



Comments to *Low-Income Water Rate Assistance Draft Report*
Submitted by: The Center for Water Security and Cooperation
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1. Meaningfulness of the discount: will the discount allow for the household to pay their bill and not have their water and sewer services shut off?

A critical question for ultimately determining the success of this LIRA program is whether the assistance provided through the LIRA program increases the affordability of water for vulnerable and low-income households. In other words, do the discounts provided by the LIRA programs allow for the households to consistently pay their water bills in full? If the discounts do not allow households to pay their water bills on time, in full and consistently, then the LIRA program has failed. However, no evidence has been included to demonstrate that the discounts being provided will improve the likelihood that low-income families will be able to pay their water bills in comparison to the likelihood if no LIRA program was offered. This Report should be able to demonstrate how the assistance expected to be provided by the proposed LIRA program will actually be able to help families pay their water bills. Without such exploration, it is unclear whether the 20%, 35% or 50% discount levels will actually increase the affordability of water.

Based on the Report, the SWRCB states that “46% of California’s population is served by a community water system (CWS) offering some form of a rate assistance program, and many of these programs have low levels of enrollment and limited financial support.” State Water Resources Control Board, *Options for Implementation of a Statewide Low-Income Water Rate Assistance Program*, 3 January 2019, page 4. While no source is provided for this information, having this information provides a potential source of data from which to gauge the success of existing LIRA programs and to determine whether certain discount amounts increase the likelihood of households to pay their water bills and whether the payments were in full and consistently paid.

2. Evaluating the success or failure of the program: how will the success of the LIRA program be measured and reported?

As the proposal stands, there are no indicators for determining how to measure success of the proposed LIRA program, no requirements to monitor and report on the success, and no required review process by which to evaluate and improve the program periodically to ensure that the purpose of the program - to provide meaningful financial assistance to households to ensure that they can consistently pay their water bills in full and on time - is actually being achieved. Without a monitoring and review mechanism in place, this program may or may not achieve its

intended purposes. There will be no way to determine whether low-income households are *actually* able to pay their water bills and avoid water shutoffs without this.

Two critical indicators of success are: 1. whether low-income households receiving the financial assistance are able to pay their water bills in full, and 2. whether those households pay their water bills consistently and without missing one or multiple payments. As stated previously, if the households intended to be helped by this program are unable to pay their water bill, then the financial assistance is not making the water bills any more affordable than before the assistance was provided. Furthermore, monitoring households' ability to pay will help to determine whether any changes to the program need to be made. For example, if households with incomes at 200% of the federal poverty level (FPL) are able to consistently pay their bills with the provided assistance, while families at 150% or 100% are not, that indicates there is a need to increase the discount in order to make the program successful at those levels. However, this cannot be determined without monitoring, reporting and review mechanisms in place.

3. 12 CCF: will the incorporation of outdoor use to the level of consumption detract from funding that could be used to make sure that more families will have sufficient access to water for domestic purposes?

Without additional explanation as to the purpose and benefit of including water for outdoor use, it seems unusual to include this in the consumptive level threshold. There are two significant questions raised by including outdoor use in the threshold level: 1. How likely is it that households in need of financial assistance use water for outdoor purposes (e.g. do households in multifamily dwellings, where many households reside, have the opportunity or need to use water outdoors) and 2. is "outdoor water use" a water use that the LIRA program should be seeking to protect when the indoor uses of other families in need may not be met? The Report should describe why a daily volume of water for outdoor use is included in the measure of consumptive use.

4. Correction to Appendices: more recent legislation addressing LIRA has been introduced than stated in the Appendices.

On page 21 of the Appendices, the Report indicates that the most recent legislation introduced to the U.S. Congress was introduced in 2016. However, the most recent legislation that has been introduced regarding LIRA is the bipartisan bill entitled Low-Income Water Customer Assistance Programs Act of 2018 (S. 3564) that was introduced by Senators Cardin and Wicker on 31 October 2018. This bill, if passed, would provide monies for piloting LIRA programs in multiple states as well as mandate a detailed investigation by the EPA on existing LIRA needs around the country.