

## Committee on Water



# Water Efficiency and Conservation

NARUC February 2019

- Maureen Westbrook  
Vice President, Customer and Regulatory Affairs



# Water Conservation in Connecticut

- 
- \* **Water 'Rich' State**
  - \* **Adequate Water Supply to Meet Current and Future Demands**
  - \* **Strong Environmental Focus**
  - \* **Laws and Policies Protect Water Resources**
  - \* **State Water Plan - Balance Public Health, Safety, Economic Development and Environmental Goals**

# Water Rates & Design



Reflect the “value of water”



Revenue requirement for operating and capital costs



Balance customer rates and company's financial needs to sustain system



Meet current and future system needs



# Water Revenue Adjustment Mechanism

- \* Authorized by law in Connecticut in 2013
- \* Intended to support water conservation
- \* Annual rate adjustments to recover PURA approved revenues from last rate case
  - \* Adjustment could be a surcharge or credit depending on amount of revenues collected in a calendar year
  - \* Details submitted to PURA annually for approval before adjustment applied to customers' bills
- \* Customers protected – sharing of overearnings



# Overearnings Protections

- \* Protection for customers if company overearns their allowed ROE
  - \* Rolling review, sharing required if exceed allowed ROE
  - \* Reviewed - WICA and WRA filing
- \* Provides safeguards and assurances as regulators consider such ratemaking tools



# Traditional Conservation Efforts



Bill inserts, bill messages

Website, social media

Direct mailings to targeted systems

Water conservation calendar

Water conservation calculator

Notice of high bills

# Recent Conservation Initiatives



## Municipal Retrofit

- Offered in all service towns
- Fixtures inspected and replaced



## *Water Drop Challenge* – Customer Incentive to Conserve

- 5,000 customers enrolled
- 40% achieved the savings goal
- 30 million gallons saved



## *Water Drop Watchers* – Conservation Education

- 23 schools, 109 classes
- Over 2,500 students





Good regulatory tools make a difference



Simple and easy to understand



Remove financial barriers



Deliver results for shared goals

## Committee on Water



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# California's New Water Use Efficiency and Drought Planning Legislation: Implications for Regulators

Jack Hawks  
NARUC Winter Policy Summit  
Washington, DC  
February 11, 2019





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# Drought/Conservation Milestones





# 2018 Legislation

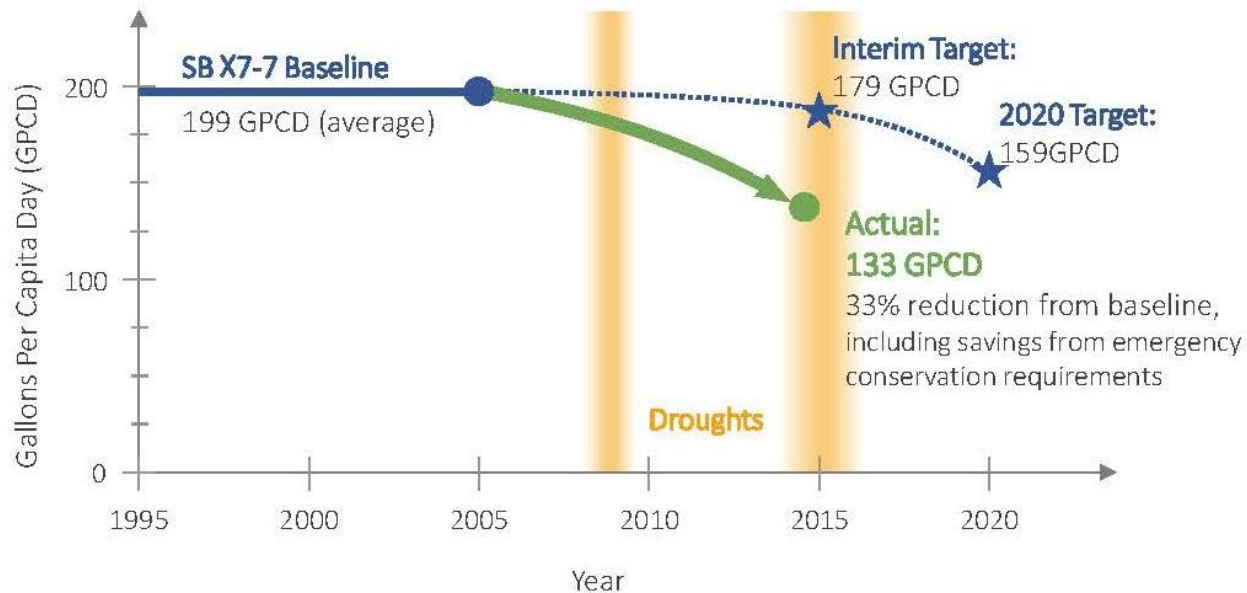
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Use Water More Wisely	<ul style="list-style-type: none"><li>• Water budget-based method for quantifying urban water use objectives</li><li>• Urban retail water use efficiency standards adoption and water use objectives</li><li>• Urban retail water use objective implementation, reporting, and enforcement</li><li>• Expanded civil liability for violations by urban water suppliers</li></ul>
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# Conservation Progress

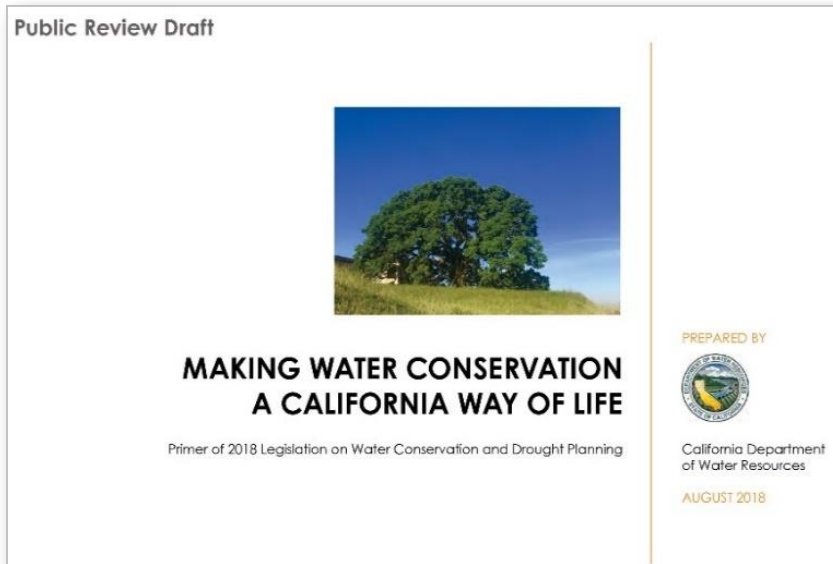


Urban water suppliers reported an average per capita water use of 133 GPCD in 2015, a 33 percent reduction from the baseline conditions set for SB X7-7 and well below the interim target of 179 GPCD and the final target of 159 GPCD.

**Figure 3-1. Conservation Targets under SB X7-7 Compared with Actual Conservation**



# Primer as Reference



- **Purpose:** Summarize authorities, requirements, and schedules in new legislation; roles and responsibilities of state agencies, water suppliers, and other parties.
- Requirements summarized and organized by primary goal
- Appendix A: Summarize Actions **Mandated** by Legislation
- Appendix B: Major State Agency Tasks for Implementation
- Appendix C: Major Water Supplier Tasks for Implementation

Developed by Dept. of Water Resources, State Water Resources Control Board





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# Urban Water Use Efficiency

Each water utility will be subject to an annual target (2023)

- Water use target based on efficiency or performance standards, not a percentage reduction from a baseline
- Efficiency standards used to calculate a water use objective, or budget
- New water use objective is the sum of aggregate estimated efficient use:
  - **Indoor water use standard (2018)**
  - **Outdoor residential irrigation standard (2022)**
  - **CII Landscape Irrigation with dedicated meters (2022)**
  - **Water Loss Standard (2020)**
  - **Variances**



- Dept. of Water Resources Completes Indoor Water Use Study and Report, with Recommendations to Legislature by 1/1/2021
- Indoor Standard Set in Statute
  - 55 gpcd until 1/1/2025
  - 52.5 gpcd until 1/1/2030
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# Outdoor Standards

- Development of outdoor water use standards for
  - Residential outdoor use
  - Landscape water use associated with CII dedicated-meters
- DWR acquiring data on all state residential *irrigated* land through aerial imagery, weather stations (2021)
- Based on principles of *Model Water Efficient Landscape Ordinance*
  - Regulation for local land use authorities
  - Sets minimum standards for the design and installation of resource efficient landscapes applying primarily to
    - New developments
    - Retrofit landscapes requiring a permit
    - Water allowance approach







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# Water Loss Standard

- Per 2015 law, Water Board must set water loss performance standards by July 1, 2020
- Formal rulemaking to begin in July 2019
  - Based on AWWA M 36 Manual
  - CEQA
  - Economic Analysis



# Variances: Unique Water Uses

Variances and thresholds of significance will be developed for each of the following unique water uses:

**Evaporative  
coolers**

**Horses and other  
livestock**

**Seasonal  
populations**

**Landscaped areas  
irrigated with  
recycled water**

**Soil compaction  
and dust control**

**Ponds and lakes to  
sustain wildlife**

**Irrigation of  
vegetation for fire  
protection**

**Agricultural use**

**Others TBD**



# The Utility Budget

## Calculating Urban Water Use Objective

### Urban Retail Water Supplier's Urban Water Use Objective (CWC §10609.20(c))

Aggregate estimated efficient indoor residential water use



Aggregate estimated efficient outdoor residential water use



Aggregate estimated efficient outdoor irrigation of landscape areas with dedicated irrigation meters or equivalent technology in connection with CII water use



Aggregate estimated efficient water losses



Aggregate estimated water use for variances approved by the State Water Board



### Allowable Bonus Incentive Adjustments (CWC §10609.20(d))

Volume of potable reuse water from existing facility, with completed environmental review by January 1, 2019, that becomes operational by January 1, 2022, not to exceed

**15% of urban water use objective**



Volume of potable reuse water from new facility, not to exceed

**10% of urban water use objective**



Urban Retail Water Supplier's "adjusted" urban water use objective for annual reporting purposes and comparison to the actual water use in the previous year



- Prepare for a drought of 5 years or longer
- Annual supply and demand assessments beginning in 2022
- Support for most vulnerable small systems
  - Identify small suppliers and rural communities at risk of drought and water shortages
  - Propose recommendations to address drought contingency planning for small water suppliers and rural communities in Report to Governor.
  - Countywide planning approach





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# Compliance and Enforcement

## Progressive approach

- Information Orders
- Conservation Orders
- Administrative Civil Liability







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# Questions



**Jack Hawks**  
**[jhawks@calwaterassn.com](mailto:jhawks@calwaterassn.com)**



## Committee on Water



# WATER EFFICIENCY POLICIES AND REVENUE IMPACTS

Mary Ann Dickinson  
NARUC Winter Policy Summit  
February 12, 2019



[Home](#) » [Opinion](#) » This Article

## Opinion: No One Can Live on The 55-Gallons-a-Day Water Limit California Is Imposing

POSTED BY EDITOR ON JULY 22, 2018 IN OPINION | 1536 VIEWS | 3 COMMENTS | [LEAVE A COMMENT](#)

### LATEST NEWS

**It's Now Against The Law In California To Shower And Do Laundry On The Same Day**

# Look out, California. More punitive water restrictions are on their way

ENERGY / COMMENTARY

## Blame California's Crazy Left-Wing Politics for Water Rationing

[Jarrett Stegman](#) / [@JarrettStegman](#) / June 06, 2018 / 158 Comments

As some have noted, the restriction could make it difficult for some California citizens to [do laundry and take a shower on the same day](#) without going over the limit.

# CA CONSERVATION WATER TARGETS

To create each water provider's unique target,  
the following standards will be calculated and added together:

## INDOOR USE



The standard for indoor residential water use is 55 gallons per person per day multiplied by the population of the service area.



## OUTDOOR USE



The standard for outdoor residential water use is based upon a community's climate and the amount of landscape area and is still to be determined.



## WATER LOSS



The standard for water loss due to leaks in the water system pipes is still to be determined.



## CII LANDSCAPE



The standard for outdoor CII water use for accounts with dedicated irrigation meters is still to be determined.



# Efficiency Standards

# TIMING

**2018**



Begin  
standard  
development

**2022**



Adopt  
standards,  
PMs, and  
method

**2023**



Suppliers  
calculate  
objectives

**2026**



All suppliers  
reach  
objectives

Source: State Water Resources Control Board

## *Texans Answer Call to Save Water, Only to Face Higher Rates*

By NEENA SATIJA FEB. 8, 2014

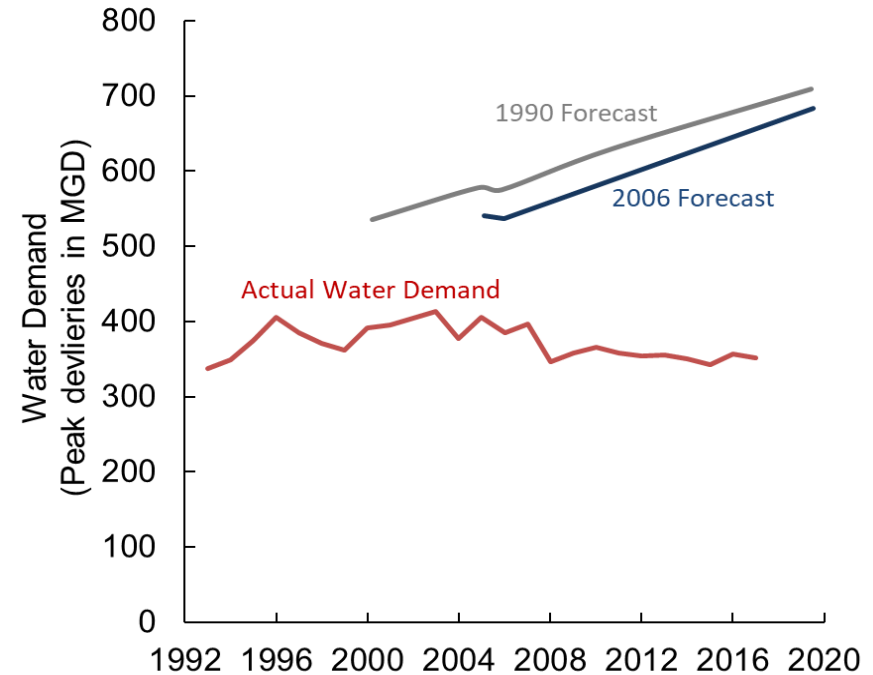
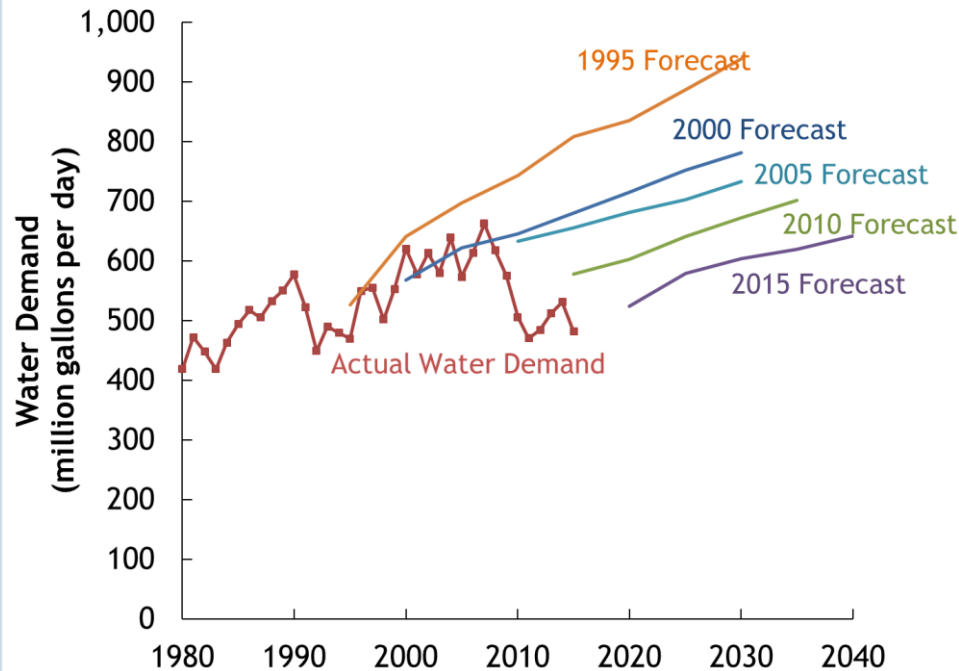


“The losses have prompted credit ratings agencies to look closer at the finances of public utilities in Texas. One agency, Fitch, downgraded some of Fort Worth’s water and sewer debt last year, and last week the firm downgraded the debt of the city’s wholesale water supplier. **Fort Worth lost \$11 million last year because of water conservation.**”

# What Really Affects Revenue Stability?

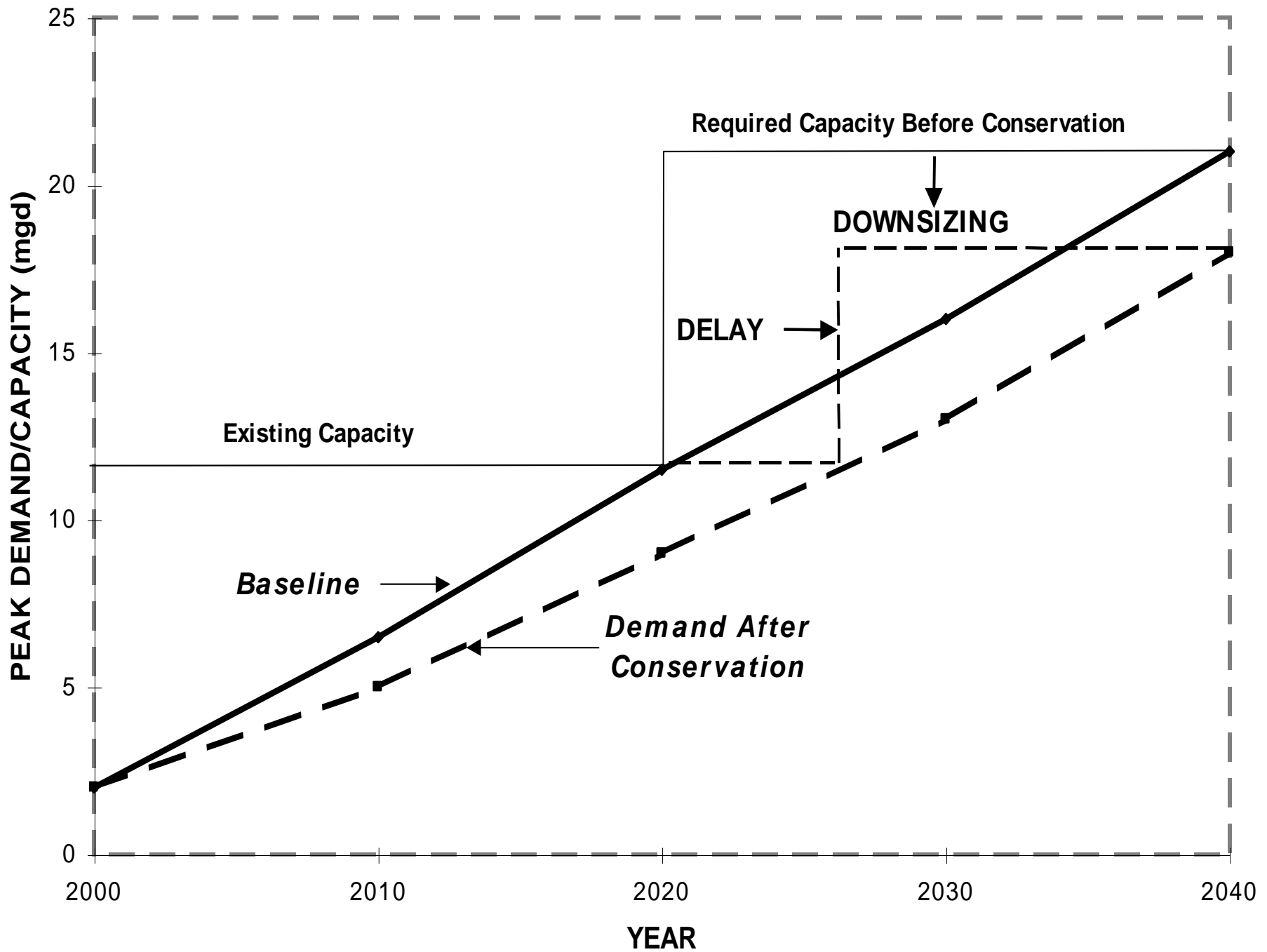
- ▶ Reduced demand from:
  - efficient fixture replacement under the plumbing and appliance codes
  - active conservation programs
  - the recession: industrial shift layoffs, home foreclosures
- ▶ Reduced peak demand in wet years
- ▶ Increased infrastructure costs
- ▶ Rise in other fixed costs
- ▶ Continuing Inflation
- ▶ Poor Demand Forecasting

# Forecasts often overestimate demand



Recommendation: Examine the accuracy of your demand forecasts and monitor trends in water use.

Heberger, Donnelly, and Cooley, 2016. "A Community Guide for Evaluating Future Urban Water Demand." Pacific Institute, Oakland, CA.



# AWE CONSERVATION TRACKING TOOL: UTILITY REVENUES & RATES WORKSHEET

**Review revenue requirement and rate impacts:** This worksheet calculates the impact of planned conservation on annual revenue requirement, average rates, and average bills. It assumes the volumetric revenues generated by the baseline demand and rates forecasts correspond to the utility's volumetric revenue requirement. It then adjusts forecasted annual water sales and revenue requirement using the water savings, conservation program cost, and utility avoided cost estimates calculated earlier. The adjusted revenue requirement equals the baseline revenue requirement plus annual conservation program cost minus annual avoided water supply cost. The adjusted average volumetric rate equals adjusted revenue requirement divided by adjusted annual water sales. The adjusted average monthly volumetric bill equals adjusted revenue requirement divided by number of accounts divided by 12. Calculations are done for two alternative financing strategies for planned conservation. The first strategy treats planned conservation as an operating expense. The model assumes planned conservation is paid for in the year it occurs (Pay-Go financed). The second strategy treats planned conservation as a capital expense. The model assumes planned conservation is debt financed. You can set the debt financing term using the drop-down list.

## Select Chart to View

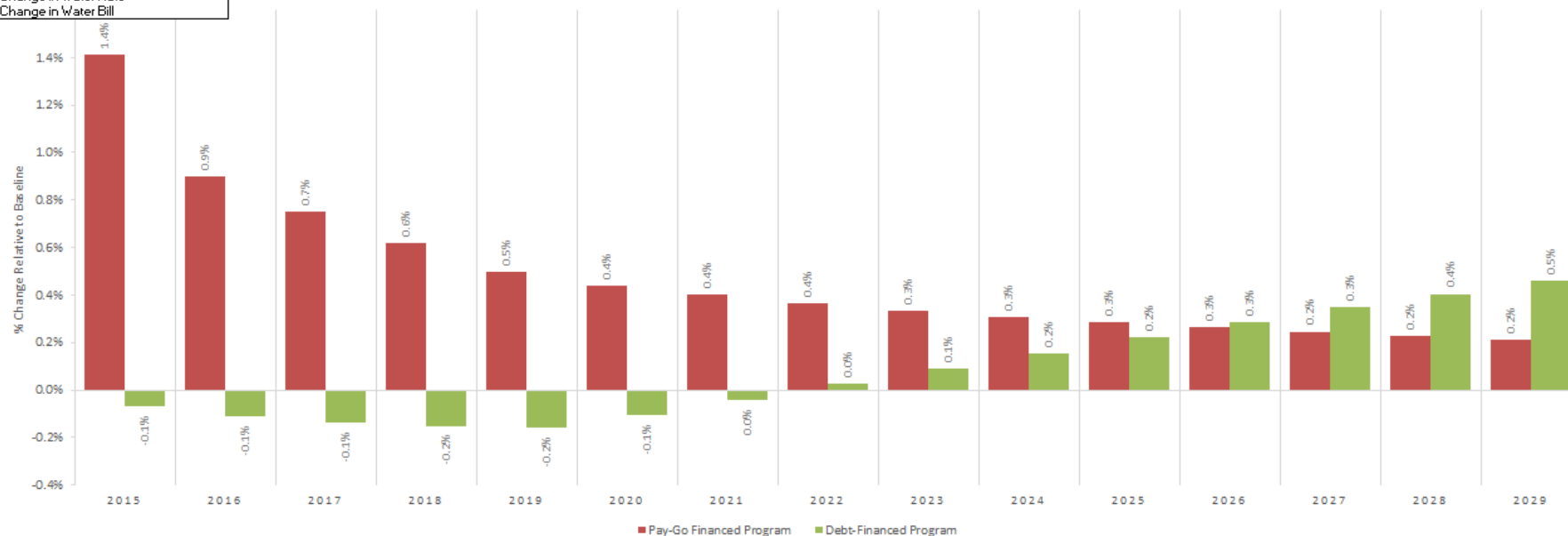
- Change in Rev. Req.
- Revenue Requirement
- Avg. Water Rate
- Avg. Water Bill
- Change in Rev. Req.
- Change in Water Rate
- Change in Water Bill

Debt Financing Term (Yrs): 15

Years to Display in Chart: 15

Chart Explanation

Change in Annual Volumetric Revenue Requirement Due To Utility Conservation Program



## Baseline Volumetric Revenue Requirement, Average Rate, & Average Bill

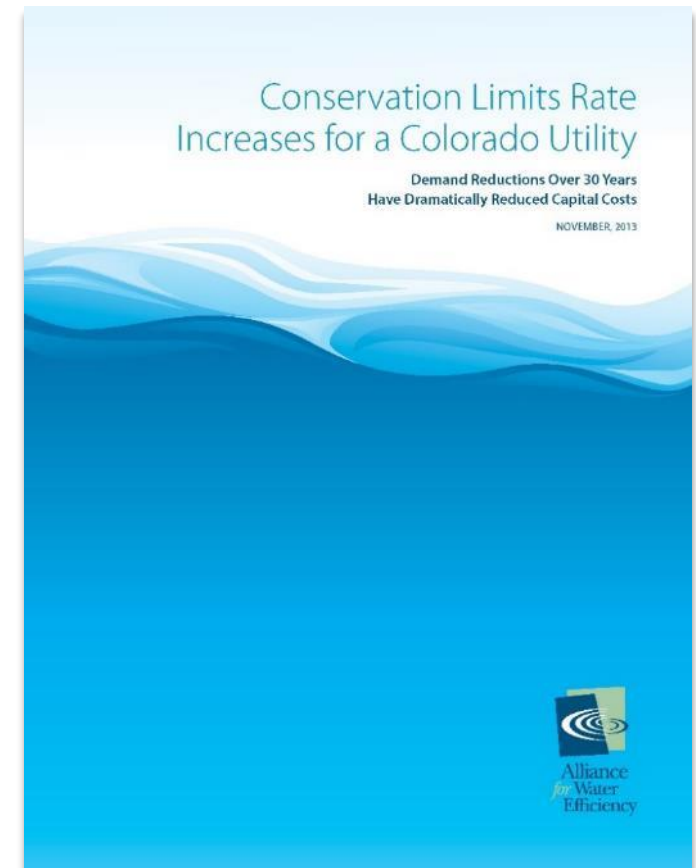
### Baseline Water Sales Forecast (from 2. Specify Demands)

Customer Class	Units	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027
Single Family	AF	43,779	43,800	43,827	43,851	43,880	43,913	44,069	44,229	44,393	44,560	44,731	45,024	45,321
Multi Family	AF	3,324	3,309	3,295	3,281	3,268	3,257	3,254	3,252	3,250	3,250	3,250	3,259	3,266
CII	AF	13,458	13,481	13,504	13,528	13,553	13,578	13,641	13,705	13,769	13,833	13,898	14,000	14,100
Irrigation	AF	6,729	6,748	6,767	6,787	6,806	6,825	6,864	6,902	6,940	6,979	7,017	7,075	7,131
Not in use	AF	0	0	0	0	0	0	0	0	0	0	0	0	0
Not in use	AF	0	0	0	0	0	0	0	0	0	0	0	0	0
Not in use	AF	0	0	0	0	0	0	0	0	0	0	0	0	0
Not in use	AF	0	0	0	0	0	0	0	0	0	0	0	0	0
Not in use	AF	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>AF</b>	<b>67,289</b>	<b>67,338</b>	<b>67,394</b>	<b>67,447</b>	<b>67,507</b>	<b>67,572</b>	<b>67,827</b>	<b>68,087</b>	<b>68,352</b>	<b>68,622</b>	<b>68,896</b>	<b>69,359</b>	<b>69,821</b>



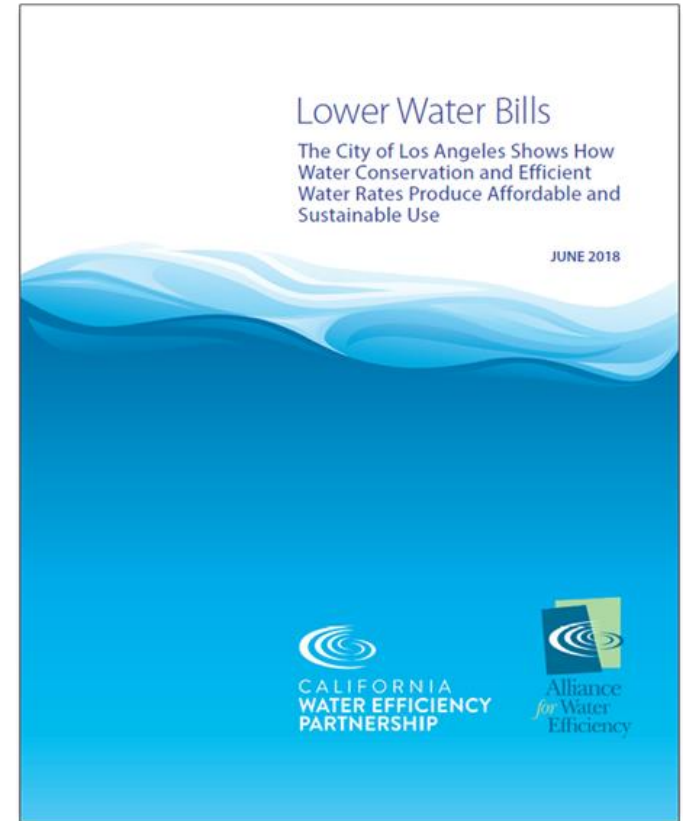
# Westminster's Story

- ▶ Citizens complained about being asked to conserve when rates would just go up anyway
- ▶ Westminster reviewed marginal costs for future infrastructure if conservation had not been done
- ▶ Since 1980 conservation has saved residents and businesses **80% in tap fees** and **91% in rates** compared to what they would have been without conservation



# LA's Story

- ▶ Similar story with unpopular rate increases
- ▶ Study of costs avoided with water conservation programs
- ▶ Analysis completed in August, 2018
- ▶ LA had \$11 billion in avoided infrastructure costs, which reduced customer bills by 26.7%
- ▶ Two other studies done in Arizona with similar results



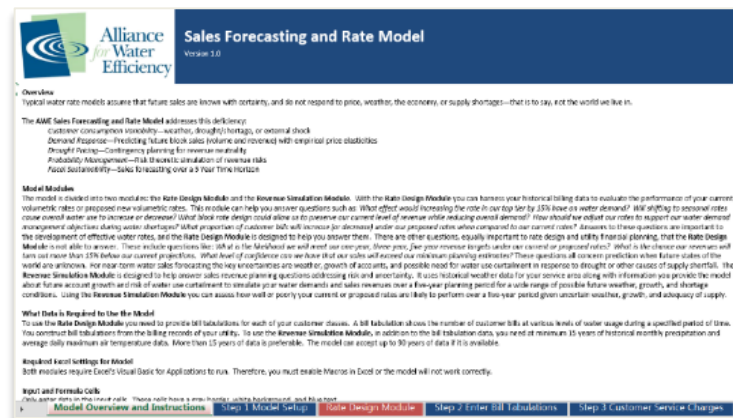
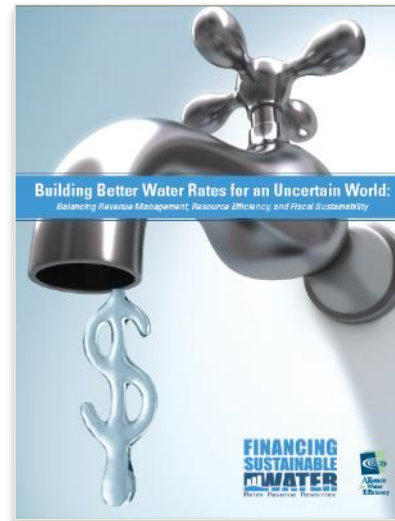


# Financing Sustainable Water



# What is Financing Sustainable Water?

- ▶ **Building Better Rates in an Uncertain World:** A Handbook to explain key concepts, provide case studies and implementation advice
- ▶ **AWE Sales Forecasting and Rate Model:** Innovative, user-friendly tool to model scenarios, solve for flaws, and incorporate uncertainty into rate making
- ▶ **FinancingSustainableWater.org:** Web-based resources to convene the latest research and information in one location, including consumer videos





## Financial Instruments to Manage Revenue Risk

A new white paper explores opportunities for utilities to use financial instruments - such as derivatives, insurance and bonds - to manage weather-related revenue risk in an increasingly volatile climate.



## Rates. Revenue. Resources.

Financing Sustainable Water is an initiative of the Alliance for Water Efficiency. It was created to provide practical information to guide utilities from development through implementation of rate structures that balance revenue management, resource efficiency and fiscal sustainability. This website will be updated frequently with new content and we encourage visitors to return often for additional information and resources. The Alliance serves as a North American advocate for water efficient products and programs, and provides information and assistance on water conservation efforts. [Learn More](#)



### WATER MANAGERS

Find guidance on sustainable financial management



### ELECTED OFFICIALS

Support your utility through smart management practices



### CONCERNED CITIZENS

Learn how you can help create a sustainable water future



### MEDIA

Get facts on today's water challenges and solutions



**RATES  
HANDBOOK**  
Building Better  
Rates for an  
Uncertain World



**RATE  
MODEL**  
Sales  
Forecasting  
and Rate Model

### RECENT NEWS

- [Welcome to Financing...](#)

### FEATURED RESOURCES

- [Case Study: Cobb County](#)  
Public Engagement Success
- [Report: Westminster, CO](#)  
Conservation Lowers Rates

## Committee on Water





# NARUC Winter Policy Summit

## Water-Efficiency & Conservation

### A Utility Perspective

Rob Kuta

Vice President, Engineering

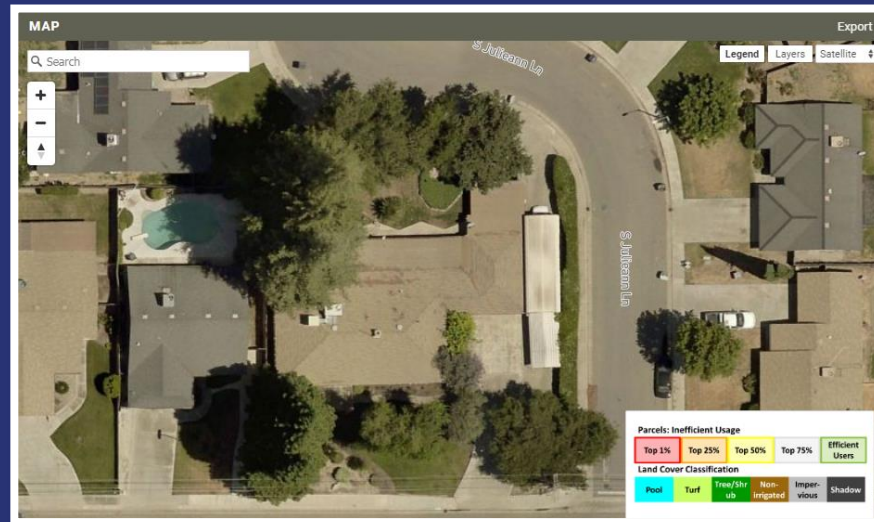
Chief Water Quality & Environmental Compliance Officer

# Water-Efficiency Leadership

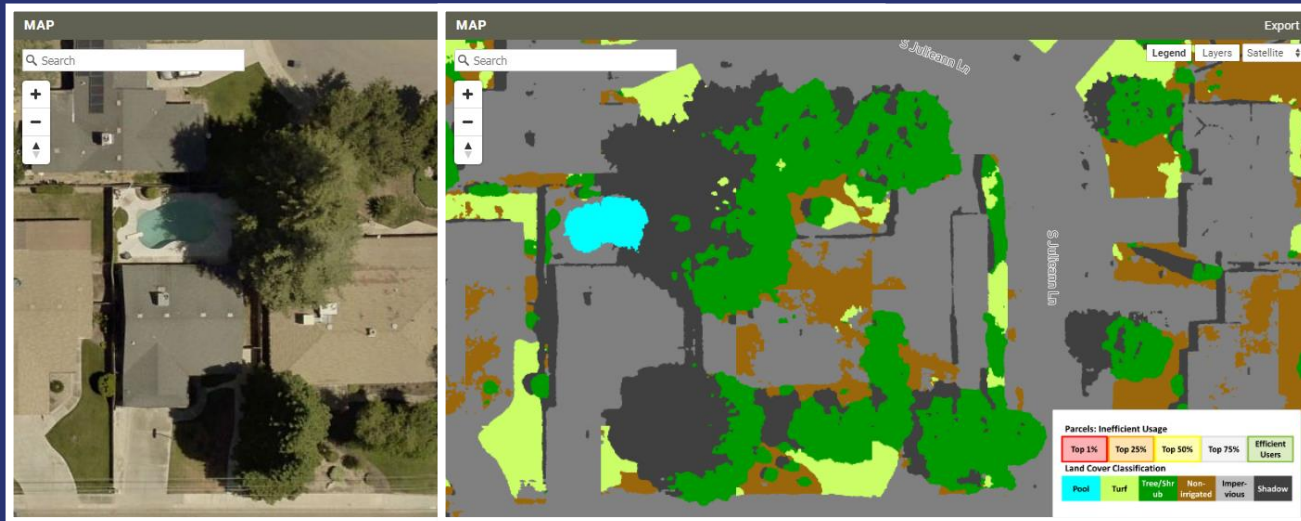


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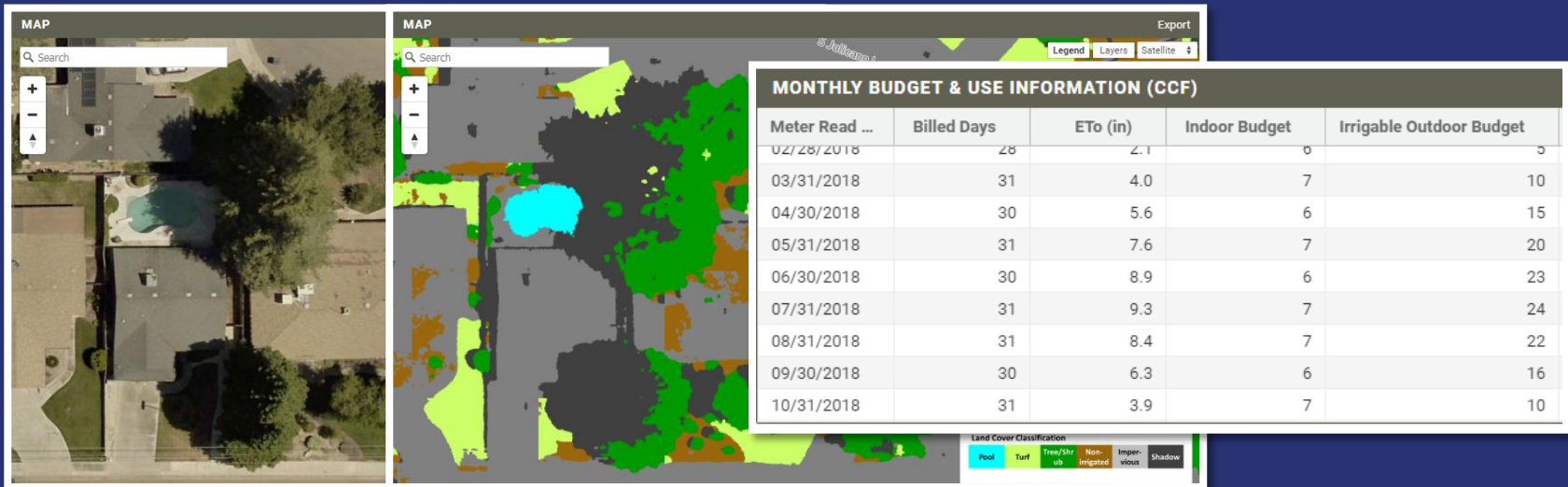
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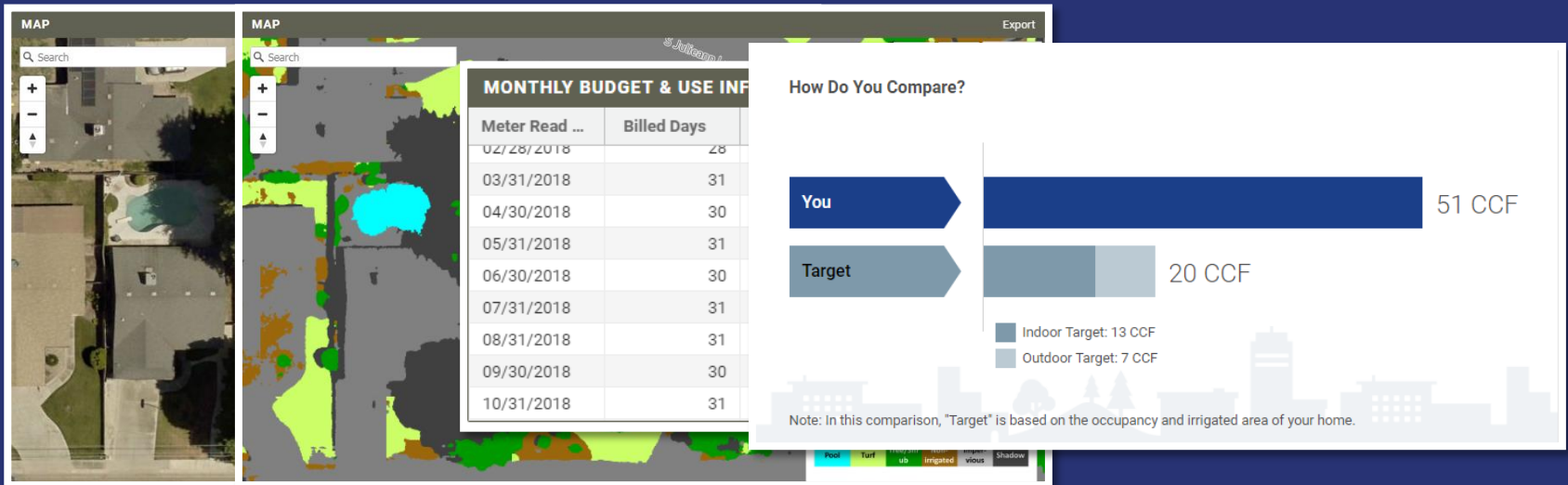
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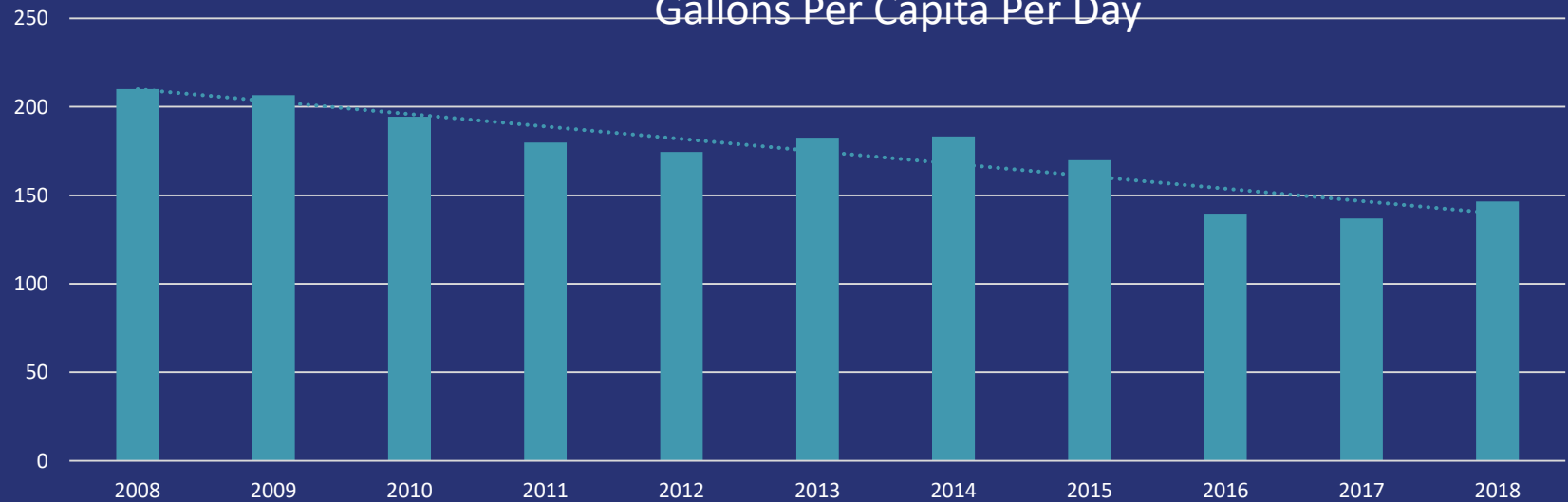




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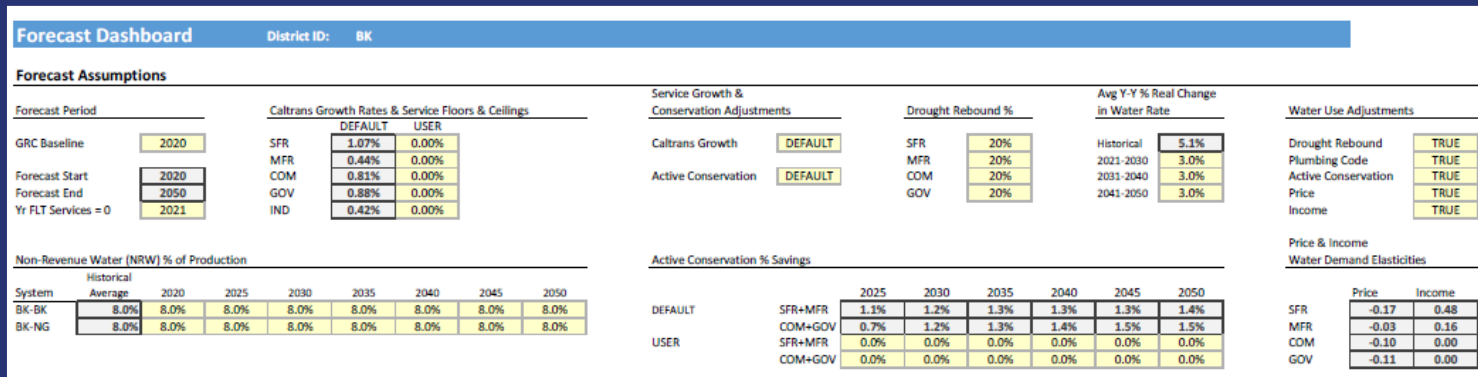
California Water Service  
Gallons Per Capita Per Day



# Integrated Planning



# Integrated Planning



# Regulatory





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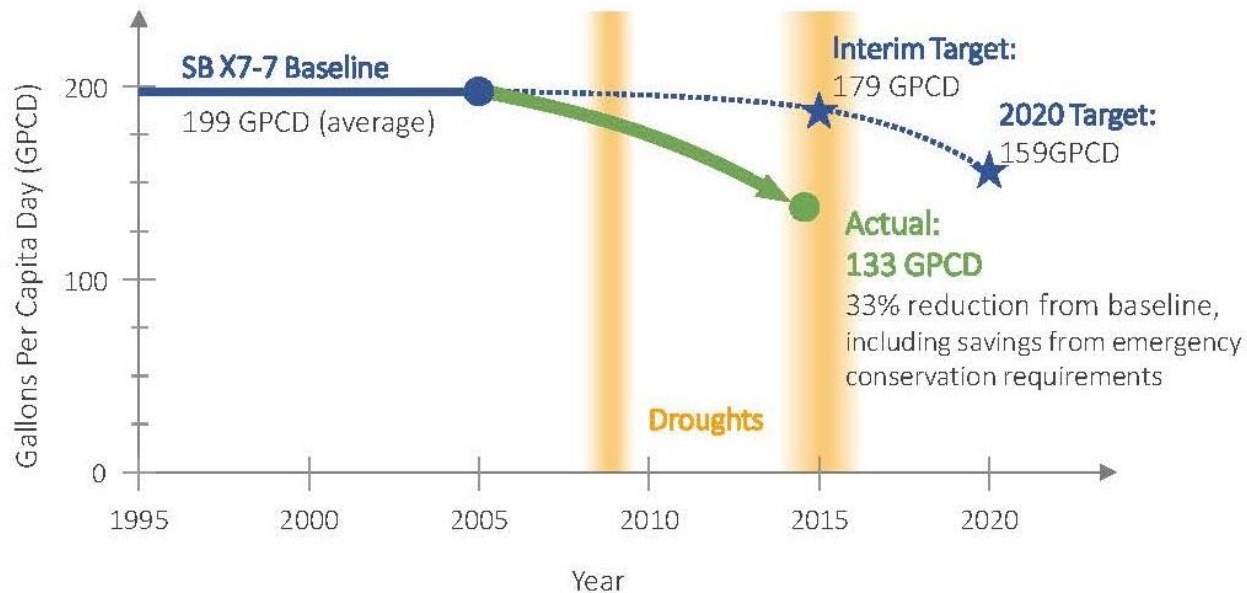
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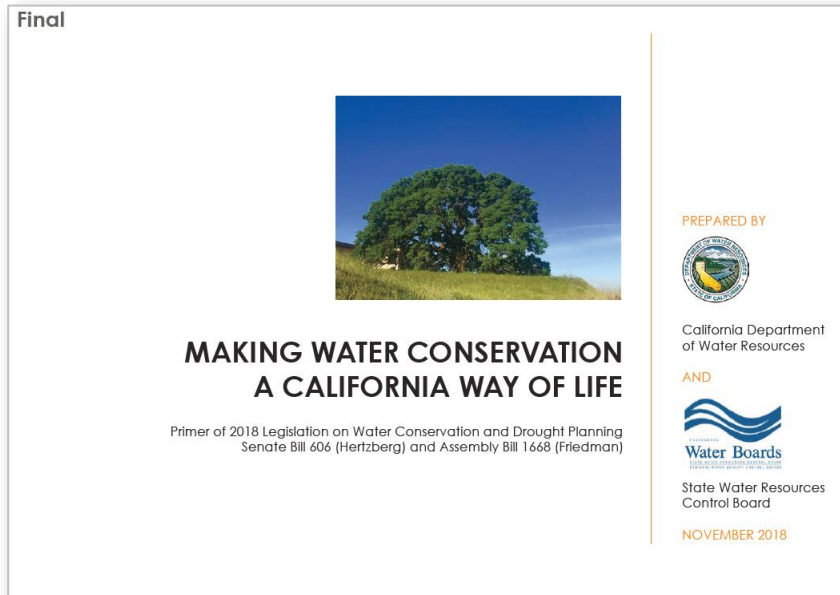


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  - **CII Landscape Irrigation with dedicated meters (2022)**
  - **Water Loss Standard (2020)**
  - **Variances (e.g., seasonal pop.; recycled water; evap. coolers)**

<sup>1</sup> Urban Water Suppliers; defined as utilities with more than 3,000 service connections or more than 3,000 acre-feet per year.





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# Indoor Residential Standard

- Indoor Standard Set in Statute
  - 55 gpcd until 1/1/2025
  - 52.5 gpcd until 1/1/2030
  - 50 gpcd after 1/1/2030
- Dept. of Water Resources completes indoor water use study and report, with recommendations to legislature by 1/1/2021







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    - Water allowance approach





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# Water Loss Standard

- Per a 2015 law, Water Board must set water loss performance standards by July 1, 2020
- Formal rulemaking to begin in July 2019
  - Based on AWWA M36 Manual
  - CEQA Review
  - Economic Analysis





# Water Use Target Example

Sector	Budget <sup>1</sup> (GPCD)	Budget Volumes		
		(Gallons)	(Ccf)	(acre-feet)
Residential Indoor Use	55	3.419 billion	4,570,856	10,493
Outdoor Irrigation Use	45	2.797 billion	3,739,305	8,585
Water Loss	6	373 million	498,663	1,145
<b>Target</b>	<b>106</b>	<b>6.590 billion</b>	<b>8,809,682</b>	<b>20,223</b>

Notes: <sup>1</sup>Budget calculations based on the following: Service area population = 170,319 (approx. 50,000 service connections); 325,851 gal/af; 748 gal/Ccf; Days per year = 365



- Primary Regulator
  - State Water Resources Control Board (SWRCB)
    - All urban water suppliers (public, private, regulated IOU)
  - California PUC (regulated water IOUs)
- Progressive Approach
  - NOVs and Information Orders (warning letters)
  - Conservation Orders (add'l requirements for compliance)
  - Administrative Civil Liability (fines; e.g., \$1,000/day)





# Implications for CPUC

- Reconcile drought management requirements with CPUC Tariff Rule 14.1
- Reconcile future test year sales forecasts with required annual budgets
  - What to do if budget target (plus CII use) is (much) more or less than adopted sales forecast in most recent GRC
    - Higher = lower rates in test year
    - Lower = higher rates in test year, but must resolve conflict w/SWRCB enforcement







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# Questions



**Jack Hawks**  
**[jhawks@calwaterassn.com](mailto:jhawks@calwaterassn.com)**







# Variances: Unique Water Uses

Variances and thresholds of significance will be developed for each of the following unique water uses:

Evaporative  
coolers

Horses and other  
livestock

Seasonal  
populations

Landscaped areas  
irrigated with  
recycled water

Soil compaction  
and dust control

Ponds and lakes to  
sustain wildlife

Irrigation of  
vegetation for fire  
protection

Agricultural use

Others TBD





# The Utility Budget

## Calculating Urban Water Use Objective

### Urban Retail Water Supplier's Urban Water Use Objective (CWC §10609.20(c))

Aggregate estimated efficient indoor residential water use



Aggregate estimated efficient outdoor residential water use



Aggregate estimated efficient outdoor irrigation of landscape areas with dedicated irrigation meters or equivalent technology in connection with CII water use



Aggregate estimated efficient water losses



Aggregate estimated water use for variances approved by the State Water Board



### Allowable Bonus Incentive Adjustments (CWC §10609.20(d))

Volume of potable reuse water from existing facility, with completed environmental review by January 1, 2019, that becomes operational by January 1, 2022, not to exceed

**15% of urban water use objective**



Volume of potable reuse water from new facility, not to exceed

**10% of urban water use objective**



Urban Retail Water Supplier's "adjusted" urban water use objective for annual reporting purposes and comparison to the actual water use in the previous year

