencies to streamline data submissions and avoid duplicative reporting. ACWA and CMUA's members went through a rigorous process to update and submit Urban Water Management Plans to the Department of Water Resources (DWR) on July 1, 2021. These updated plans had to meet new legislative requirements that help ensure more consistent local planning and response to drought. Urban Water Management Plans include a Drought Risk Assessment that assesses the water supply reliability for a period of drought lasting five consecutive years and a Water Shortage Contingency Plan that describes the method, procedures, response actions, enforcement and communication during six levels of water supply and shortage conditions. Starting July 1, 2022, public water agencies will also be required to submit Annual Water Supply and Demand Reports that will serve as the basis for the urban water supplies' annual water shortage assessment report to DWR. In addition to these reports, public water agencies are required to submit monthly conservation and production reports to the State Water Board. The monthly reports include information on stages of a water shortage contingency plan invoked, water restrictions, measures to conserve water and improve efficiency, and local enforcement action. The proposed 2021 RY EAR would require duplicative reporting on the data that is already included in these reports to DWR and the State Water Board.</p>	<p>The State Water Board agrees with the need to increase streamlining. However, there is not yet a way to accurately cross-reference information across reports. Additionally, streamlining information both intra- and inter- agency takes additional IT tools on a statewide basis with the development of an open data architecture. The State Water Board welcomes the chance to partner with interested parties in the streamlining process.</p>

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E2	Association of California Water Agencies &  California Municipal Utilities Association	Section 17: Conservation	Currently, the State Water Boards are in the process of developing water use efficiency standards as part of the water conservation legislation “Making Water Conservation a California way of Life” (AB1668/SB606). Part of AB1668/SB606 requirements includes reporting requirements that have yet to be determined for aspects such as indoor residential; outdoor residential; outdoor commercial, industrial, and institutional (CII), water loss, and CII indoor performance measures. Thus, the proposed 2021 RY EAR may also require data that partially aligns with future AB1668/SB606 reporting requirements leading to duplicative reporting efforts if requirements are the same or additional burden if the requirements are different. ACWA and CMUA encourage the State Water Board to assess all the available, existing and upcoming reporting related to drought planning and water use efficiency and develop recommendations in advance of the 2022 RY EAR to streamline and reduce redundancy. ACWA encourages the State Water Board to work with the California Data Collaborative and public water agencies in developing its recommendations for the RY 2022 EAR.	The State Water Board agrees with the need to increase streamlining. However, there is not yet a way to accurately cross-reference information across reports. Additionally, streamlining information both intra- and inter- agency takes additional IT tools on a statewide basis with the development of an open data architecture. The State Water Board welcomes the chance to partner with interested parties in the streamlining process.
E3	Association of California Water Agencies &  California Municipal Utilities Association	Section 17: Conservation	Comment # 2: Revise Table C.1.2 on Conservation Activity Expenditures The State Water Board is proposing a numeric table under Section C.1.2. of the draft 2021 RY EAR. ACWA and CMUA have two significant concerns with the table as currently proposed: (1) Data is Not Feasible: Community water systems do not collect the requested data regarding labor cost and labor time by project. (2) Data is Not Reflective: The proposed data would not accurately reflect conservation strategies, regional trends and cost. ACWA and CMUA believe that more valuable and useful information could be reported than what is currently proposed. Additionally, we have concerns that the feasibility issues and table as formatted could result in flawed data that could misconstrue public water agencies’ water use efficiency efforts, investments and overall cost-effectiveness of water use efficiency strategies. ACWA and CMUA would like to work with State Water Board staff over the next several weeks to revise the table.	Since proposing the inclusion of a table to gather data related to conservation program activities and expenditures conducted by water systems, the State Water Board has met with stakeholders to refine the information to be gathered. It was decided to not include questions related to conservation activities and expenditures in the 2021 eAR. However, it is the goal to have a better understanding of conservation potential, as well as how conservation investments affect water use trends. The State Water Board will continue to work with stakeholders to develop appropriate questions to gather information related to such activities.

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E4	<p>Association of California Water Agencies &amp;</p> <p>California Municipal Utilities Association</p>	Section 8C: Water Affordability	<p>Comment #3: Reporting Requirements Should Be Necessary and Appropriate. The draft 2021 RY EAR proposes to include expanded reporting requirements from the 2020 RY EAR, including: 8(A) Customer Charges, 8(B) Income: Revenue and Expenses, and 8(C) Affordability. Completion of the EAR uses public resources at systems that provide essential services. Any expanded reporting in the 2021 RY EAR should be necessary for implementation of the State Water Board’s regulatory (compliance) programs, so as not to unnecessarily divert local resources. As explained below, the questions in Section 8 are not necessary for the State Water Board to implement its regulatory programs and should be removed from the EAR. (1) SB 200 (Monning, 2019): Drinking Water: State Water Board staff included new questions for the implementation of SB 200 in the 2020 RY EAR. ACWA and CMUA believes it is not necessary to include those questions in the 2021 eAR reporting for SB 200 purposes. SB 200 establishes a funding program – not a new regulatory compliance program. ACWA is actively engaged in the State Water Board’s SB 200 implementation efforts and supports solution-oriented and efficient use of the funding to solve drinking water issues. A. Scope of SB 200: Whereas the EAR affects the large universe of public water systems, SB 200, as it pertains to public water systems, is more narrowly focused on a much smaller subset of systems that consistently fail to provide an adequate supply of safe drinking water or are at a significant risk of failing to provide an adequate supply of safe drinking water. Not all the systems in this subset will receive funding, as some are financially sustainable, for example. For those specific systems that are being considered for SB 200 funding, or to be part of an SB 200 system solution, it seems appropriate that the State Water Board request information in the SB 200 funding decision process. It is not necessary or appropriate to require the much broader universe of public water systems to compile and submit detailed data in the generic name of SB 200 implementation. Questions regarding the larger universe of public water systems relating to rates, revenue, and expenses are not necessary for SB 200 implementation or other programs and should be deleted from the proposed EAR.</p>	<p>The State Water Board utilizes the financial data from Section 8 of the EAR in the annual Drinking Water Needs Assessment. This information is also utilized by the State Water Board for conducting benefit cost analysis for regulatory development; supporting new Programs like the Water and Wastewater Arrearage Payment Program; and new legislative proposals. This information is also utilized by other State agencies (Department of Water Resources, California Public Utilities Commissions, Department of Community Services and Development etc.) to inform funding allocation decisions for programs and state-wide data analysis.</p>

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E5	Association of California Water Agencies &  California Municipal Utilities Association	General	Comment #4: Pre-printed System and Contact Information Should be Updated Public Water Systems expend significant staff time and resources updating the EAR with the required system and contact information, but these changes are not reflected in the following year's EAR. ACWA recommends that the State Water Board ensure that the EAR is pre-printed with the up-to-date information as reported by system staff in the prior year.	The State Water Board has recognized the complex nature of obtaining updates to contact information via the EAR. The design of the 2021 EAR Contact Section is being improved to ensure that contact changes are reported in a manner to ensure the ability to extract the information for reporting to SDWIS, the State Water Board's database of record. The prefill into the EAR Contact Section is taken from SDWIS each year. Making changes to contact information reported in the EAR to SDWIS is a manual process meaning each water system EAR is treated one at a time for manual entry into SDWIS. To address all of these issues, as well as recognize that contacts change during the year and this information should be reported in a timely manner, the State Water Board has envisioned a whole new system for water system contact maintenance. This IT project should begin development over the next two years.

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F1	Los Angeles Department of Water & Power	Section 17: Conservation	<p>Currently, the State Water Board is in the process of developing water use efficiency standards as part of the water conservation legislation “Making Water Conservation a California way of Life” (AB1668/SB606). Part of AB1668/SB606 requirements includes reporting requirements that have yet to be determined for aspects such as indoor residential; outdoor residential; outdoor commercial, industrial, and institutional (CII), water loss, and CII indoor performance measures. Thus, the proposed 2021 RY EAR may require data that partially aligns with future AB1668/SB606 reporting requirements leading to duplicative efforts if requirements are the same or additional burden if the requirements are different.</p> <p>LADWP encourages the State Water Board to assess all the available, existing and upcoming reporting related to drought planning and water use efficiency and develop recommendations in advance of the 2022 RY EAR to control and reduce redundancy. LADWP encourages the State Water Board to work with the California Data Collaborative and public water agencies in developing its recommendations for the RY 2022 EAR.</p>	<p>The State Water Board agrees with the need to increase streamlining. However, there is not yet a way to accurately cross-reference information across reports. Additionally, streamlining information both intra- and inter- agency takes additional IT tools on a statewide basis with the development of an open data architecture. The State Water Board welcomes the chance to partner with interested parties in the streamlining process.</p>
F2	Los Angeles Department of Water & Power	Blank Report in Word Format	<p>It is generally considered that “HTML is accessible”. What is usually meant is that HTML is <b>inherently</b> accessible, but in a strictly limited sense. The HTML format creates inconsistencies in certain categories of elements when it is saved in Word. These include character formatting, paragraph formatting, page layout, graphic formatting, to mention a few. These inconsistencies affect how individual sections within the electronic annual report can be isolated and shared with various work groups. LADWP recommends that the State Board add an option to export the document in Word format in order to allow various end users the ability to work collectively in a team format while preparing their annual reports without compromising the contents of the report.</p>	<p>The State Water Board is unable to meet this request at this time. This capability will be evaluated for implementation in future years.</p>

No.	Organization	EAR Section Number	Question/Comment/Suggestion	State Water Board Response
F3	Los Angeles Department of Water & Power	Excel File Upload	<p>The electronic annual report contains data and information reported in certain customized formats. One of the major formats used for reporting is excel spreadsheets. During the 2020 EAR, LADWP reported a significant amount of data using spreadsheets. These spreadsheets are meant to be uploaded directly onto the portal. The other option would be to make manual entries which would be burdensome and time-consuming.</p> <p>Our recent experiences have shown that when these spreadsheets are uploaded directly onto the portal, the integrity of the data is usually compromised. Some of the data are distorted due to the incompatibility features within the reporting portal.</p> <p>LADWP is recommending that this compatibility or incompatibility feature be fixed. We also recommend that an alternative be provided to end users such as the State Waterboard FTP site. This will enable preparers of this annual report to send these large documents to the State as attachments onto the FTP site.</p>	<p>The EAR includes document uploads in many formats including Excel for Residential Rates, LSL Schedule, and the Bulk Data Upload to specific Survey Questions. The State Water Board will continue to evaluate any issues related to this functionality to ensure data is not corrupted during the upload process. Please report any issues with data uploads via <a href="mailto:DRINC@waterboards.ca.gov">DRINC@waterboards.ca.gov</a>.</p>
G1	California Water Association	General	<p>We'd recommend that the report be due in Q3 each year, specifically we suggest August 1. This timing will ensure that the eAR is already filed and, for the CPUC regulated utilities, our CPUC Annual Report will also be filed. Also, submitting later in the year will ensure that the CPUC regulated utilities do not have SEC reporting issues.</p>	<p>The State Water Board recognizes the burden of reporting similar information to multiple agencies. At this time a change to the schedule for obtaining the EAR information from public water systems cannot be considered due to the need for the majority of information early in the year for multiple uses with mid-year deadlines. However, at the time the State Water Board is able to split the EAR into different survey modules, there can be consideration to a change to the timing of the due dates.</p>



No.	Organization	EAR Section Number	Question/Comment/Suggestion	State Water Board Response
G2	California Water Association	General	<p>We think the report should cover a three year period and should be reported to the State Water Board every five years. A three year snapshot will give the State Water Board a more robust understanding of water rates, which can fluctuate year to year. For example:</p> <p>August 1, 2021 – Submit Financial eAR for 2020, 2019, 2018</p> <p>August 1, 2026 – Submit Financial eAR for 2025, 2024, 2023</p>	<p>The State Water Board is unable to change the frequency of the EAR at this time due to the need for much of the information on an annual basis. However, at the time the State Water Board is able to split the EAR into different survey modules, there can be consideration both to frequency and timing of the survey due dates.</p>