Memo: Water Loss Control Performance Standards  
December 2021

The State Water Resources Control Board's (State Water Board) proposed regulation would establish water loss control performance standards (standards) for urban retail water suppliers (URWS or supplier). The proposed standards in the Excel file “WL-Performance-Standards_2021-December” are preliminary for the following reasons:

- Suppliers have been submitting water loss audit data since 2017, but only water loss control audit data submitted prior to July 2021 was used to calculate these proposed standards. A static data set was needed to calculate the costs and benefits of this regulation for the Standardized Regulatory Impact Assessment (SRIA), which was submitted to the Department of Finance on October 13, 2021.
- Within the model used to develop the standards, there are 11 customizable parameters, including the Infrastructure Condition Factor (ICF) and average leak detection survey frequency. Suppliers can and have been requesting to customize these parameters since May 2021. Because so few suppliers have requested customization to date, default values were used to calculate the proposed standards.
- The proposed regulation allows URWS to request one outlier year of water loss data to be removed from the average used to calculate their standard. No outlier years were removed to calculate these proposed standards. State Water Board will accept requests to remove outlier years on an on-going basis.

The proposed standards in Table 1 will be re-calculated after the 45-day comment period for this regulation. If suppliers submit requests to customize parameters by February 11, 2022, those updates will be used to calculate revised proposed standards that staff bring to the Board for consideration for adoption.

- Any changes to audit data or requests to customize parameters must be submitted by February 11, 2022, to be included in the revised proposed standards.
- The proposed regulation allows suppliers to continue to request to customize certain parameters through July 1, 2023. After that, Board approval would be required for parameter updates (determinations would be made on a case-by-case basis).

The data used to calculate the proposed standards in Table 1 are provided in Table 2. Table 2 displays the years of audit data included in the averages, the averaged parameter values used, and the baseline apparent loss.

- This data set will be updated after February 11, 2022.
- This data set only represents data submitted through July 2021.
- Because 2020 water loss audits are due January 1, 2022, many 2020 audits are not included in these proposed standards.
If no audits were available for a supplier for the 2017 through 2020 period, 2016 audit data was used, when available, as a placeholder.

Table 3 shows all of the URWS that have not submitted water loss audits for any year, as of July 2021. The State Water Board is expecting water audit data from these systems to calculate standards. If you believe any systems are in this table or any other table in error, please contact ORPP-WaterLossControl@Waterboards.ca.gov.