

May 30, 2018

State Water Resources Control Board
Felicia Marcus, Chair
1001 I Street
Sacramento, CA 95814

Subject: 2017 Electronic Annual Reporting

Dear Chair Marcus and Board Members:

We believe there is great opportunity for the State Water Resources Control Board (State Board) and water suppliers to work together to jointly improve water supply reliability, affordability, sustainability and water quality. Included in the effort, should be partnering together to collect and analyze relevant and appropriate data to inform and assist with sound water management decisions. On March 19, 2018, State Board staff held a webinar introducing new content to be added to the 2017 electronic Annual Report (2017 eAR). This new content was developed without an open and transparent stakeholder process, and requested without the appropriate advanced notice required to collect accurate information. This short-notice and one-sided approach to data collection limits the value of the data collected and is counterproductive to stakeholder processes currently in place. All in all, much of the new data request in the 2017 eAR should be collected via a different mechanism through the existing stakeholder process and not through a compliance report channel. We respectfully ask you to consider our comments and take steps necessary to improved data collection efforts so that the State Board and water suppliers can partner together effectively to achieve mutually shared objectives.

The electronic Annual Report

The eAR is not currently the best vehicle to gather relevant and informative data about water rates, affordable drinking water, water loss from distribution systems, and climate change adaptation strategies and resiliency for water utilities. The new content requested in the 2017 eAR lacks a nexus to the stated purpose of and the authority cited for the annual report. Water supplier staff and managers most familiar with the annual report from previous submittals may not be familiar with the issues and data being requested in the new content, and consequently may not be the best source for understanding and providing the relevant data. There is also a concern about the frequency of data collection. The annual collection and reporting of requested information on water loss and climate change serves no reasonable purpose, since much

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of the requested information does not change significantly from year to year. Therefore, the eAR is not the best tool to use for this type of data collection.

Timing of Data Requests

To improve accuracy and relevancy of data collected, adequate advanced notification is required prior to requesting new data. The timing of the current request limits the availability of accurate and useful data. The new data request in the 2017 eAR was neither collected nor tracked appropriately for the purpose of the 2017 eAR by water suppliers last year. Water suppliers need to know in advance what data will be required for a given year in order to collect accurate and relevant data. Any data collected, even if provided in the 2017 eAR, should not be used to inform policy or regulation by the State Board or other state agencies. Accordingly, the same data request for 2018 will also not produce accurate data, since suppliers did not have the opportunity to start collecting information prior to April 2018. Even after learning of the new data requests, many agencies do not have systems or staff resources in place to collect requested data immediately. Any proposed changes in data requests should be communicated well in advance of the time period the State Board desires to request data to improve accuracy and availability.

Data Request Process

Using a stakeholder process will help improve the acquisition of relevant and meaningful data, as well as improving data accuracy and availability. An open, transparent and meaningful two-way stakeholder process will help the water community understand the need, purpose, and level of significance of new data requests by the State Board. The information gathered through the stakeholder process will be helpful in explaining to decision makers at the local level why the State Board is asking for such information. It will also help explain why increasing costs to local agencies and their customers is necessary to acquire that data. A stakeholder process will improve the value of information collected, reduce the possibility of misinterpretation and/or misunderstanding by both those providing the data and those interpreting the data.

There are currently stakeholder processes in place, with appropriate water supplier staff participating, addressing both water loss and affordable drinking water. There are also proposed changes to Urban Water Management Plans to address climate change. This latest data request in the eAR represents a potential duplication of effort. Stakeholder driven processes should be utilized to improve the quality and quantity of data collected and to economize the staff time invested in data collection while minimizing the duplicate/redundant efforts for information collection.

The entire water community should be working together jointly to improve water supply reliability, affordability, sustainability and water quality. Water suppliers have proved a willingness to provide reasonable and relevant information. This is demonstrated each month as the large majority of water suppliers voluntarily supply water use and efficiency information to the State Board. Moving forward, any data requests should be well-formulated and amply vetted through an open and transparent stakeholder process. The current one-sided closed process is unlikely to result in improved data quality or a better informed process. We ask that you work with us in a stakeholder driven process to identify relevant and necessary information required for a clearly stated purpose and that will not be duplicative of other reporting efforts.

Thank you for considering our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Carlin".

Michael Carlin
Deputy General Manager

- c: Steven Moore, Vice Chair, State Water Resources Control Board
Tam Doduc, Board Member, State Water Resources Control Board
Dorene D'Adamo, Board Member, State Water Resources Control Board
Eileen Sobeck, Executive Director, State Water Resources Control Board
Eric Oppenheimer, Chief Deputy Director, State Water Resources Control Board
James Nachbaur, Director of Office Research, State Water Resources Control Board
Max Gomberg, Climate and Conservation Manager, State Water Resources Control Board