

April 29, 2022

Advice Letter No. 1880-W

(U 133 W)

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Golden State Water Company (GSWC) hereby transmits this advice letter to request activation of Stage 2 of its Schedule 14.1, Water Shortage Contingency and Staged Mandatory Water Conservation and Rationing in its Claremont Customer Service Area (CSA).

Purpose

In accordance with the provisions of Chapter 3, Division 1, of the Water Code of the State of California and the California Public Utilities Commission's Standard Practice U-40, GSWC is seeking authority to activate Stage 2 of its Schedule 14.1, Water Shortage Contingency and Staged Mandatory Water Conservation and Rationing in its Claremont CSA.

Background

On August 20, 2021, GSWC filed Advice Letter 1862-W with the Commission to establish the Schedule 14.1 Water Shortage Contingency and Staged Mandatory Water Conservation and Rationing tariffs and activate Stage 1 (15%) voluntary conservation in various Customer Service Areas, which included Claremont. Advice Letter 1862-W was approved with an effective date of September 19, 2021.

On March 18, 2022, the California Department of Water Resources (DWR) announced that it reduced the calendar year 2022 State Water Project (SWP) allocation to five percent.

DWR has limited supply of water available for SWP contractors to utilize for Human Health and Safety (HH&S) but that access to HH&S water requires: the contractor to demonstrate robust conservation efforts with mandatory requirements; the repayment of all HH&S water in future years; and future investments to reduce reliance on the SWP to meet HH&S needs.

Metropolitan Water District of Southern California (MWD) announced that, in light of the five percent SWP allocation there are insufficient supplies to meet normal demands in SWP dependent areas in calendar year 2022, even with the utilization of HH&S water.

On March 28, 2022, Governor Newsom issued Executive Order (EO) N-7-22 calling on each urban water supplier to implement actions to reduce water usage by 20-30 percent, depending on local conditions. The EO N-7-22 also directed the Water Board to consider adopting emergency regulations to prohibit watering “non-functional turf”, or turf that serves only ornamental purposes, in the commercial, industrial, and institutional sectors during the ongoing drought emergency to conserve water supplies.

On April 26, 2022, MWD declared a Water Shortage Emergency Condition and adopted an Emergency Water Conservation Program to reduce non-essential uses of water and preserve available water supplies. The program will:

- a. limit outdoor water to one-day-per week in the areas that depend on SWP supply with a provision to move to zero outdoor watering on September 1, 2022 based on conditions;
- b. require those member agencies whose service areas encompass all or a portion of the SWP Dependent Area to adopt and implement effective enforcement mechanisms to ensure compliance with this limit; and
- c. impose volumetric penalties of up to \$2,000 per acre-foot for non-compliance.

The one-day-per-week watering limitation would be effective immediately; any penalties for non-compliance would be assessed beginning June 1, 2022. In order to avoid volumetric penalties for water used beginning in June, the urban water suppliers will need to adopt and begin enforcement of the restrictions by May 31, 2022.

At its April 20, 2022 meeting, the Three Valleys Municipal Water District (TVMWD) board voted to move to a Water Shortage Contingency Plan (WSCP) – Level 5 in its SWP constrained areas, urging up to 50% reduction in water use in these particular areas. The constrained area of TVMWD includes the cities of Claremont and La Verne.

Agencies that currently receive SWP supplies at connections within the constrained SWP Dependent Area must implement and enforce a restriction on outdoor watering of no more than one day per week. Hand watering of trees would be exempt from the one-day-per-week restriction, along with drip irrigation systems and established fire hazard zones. A copy of TVMWD’s approved Resolution No. 22-04-928 is attached to this advice letter filing.

TVMWD’s request for mandatory water conservation will require that GSWC’s customers in the Claremont CSA decrease water usage by 20 percent, from their usage during the same month in 2020, in order for GSWC to satisfy TVMWD’s mandate.

Request

In response to (EO) N-7-22 to reduce water usage by 20-30% and to achieve MWD's reduction of non-essential water use and preserve water supplies, GSWC is seeking to activate and implement Stage 2 - 20% Mandatory Reduction, in its Schedule 14.1 in the Claremont CSA. Activation of Stage 2 will trigger GSWC's authority to impose drought emergency surcharges.

In accordance with MWD's Emergency Water Conservation Program and TVMWD's restrictions to limit non-essential outdoor water use to preserve available water supply for the greatest public benefit, customers in Claremont will be required to limit outdoor water use to **one-day-per week starting on June 1, 2022 and potentially to no outdoor watering later in the year should MWD, and subsequently TVMWD, limit all non-essential outdoor watering**. GSWC will coordinate with the local government agencies and adhere to city ordinance restrictions to achieve the required reductions of water use.

GSWC will identify customers within Fire Hazard Severity Zones in its Claremont customer service area and will establish an allocation based on historical usage and monitor monthly usage to ensure customers stay within allocation.

In order to achieve the water conservation goal, GSWC customers who are not currently meeting the mandatory 20% reduction in water use will be charged a drought emergency surcharge of \$2.50 per Ccf for all usage in excess of the customer's billing allocation (compared to 2020); as listed in Stage 2 of Schedule 14.1. All monies collected will be tracked in the Water Revenue Adjustment Mechanism (WRAM).

On August 5, 2021, GSWC established the 2021 Water Conservation Memorandum Account (2021WCMA), via Advice Letter 1861-W. The 2021WCMA will track all expenses to implement Rule No. 14.1 and Schedule 14.1 for Claremont that have not been included in a General Rate Case or other proceedings.

The 2021WCMA will also record monies paid by customers for fines, penalties, or other compliance measures associated with water use violations, the revenue shortfall associated with the conservation measures on GSWC's quantity revenues, excluding revenues generated from GSWC's Recycled Water tariffs, that are not covered by the WRAM.

Customer Outreach and Noticing

GSWC will follow all guidelines including customer outreach and noticing guidelines specified in the CPUC's Division of Water and Audit's Standard Practice U-40-W on Instructions for Water Conservation Rationing and Service Connection Moratoria, which include customer outreach and noticing before the implementation of each rationing stage.

GSWC will notify its customers of the triggered Stage 2 activation of Schedule 14.1 through bill insert, direct mailing or electronic notification. Additionally, GSWC will also provide periodic bill messages regarding updates on the status of water supply conditions and the results of customers' conservation efforts.

Public Meeting

As required by Section 351 of the California Water Code, GSWC held a public meeting on September 7, 2021 for its Claremont customers to obtain public comments on the proposed Schedule 14.1 and help customers understand the associated enforcement measures related to the Water Shortage Contingency and Staged Mandatory Water Conservation and Rationing plan. Since it has been less than 12 months since the public meeting in Claremont, the activation of Stage 2 will not require another public meeting.

Tier Designation

This advice letter has a Tier 2 designation. GSWC is requesting that this filing become effective on June 1, 2022.

Response or Protest

Anyone may submit a response or protest for this AL. When submitting a response or protest, **please include the utility name and advice letter number in the subject line.**

A **response** supports the filing and may contain information that proves useful to the Commission in evaluating the Advice Letter (AL). A **protest** objects to the AL in whole or in part and must set forth the specific grounds on which it is based. These grounds are:

1. The utility did not properly serve or give notice of the AL;
2. The relief requested in the AL would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
3. The analysis, calculations, or data in the AL contain material error or omissions;
4. The relief requested in the AL is pending before the Commission in a formal proceeding; or
5. The relief requested in the AL requires consideration in a formal hearing, or is otherwise inappropriate for the AL process; or
6. The relief requested in the AL is unjust, unreasonable, or discriminatory, provided that such a protest may not be made where it would require re-litigating a prior order of the Commission.

A protest may not rely on policy objections to an AL where the relief requested in the AL follows rules or directions established by statute or Commission order applicable to the utility. A protest shall provide citations or proofs where available to allow staff to properly consider the protest.

WD must receive a response or protest via email (or postal mail) within 20 days of the date the AL is filed. When submitting a response or protest, **please include the utility name and advice letter number in the subject line.**

The addresses for submitting a response or protest are:

Email Address:

Water.Division@cpuc.ca.gov

Mailing Address:

CA Public Utilities Commission
Division of Water and Audits
505 Van Ness Avenue
San Francisco, CA 94102

On the same day the response or protest is submitted to WD, the respondent or protestant shall send a copy of the protest to Golden State Water Company at:

Email Address:

regulatoryaffairs@gswater.com

Mailing Address:

Golden State Water Company
Attn: Gladys Estrada
630 East Foothill Blvd.
San Dimas, CA 91773

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform DWA, within the 20 day protest period, so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.

Replies

The utility shall reply to each protest and may reply to any response. Any reply must be received by WD within five business days after the end of the protest period, and shall be served on the same day on each person who filed the protest or response to the AL.

The actions requested in this advice letter are not now the subject of any formal filings with the California Public Utilities Commission, including a formal complaint, nor action in any court of law.

Sincerely,

/s/ Gladys Estrada

Gladys Estrada

Regulatory Analyst

c: Jim Boothe, CPUC - Water Division
Victor Chan, CPUC- CalPA
Richard Rauschmeier, CPUC- CalPA
Jeremy Ho, CPUC- Water Division

Si necesita asistencia en Español, tenemos representantes de servicio al cliente disponibles para ayudarle cuando lo solicite, por favor llame al número 1-800-999-4033.

NOTICE OF STAGE 2 MANDATORY WATER CONSERVATION AND RATIONING

Golden State Water Company (GSWC) filed an Advice Letter with the California Public Utilities Commission (CPUC) to activate Stage 2 in the Schedule 14.1 Staged Mandatory Water Conservation and Rationing in its Claremont and Simi Valley customer service areas. Schedule 14.1 provides information on restrictions, water allocations, enforcement measures and surcharges that will help to achieve reductions due to water supply shortages or to achieve identified water usage goals established by an authorized government agency or official.

On March 28, 2022, Governor Newsom issued Executive Order N-7-22 calling on each urban water supplier to implement actions to reduce water usage by 20-30 percent, depending on local conditions. The Executive Order also directs the Water Board to consider adopting emergency regulations to prohibit watering “non-functional turf,” or turf that serves only ornamental purposes, in the commercial, industrial, and institutional sectors during the ongoing drought emergency to conserve water supplies.

Additionally, The Metropolitan Water District of Southern California (MWD) imposed restrictions to limit non-essential outdoor water use to one day per week to preserve available water supply for the greatest public benefit. Customers that reside in areas that receive water through MWD (Simi Valley and Claremont) will need to restrict usage to **one day per week** watering.

All restrictions will require water consumers to reduce usage as compared to the amount they used in 2020.

In response to the Governor’s Executive Order, and to achieve MWD’s reduction of non-essential water use and preserve water supplies, GSWC will implement Stage 2 Mandatory Water Conservation and Rationing in its Claremont and Simi Valley service territories requesting 20% mandatory reduction in customer usage. Customers in these areas will be required to limit outdoor water use to **one day per week starting on June 1, 2022 and potentially to no outdoor watering later in the year should a local water agency or local city ordinance limit all non-essential outdoor watering.**

In order to achieve the water conservation goals from all customers, GSWC customers who are not currently meeting the mandatory 20% reduction will be charged a drought emergency surcharge of \$2.50 per Ccf for all usage in excess of the customer’s billing allocation (compared to 2020), as listed in Stage 2 of Schedule 14.1 below:

MANDATORY WATER USE REDUCTION AND DROUGHT EMERGENCY SURCHARGES

Stage 1

Stage 1 is a “Water Alert” where voluntary conservation is encouraged.

Outdoor irrigation is restricted to three days per week:

Addresses Ending In:	Watering Days:
Even Numbers (0, 2, 4, 6, 8):	Sunday, Wednesday, Friday
Odd Numbers (1, 3, 5, 7, 9):	Tuesday, Thursday, Saturday

All outdoor irrigation must occur between the hours of 7 pm - 8 am.

Failure to comply with these restrictions may result in the installation of a flow restrictor device along with associated fees for installation and removal.

If conditions warrant, GSWC will change the number of watering days and the specific day of watering after first notifying its customers in accordance with Rule 14.1.

Each subsequent Stage will be implemented if the preceding Stage allocations and drought emergency surcharges are deemed insufficient to achieve reductions due to water supply shortages or to achieve identified water usage goals established by an authorized government agency or official.

In addition to the restrictions identified in Stage 1, the following allocations and drought emergency surcharges are in effect for **Stages 2-6**:

1. Outdoor irrigation is restricted to two days per week:

Addresses Ending In:	Watering Days:
Even Numbers (0, 2, 4, 6, 8):	Sunday, Wednesday
Odd Numbers (1, 3, 5, 7, 9):	Tuesday, Saturday

2. All customers will have their baseline established using the 2020 usage data for their premise or an area wide average baseline for similar usage if 2020 data does not exist (e.g. new customer accounts).

3. The customer’s allocation will be based on the 2020 baseline less the mandatory reduction % per stage.

- Stage 2 - 20% mandatory reduction (Moderate Shortage)
- Stage 3 - 30% mandatory reduction (Severe Shortage)
- Stage 4 - 40% mandatory reduction (Critical Shortage)
- Stage 5 - 50% mandatory reduction (Shortage Crisis)
- Stage 6 - 55% mandatory reduction (Emergency Shortage)

4. No allocation will be set at less than eight (8) Ccf per monthly billing period or sixteen (16) Ccf per bi-monthly billing period.

5. All usage in excess of the customer's allocation will be charged at the regular rate plus a drought emergency surcharge as follows:

- Stage 2 - \$2.50 per ccf
- Stage 3 - \$5.00 per ccf
- Stage 4 - \$7.50 per ccf
- Stage 5 - \$10.00 per ccf
- Stage 6 - \$15.00 per ccf

FLOW RESTRICTOR CHARGES

The charge for the installation and removal of a flow-restricting device shall be:

- 5/8" to 1": \$150
- 1 1/2" to 2": \$200
- 3" and larger: \$300

The flow restrictor will remain installed for a minimum of 7 days.

EXEMPTION AND APPEALS PROCESS

Any customer who seeks a variance from any of the provisions of this voluntary water conservation and mandatory rationing plan shall notify the GSWC in writing using the Appeals Form, explaining in detail the reason for such a variance. GSWC will evaluate each request based on the standard for efficient water usage, considering similar customers and meter size, and respond in writing.

The Appeals Form is available online at GSWC website: www.gswater.com/appeal or by calling 1-800-999-4033.

Any customer not satisfied with GSWC's response may file an appeal with the Director of the CPUC's Water Division.

If the customer disagrees with such disposition, the customer shall have the right to file a complaint with the CPUC. Except as set forth in this Section, no person shall have any right or claim in law or in equity, against GSWC because of, or as a result of, any matter or thing done or threatened to be done pursuant to the provisions of the voluntary water conservation and mandatory rationing plan.

SPECIAL CONDITIONS

1. A Tier 2 advice letter will have to be filed with the CPUC to activate any of the Stages of Mandatory Water Use Reduction and Drought Emergency Surcharges listed in this Schedule.
2. The active Stage of Mandatory Water Use Reduction and Drought Emergency Surcharges is to remain in effect until a Tier 2 advice letter is filed with the CPUC to activate a different Stage or when Schedule 14.1 is deactivated.
3. Water-use violation fines and/or Drought Emergency Surcharges must be separately identified on each bill.
4. All bills are subject to reimbursement fee set forth on Schedule No. UF.
5. All revenues collected by GSWC through water use violation fines and/or Drought Emergency Surcharges shall not be accounted for as income but shall be accumulated in the WRAM and lost revenue portion tracked in the 2021 Water Conservation Memorandum Account (2021WCMA) for non-WRAM tariffs.
6. No Customer shall use GSWC's water for non-essential or unauthorized uses as defined below:
 - a. The application of potable water to outdoor landscapes in a manner that causes runoff onto adjacent property, non-irrigated areas, private and public walkways, roadways, parking lots, or structures.
 - b. The use of a hose that dispenses potable water to wash a motor vehicle, except where the hose is fitted with a shut-off nozzle or device attached to it that causes it to cease dispensing water immediately when not in use.

- c. The use of potable water for washing buildings, structures, sidewalks, walkways, patios, tennis courts, or other hard-surfaced, non-porous areas.
- d. The use of potable water in a fountain or other decorative water feature, except where the water is part of a recirculating system.
- e. The use of potable water for watering outside plants, lawn, landscape, and turf area during certain hours prohibited by applicable laws or rules, during and up to 48 hours after measurable rainfall (0.1" or more).
- f. GSWC will promptly notify customers when aware of leaks within the customer's control; the failure to repair any leaks, breaks, or other malfunction resulting in water waste in a customer's domestic or outdoor water system within forty-eight (48) hours of notification by GSWC, unless other, specific arrangements are made with and agreed to by GSWC.
- g. The serving of water, other than upon request, in eating and drinking establishments, including but not limited to restaurants, hotels, cafes, bars, or other public places where food or drink are served and/or purchased.
- h. Hotels/motels must provide guests with the option of choosing not to have towels and linens laundered daily and prominently display notice of this option.
- i. The use of potable water for irrigation of ornamental turf on public street medians.
- j. The use of potable water for irrigation outside of newly constructed homes and buildings that is not delivered by drip or micro spray systems.
- k. Commercial, industrial, and institutional properties, such as campuses, golf courses, and cemeteries, immediately implement water efficiency measures to reduce potable water use in an amount consistent with the mandated reduction.
- l. Further Reduction in or the complete prohibition of any other use of water declared non-essential, unauthorized, prohibited, or unlawful by an authorized government or regulatory agency or official.
- m. Use of potable water for watering streets with trucks, or other vehicles, except for initial wash-down for construction purposes (if street sweeping is not feasible), or to protect the health and safety of the public.
- n. The outdoor irrigation restriction does not apply to trees or edible vegetation watered solely by drip or microspray systems.

If you need additional information, or a copy of the Advice Letter you may visit GSWC's website at www.gswater.com or call the GSWC's 24-hour Customer Service Center, toll free, at 1-800-999-4033, TTY 1-877-933-9533.


GOLDEN STATE WATER COMPANY

ATTACHMENT



Board of Directors Staff Report

To: TVMWD Board of Directors

From: Matthew H. Litchfield, General Manager 

Date: November 17, 2021

Subject: **Adopt Resolution No. 2-04-928 Implementing the Water Shortage Contingency Plan Level 5 in its State Water Project Constrained Areas**

<input checked="" type="checkbox"/> For Action	<input type="checkbox"/> Fiscal Impact	\$
<input type="checkbox"/> Information Only	<input type="checkbox"/> Funds Budgeted:	

Staff Recommendation:

1. **Approve Resolution No. 22-04-928 Implementing the Water Shortage Contingency Plan Level 5 in its State Water Project constrained areas;**
2. **Direct staff to take appropriate actions as outlined in the adopted TVMWD Plan; and**
3. **Direct staff to take appropriate actions consistent with the measures outlined by Metropolitan Water District of Southern California in its Water Shortage Emergency Condition in SWP constrained area declaration.**

Discussion:

The state of California is currently entering its third year of drought. The past two water years (WY) have been characterized by record breaking temperatures and extremely dry soils, which has led to large and unexpected reductions in runoff from the State's snowpack. Similar prolonged drought conditions have pushed water levels in Lake Mead to historic lows, triggering the first ever shortage condition on the Colorado River in August 2021.

After a record dry start to 2022, the California Department of Water Resources announced on March 18, 2022, that the State Water Project (SWP) allocation was reduced from 15 to five percent. Subsequently on March 23, 2022, DWR issued requirements to SWP contractors who intend to take delivery beyond the five percent to meet human health and safety needs also need to implement robust conservation efforts with mandatory requirements. Based on the current Metropolitan Water District of Southern California's (Metropolitan) distribution system, Metropolitan will be challenged to meet demands in SWP constrained areas (areas that can only receive State Water Project supplies and do not have connections to Colorado River supply).

On March 28, 2022, through Executive Order N-7-22, Governor Gavin Newsom called upon each urban water supplier per California Water Code section 10632 to adopt shortage levels between twenty and thirty percent based on local conditions.

Metropolitan's Response to Dry Conditions:

Due to the depth and duration of the current drought, staff projects that Metropolitan will not be able to meet normal demands in the SWP Dependent Area utilizing existing resources. Despite best efforts to maximize available resources and operational flexibility this year, Metropolitan must seek additional human health and safety water allocated from DWR.

When a regional shortage exists, Metropolitan enacts its Water Supply Allocation Plan (WSAP). The WSAP establishes baseline usage, regional shortage levels, and a surcharge for a member agency's aggregate water use above a predetermined allotment. Metropolitan staff determined that the WSAP, with its regional focus, could not effectively or efficiently alleviate the circumstances of this current emergency. Rather than modifying or reconstructing the WSAP for this rapidly developing emergency condition, Metropolitan has proposed to reduce or eliminate nonessential uses in the SWP constrained areas. These non-essential uses (e.g., water for outdoor landscapes, filling swimming pools or fountains, or washing cars) could be curtailed through either price or non-price mechanisms.

Metropolitan has proposed a Framework for the Emergency Water Conservation Program that initially focuses on non-price mechanisms to reduce outdoor watering. The proposed Emergency Water Conservation Program includes three main elements to achieve the goal of lowering normal demand and preserving water for human health and safety purposes:

1. Each member agency that currently receives SWP supplies at the connections within the SWP Dependent Area must implement and enforce a restriction on outdoor watering of no more than one day per week (and outdoor watering may later be completely banned). Metropolitan will require that member agencies limit watering times to 8 minutes per station (for most irrigation systems) to prevent substitution of water use from newly banned days to permitted days. Hand watering of trees would be exempt from the one-day-per-week restriction.
2. If a member agency either does not submit an acceptable plan to limit outdoor watering or if it inadequately enforces the plan, a penalty of up to \$2,000 per acre-foot shall be assessed on all SWP supplies delivered to that non-compliant agency at the designated connections. Importantly, for wholesale member agencies, the penalty would apply only to that portion of water delivered to one or more of their non-compliant retail agencies. The penalty would not be applied to the full delivery to the wholesale member agency if only a portion of its retailers were non-compliant.
3. An agency can entirely avoid these outdoor watering restrictions and penalties if it takes sufficient action to entirely eliminate its use of SWP supplies at the designated connections.

Metropolitan is continuing to collaborate with its member agencies before the final framework is provided to the Metropolitan Board's consideration for action on April 26, 2022. Each wholesale/urban water supplier is required to have the mandatory restrictions in place by May

31, 2022. Detailed information pertaining to the various requirements and program support is included as Exhibit B to this staff report.

Analysis:

As part of the 2020 Urban Water Management Plan (UWMP) process, TVMWD adopted its Water Shortage Contingency Plan (WSCP). TVMWD's WSCP contains six shortage levels ranging from "up to 10%" (Level 1), to "a shortage of greater than 50%" (Level 6). TVMWD previously took actions to declare a Water Supply Alert on September 15, 2021 and activated its Water Shortage Contingency Plan Level 2 on November 17, 2021 in response to the increasing severity of the drought conditions.

At this time, based on the current limited supply availability of the SWP supplies and to ensure that such supplies are extended to the maximum extent feasible, a Level 5 of the WSCP is recommended to reduce outdoor irrigation to one day per week to meet the required "robust conservation efforts" needed to continue taking delivery of the human health and safety needs SWP supplies.

A **Level 5 WSCP** would trigger the following actions:

- TVMWD notifying its member agencies that due to drought a consumer imported demand reduction of up to 50% is necessary to make more efficient use of water and respond to existing water conditions if the member agencies take deliveries of State Water Project supplies from any of its connections
- Following TVMWD's WSCP Communications protocols for Level 5 including:
 - Announcing the status change to the member agencies and promoting immediate actions at the retail level
 - Increased activities related to outreach and messaging on the district website and member agency conservation coordinators microsite
 - Enhanced promotion of on-going Water Use Efficiency programs and tools
 - Conducting briefings with elected officials and key civic/business leaders
 - Enhanced coordination with member agencies on conservation programming
 - Analysis of data to determine any appropriate supplemental actions

The activation of TVMWD's WSCP is separate and apart from any activation of TVMWD's Water Supply Allocation Plan (WSAP). At this time, TVMWD staff does not anticipate activating the WSAP in the foreseeable future.

Strategic Plan Objective(s):

1.3 – Maintain diverse and environmentally responsible sources of water supplies and storage

1.5 – Prepare for long-term MWD shutdown or catastrophic event that affects operations

3.3 – Be accountable and transparent with major decisions

Attachment(s):

Exhibit A – Resolution No. 22-04-928

Exhibit B – Metropolitan Water District of Southern California Staff Report 04/12/2022 Water Shortage Emergency Condition in SWP Dependent areas

Meeting History:

None

NA/ML

RESOLUTION NO. 22-04-928

RESOLUTION OF THE BOARD OF DIRECTORS OF THREE VALLEYS MUNICIPAL WATER DISTRICT DECLARING A WATER SHORTAGE LEVEL 5 IN ITS STATE WATER PROJECT CONSTRAINED AREAS AND CALLING FOR ENHANCED WATER USE EFFICIENCY EFFORTS

WHEREAS, Three Valleys Municipal Water District (Three Valleys/District) is responsible for providing reliable, high quality supplemental water to the communities of Pomona, Walnut and Eastern San Gabriel Valleys;

WHEREAS, Three Valleys is reliant upon deliveries of water imported by the Metropolitan Water District of Southern California (Metropolitan) from the California State Water Project (SWP) and Colorado River water; and portions of the District's service area is considered a SWP constrained within the Metropolitan service area wherein the area can only receive supplies from the SWP; and

WHEREAS, climate change continues to intensify the impacts of droughts on our communities, environment, and economy, and California is entering its third consecutive year of dry conditions, resulting in continuing drought in all parts of the State; and

WHEREAS, on July 8, 2021, through Executive Order N-10-21, Governor Gavin Newsom expanded the drought emergency declaration to include a total of 50 counties across the state, and called on all Californians to voluntarily reduce their water use by 15 percent from 2020 levels; and

WHEREAS, the U.S. Bureau of Reclamation has found that 2008 to 2018 was the driest period for the Colorado River Basin in more than 100 years of record keeping; and on August 16, 2021, issued its first ever shortage declaration for the Colorado River System; and

WHEREAS, on August 17, 2021, Metropolitan issued a Condition 2 Water Supply Alert calling for conservation through drought ordinances and other measures; and

WHEREAS, on November 17, 2021, Three Valleys adopted Resolution No. 21-11-909 activating TVMWD's Water Shortage Contingency Plan at a Level 2; and

WHEREAS, on March 18, 2022, after a record dry start to 2022, the California Department of Water Resources announced that the State Water Project allocation was reduced to five percent warning residents to brace for a third year of drought; and on March 23, 2022, required SWP contractors who took SWP delivery beyond the five percent to meet human health and safety needs also need to implement robust conservation efforts with mandatory requirements; and

WHEREAS, on March 28, 2022, through Executive Order N-7-22, Governor Gavin Newsom called upon each urban water supplier per California Water Code section 10632 to adopt shortage levels between twenty and thirty percent based on local conditions; and

WHEREAS, Metropolitan has indicated its intent to declare water shortage emergency condition in SWP constrained areas within its service area calling for reduction of non-essential uses of water and preserve available supplies for the greatest public benefit; and has also indicated

its intent to require its member agencies in the SWP constrained area to adopt and implement effective enforcement mechanisms to ensure compliance with DWR requirements; and

WHEREAS, the current extreme statewide drought condition, and SWP constraints serve to underscore the need for enhanced conservation measures to maintain reliable supplies during prolonged water shortages; and

WHEREAS, increasing and applying efficient water use habits today is the responsible action and will help ensure the Three Valleys Municipal Water District service area has enough water to maintain our quality of life and thriving economy; and

WHEREAS, the Board of Directors of Three Valleys Municipal Water District has adopted a Water Shortage Contingency Plan in accordance with California law, which is triggered during water shortage conditions and describes stages of actions the District may take to manage demand and allocate available supplies.

NOW, THEREFORE, IT IS HEREBY RESOLVED that the Board of Directors of Three Valleys Municipal Water District, in accordance with its Water Shortage Contingency Plan, hereby declares that a Water Shortage Contingency Plan Level 5 exists in portions of its service area that use any portion of State Water Project supplies.

BE IT FURTHER RESOLVED that until such time the Three Valleys Municipal Water District Board of Directors determines that the water shortage emergency condition for SWP constrained area no longer exists, all potable water customers residing in areas that use State Water Project are requested to:

1. Limit watering landscape or other vegetated areas with potable water to a minimum of either two days or one day per week (based on local water supplier needs and established requirements). Limitations may also include time restrictions for watering per day depending on the severity of the water supply shortages. Hand watering of trees would be exempt from the one-day per week restriction;
2. Inspect all systems leaks, breaks or other malfunctions and repair within 72 hours of notification by the District; and
3. Prohibit the filling or re-filling of ornamental lakes or ponds, except to the extent needed to sustain aquatic life, provided that such animals are of significant value and have been actively managed within the water feature prior to declaration of a supply shortage level.

BE IT FURTHER RESOLVED that Three Valleys Municipal Water District will pass on any penalties and fines that it receives to its respective member agencies consistent with Metropolitan's Water Shortage Emergency Condition declaration; and

BE IT FURTHER RESOLVED that Three Valleys Municipal Water District encourages water users within its entire service area to reduce their use of water by thirty percent and implement feasible water use efficiency measures in an effort to extend stored water supplies and minimize effects associated with drought conditions exacerbated by climate change; and

BE IT FURTHER RESOLVED that Three Valleys Municipal Water District will coordinate with Metropolitan and its member agencies to develop a common regional message and accelerate its outreach efforts in order to communicate the need for additional water use efficiency efforts to the affected SWP constrained areas within Three Valleys' service area; and

BE IT FURTHER RESOLVED that Three Valleys Municipal Water District encourages all local water agencies, cities, and the County of Los Angeles to join in this call for enhancing water use efficiency efforts through the adoption of appropriate resolutions or ordinances in their jurisdictions.

ADOPTED and **PASSED** at a meeting of the Three Valleys Municipal Water District's Board of Directors held both in person and via teleconference, on this 20th day of April 2022 by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

Jody Roberto, President

ATTEST:

Carlos Goytia, Secretary

SEAL:



- Board of Directors
Water Planning and Stewardship

4/12/2022 Board Meeting

9-2

Subject

Information on a proposed Water Shortage Emergency Condition and Emergency Water Conservation Program to Preserve Metropolitan's Supplies in the State Water Project-Dependent Areas

Executive Summary

As a result of record drought in California and extremely limited State Water Project (SWP) allocations, staff projects there will be insufficient supplies this year to meet the anticipated demands in areas staff has identified as the current SWP-dependent portions of Metropolitan's service area ("SWP Dependent Area"). Therefore, staff is proposing that the Board take the following actions to reduce demands and preserve supplies in this area:

1. Express support for the Governor's Executive Order N-7-22 on March 28, 2022, calling for all urban water suppliers to implement actions to reduce water use by 20-30 percent, depending on local conditions.
2. Declare that a Water Shortage Emergency Condition exists in the SWP Dependent Area.
3. Adopt the framework for a two-phase Emergency Water Conservation Program to reduce non-essential uses of water and preserve available water supplies for the greatest public benefit in the SWP Dependent Area. The first phase of this program would:
 - a. Limit landscape watering to one day per week in the SWP Dependent Area;
 - b. Require those member agencies whose service areas encompass all or a portion of the SWP Dependent Area to adopt and implement effective enforcement mechanisms to ensure compliance with this limit; and
 - c. Impose volumetric penalties of up to \$2,000 per acre-foot for non-compliance.

The one-day-per-week watering limitation would be effective immediately; any penalties for non-compliance would be assessed beginning June 1, 2022. If needed, the second phase of this program would involve a complete ban on landscape watering to further preserve available supplies in the SWP Dependent Area, with similar penalties for non-compliance.

4. Authorize the General Manager to finalize the terms for the Emergency Water Conservation Program consistent with the Board's authorization and in conformance with the California Department of Water Resources' (DWR) requirements to access SWP water for human health and safety purposes.
5. Require the General Manager to regularly report to the Board on the effectiveness of the first phase of the Emergency Water Conservation Program and authorize the General Manager to implement the second phase of the program if deemed necessary.
6. Require the General Manager to return to the Board with proposed modifications to the Emergency Water Conservation Program should he determine that implementation of the first and second phases of the program are not adequately preserving available supplies in the SWP Dependent Area. These modifications may include using a population-based approach to set limits or targets on per capita water use.

Staff projects that water savings attained from these actions, if implemented by member agencies and other retail agencies, would preserve supply for essential human health and safety needs through the fall. However, if drought conditions persist or the water savings from these actions fall short, staff is prepared to recommend a complete ban on outdoor watering in the SWP Dependent Area.

A public hearing and Special Board Meeting is scheduled for April 26, 2022, for the Board to consider these actions, which would be taken pursuant to Water Code section 350 et seq., Water Code section 375 et seq., and other applicable authorities, and in accordance with Metropolitan's Urban Water Management Plan and Water Shortage Contingency Plan, the Governor's Executive Orders related to the drought, and recent directives from DWR concerning the use of SWP supplies.

Details

The Need to Access Human Health and Safety Supplies from the SWP

For decades, Metropolitan has worked to improve its conveyance and distribution system to ensure flexibility in delivering SWP and Colorado River water throughout much of its service area. However, due to the depth and duration of the current drought, staff projects that Metropolitan will not be able to meet normal demands in the SWP Dependent Area utilizing existing resources. Despite best efforts to maximize available resources and operational flexibility this year, Metropolitan must seek additional human health and safety water allocated from DWR.

Beginning in water year 2020 (October 1, 2019, to September 30, 2020), watersheds supplying the SWP received well below-average precipitation. DWR classified water years 2020 and 2021 as dry and critically dry, respectively. Despite substantial precipitation in October and December 2021, precipitation in Northern California from January through March 2022 fell to the driest levels on record. In addition to reduced precipitation, California's climate is warming, and the historical relationships between temperature, precipitation, and runoff are changing. In 2021, the DWR's snowmelt runoff forecast over-estimated actual runoff by 68 percent. In 2022, despite DWR estimating runoff to a highly conservative 99th percentile, runoff forecasts for the Sacramento River dropped by 27 percent, further exacerbating supply planning.

The deteriorating hydrologic conditions led DWR to reduce the SWP Table A Allocation for 2022 from 15 to five percent of contract amounts on March 18, 2022. This follows a five percent SWP Table A Allocation in 2021. Coming in the third year of drought, this extremely low Table A allocation is insufficient to meet minimum human health and safety needs in the SWP Dependent Area. Accordingly, DWR will exercise a never-before-invoked provision of the water supply contract (Article 18a) that allows SWP water to be allocated on some other basis than Table A to meet minimum demands for domestic supply, fire protection, or sanitation. To that end, in October 2021 Metropolitan submitted a letter to DWR requesting delivery of certain human health and safety supplies to the SWP Dependent Area.

It should be noted that the boundaries of the SWP Dependent Area are not fixed and other Metropolitan supplies (such as previously stored SWP supplies from groundwater banking, carryover, flexible storage in Castaic Lake or Perris Lake, or north-of-Delta transfers) are also delivered through those service connections. The boundaries of the SWP Dependent Area have been reduced in recent years with the new ability to supply the Mills Water Treatment Plant from Diamond Valley Lake (May 2021) and through new water management programs such as the Operational Shift Cost Offset Program (May 2021) and the Reverse Cyclic Storage Program (February 2022).

Although the exact conditions to access human health and safety supplies are not finalized, DWR expects contractors receiving such supplies to mandate substantial reductions in water use consistent with these emergency drought circumstances. Further, DWR will require any water taken in 2022 for human health and safety purposes to be returned within five years, thus creating a water supply debt that effectively trims future Table A allocations and slows any storage recovery once the drought eases. Guidelines established by DWR are based on prior curtailment regulations adopted by the California State Water Resources Control Board (SWRCB) and could be further modified.

The Need for Demand Management in the SWP Dependent Area

Of most importance, the normal water demands of Member Agencies currently lying within the SWP Dependent Area cannot be met in 2022 without a real risk of depleting supplies needed for human health

and safety. Metropolitan must seek the water offered by DWR for human health and safety purposes and must conform to conditions that DWR places on its use.

In November 2021, the Board declared that specified emergency conditions exist within portions of the service area rather than across the entire regional system. The Board's action on that date also stated that, "should drought conditions persist or worsen in the coming months, Metropolitan's Board of Directors will consider declaring a water shortage emergency condition and imposing appropriate regulations, restrictions and penalties pursuant to California Water section 350 *et seq.*, so as to conserve Metropolitan's water supplies for the greatest public benefit with particular regard to domestic use, sanitation, and fire protection." Unfortunately, current hydrologic conditions require this type of action.

In 2014, the Board adopted a revised Water Supply Allocation Plan (WSAP) to be used when a regional shortage exists. The WSAP establishes baseline usage, regional shortage levels, and a surcharge for a member agency's aggregate water use above a predetermined allotment. The WSAP was designed and intended only for use during region-wide water shortages. The WSAP included provisions, based on Senate Bill X7-7 in 2009, to set a floor of minimum per capita usage of 100 gallons per person per day (gpcd) for total water use and 55 gpcd for indoor residential water use. Staff determined that the WSAP, with its regional focus, could not effectively or efficiently alleviate the circumstances of this current emergency.

Rather than modifying or reconstructing the WSAP for this rapidly developing emergency condition, a more expedient manner to preserve existing water supplies in the SWP Dependent Area is to reduce or eliminate non-essential uses in the directly affected areas. These non-essential uses (e.g., water for outdoor landscapes, filling swimming pools or fountains, or washing cars) could be curtailed through either price or non-price mechanisms.

A Framework for the Emergency Water Conservation Program

Based on these principles, and through collaboration with the affected member agencies, staff recommends the Board authorize an Emergency Water Conservation Program that initially focuses on non-price mechanisms to reduce outdoor watering. The proposed Emergency Water Conservation Program includes three main elements to achieve the goal of lowering normal demand and preserving water for human health and safety purposes:

- (1) Each member agency that currently receives SWP supplies¹ at the connections within the SWP Dependent Area must implement and enforce a restriction on outdoor watering of no more than one day per week (and outdoor watering may later be completely banned).
- (2) If a member agency either does not submit an acceptable plan to limit outdoor watering or if it inadequately enforces the plan, a penalty of up to \$2,000 per acre-foot shall be assessed on all supplies delivered to that non-compliant agency at the designated connections. Importantly, for wholesale member agencies, the penalty would apply only to that portion of water delivered to one or more of their non-compliant retail agencies. The penalty would not be applied to the full delivery to the wholesale member agency if only a portion of its retailers were non-compliant.
- (3) An agency **can entirely avoid these outdoor watering restrictions and penalties** if it takes sufficient action to entirely eliminate its use of SWP supplies at the designated connections.

Outdoor watering ordinances. Staff is coordinating with the affected member agencies to define elements of one-day-per-week watering. Metropolitan would not specify, for example, either the day of the week or any even/odd house numbering rotation. Metropolitan will, however, require that member agencies limit watering times to 8 minutes per station (for most irrigation systems) to prevent substitution of water use from newly banned days to permitted days. Hand watering of trees would be exempt from the one-day-per-week restriction.

Each retail water provider receiving supply at the designated connections must submit municipal codes or ordinances adopted by their respective governing bodies which clearly restrict outdoor watering to no more than one day per week. Staff will report progress and performance with these restrictions monthly to the Board. The

¹ SWP supplies are Metropolitan's supply inclusive of SWP Table A, carryover storage, flexible storage, north-of-Delta transfers, and previously stored Table A supplies pumped or exchanged through water management programs along the California Aqueduct.

call for one-day-per week watering would take place immediately upon the Board's authorization of the Emergency Water Conservation Plan (planned for April 26, 2022). In order to avoid a volumetric penalty for water used beginning in June 2022, the retailer must adopt and begin enforcement of the restrictions by May 31, 2022.

Enforcement plans. Equally important to the outdoor watering restrictions on paper is the agency's willingness and ability to enforce meaningful penalties for non-compliance. Staff is also coordinating with the member agencies in this area to develop a list of acceptable enforcement provisions, because enforcement mechanisms may vary widely. For example, one agency might use code enforcement officers to cite and educate customers. Another agency might use advanced metering infrastructure to flag suspected outdoor water use on banned days electronically. Yet another agency might use tiered pricing penalties to assure compliance. **The relevant enforcement principle is that the agency establishes a plan with real consequences to the consumer for inaction with either a one-day-per-week restriction or a ban on all outdoor water use.** Further, an enforcement plan must be auditable with a clear and transparent way to verify enforcement. Similar to the outdoor watering ordinances, enforcement plans must be adopted by the retail agency's governing body by May 31, 2022, to avoid the volumetric penalty beginning Jun. 1, 2022. If the retail agency is not the Metropolitan member agency, then the Metropolitan member agency must coordinate regulations to be enacted by the retail agency in the affected area.

Volumetric penalties. If a retail agency takes supply at the designated connection but does not adopt either an acceptable outdoor watering ordinance or enforcement plan, the volume of water purchased by the member agency at that connection for itself, or on behalf of the retail agency, shall be assessed a \$2,000 per acre-foot penalty. This penalty will be charged to the member agency separate from all other applicable rates and charges for water service, as it is not a charge for service. For wholesale member agencies, the penalty would apply only to that portion of water delivered to one or more of their non-compliant retail agencies. The penalty would not be applied to the full delivery to the wholesale Member Agency if only a portion of its retailers were non-compliant.

The fine of \$2,000 per acre-foot was selected to send a strong economic signal to reduce water use by complying with an outdoor watering ordinance and enforcement plan. Any penalties collected would be proportionately returned to member agencies (once compliant) to help defray enforcement or other costs incurred in conjunction with the proposed Emergency Water Conservation Program.

The outdoor watering ordinances, enforcement plans, and volumetric penalties listed above comprise the framework of the Emergency Water Conservation Plan. At the Special Board Meeting planned for April 26, 2022, the Board will consider whether to authorize the General Manager to finalize the plan's terms. Once final, the member agencies and retail agencies that are not member agencies would adopt ordinances and enforcement plans to avoid penalties to the Member agencies.

Assistance Provided to Member Agencies

Metropolitan will assist the member agencies in improving compliance with the watering restrictions and amplifying the serious message to consumers within the SWP dependent areas. Assistance will take these forms:

- (1) **Member Agency Administered Program (MAAP).** Metropolitan will make available the full allotment of the MAAP funds to the affected Member agencies. Metropolitan will allow affected member agencies to access remaining funds in the MAAP for enforcement activities for the current biennium. For the upcoming biennium, approximately \$4.2 million is proposed in the budget for the affected agencies. These funds would be made immediately available beginning July 1, 2021. In addition, any penalties paid for non-compliance with the Emergency Water Conservation Plan would likewise be made available to agencies for enforcement. A member agency wishing to access these funds must still submit a proposal for approval by Metropolitan.
- (2) **Assistance with public messaging for drought awareness and water conservation.** In Mar. 2022, the Board authorized staff to enter into a three-year contract with a media placement firm. From March – June 2022, up to \$3.5 million is available to develop and purchase advertising. Likewise, up to \$7.4 million is available in the proposed FY 2022-24 biennium budget. Metropolitan staff will coordinate closely with the public affairs staff of the affected member agencies to send an amplified and unified message to consumers about the one-day-per-week watering restrictions. Metropolitan will stand with the

member agencies in communicating these emergency conditions. Staff expects many opportunities to amplify the message also through the earned media of press conferences and news media stories.

Planned Monitoring and Reporting

Staff will report to the Water Planning and Stewardship Committee each month on progress achieved by the Emergency Water Conservation Program. Further, staff will partner with the member agencies to collect and report changes in per-capita water use. Staff will monitor progress and report back to the Board using these types of tools:

- Lists of agencies with compliant outdoor watering restrictions and enforcement plans.
- Change in Metropolitan water deliveries to the SWP Dependent Area.
- Total local supply production within the SWP Dependent Area.
- Water conservation and productions reports based on monthly data submitted to the SWRCB on residential per capita water use.
- Disaggregated data from more than 5,000 flow-monitoring devices installed on single-family homes in Metropolitan's service area (including approximately 1,500 within the SWP Dependent Area) showing changes in outdoor water use behavior.
- Remote-sensing imagery showing change in "greenness" of outdoor landscapes (this is a developing research method).

Through this monthly monitoring and through regular communications with the member agencies, the General Manager would inform the member agencies and the Board in advance of the intent to implement the second phase of the Emergency Water Conservation Plan and ban all outdoor watering.

Continuing Actions to Improve the Plan if the Drought Persists or Compliance Falters

The primary goals of the two-phase Emergency Water Conservation Plan are to (1) preserve Metropolitan's scarce supplies in 2022; (2) minimize the amount of SWP human health and safety water that Metropolitan must access (and pay back); and (3) prepare for a potentially dry 2023. Preserving water supply now allows the potential for a new water year to develop, and the plan could be modified as conditions improve. Alternatively, despite the best efforts of agencies in the SWP Dependent Area to reduce or eliminate non-essential water use, continuing drought conditions may force further action.

Staff is actively exploring with the member agencies alternative approaches to reduce demands if the outdoor watering restrictions within the proposed Emergency Water Conservation Plan prove ineffective, disproportionate, or unworkable. Staff will develop a population-based method designed to share the remaining supply across the agencies using limits on per-capita water use rather than solely on outdoor watering restrictions. The population-based method, or a hybrid approach combining outdoor watering restrictions with a backstop of a population-based limit, may prove to be a more viable tool to reduce water use. If an alternative approach is needed, the General Manager would seek Board approval before implementation.

Other Activities Supporting the SWP Dependent Area

Staff regularly reported to the Board and sought authority and funding to address system and supply shortages affecting the SWP Dependent Area. The Emergency Water Conservation Program is intended only as a short-term, stop-gap policy until lasting relief can be provided. Sample operational, physical, and supply actions to improve the supply constraints include:

- Adjusted distribution system operations to minimize SWP use and draw heavily on the Colorado River and stored supplies (January 2021).
- Increased pumping on the Colorado River Aqueduct to the total capacity of eight pumps (intermittent operation since April 2021).
- Initiated the Operational Shift Cost Offset Program (May 2021) and Reverse Cyclic Program (February 2022), which removed financial barriers to switching from or deferring SWP deliveries.
- Switched the source water feed to the Mills Water Treatment Plant from SWP to Diamond Valley Lake storage (May 2021).
- Rebuilt and started up the Greg Avenue facility to pump ~100 acre-feet per day of Colorado River and stored supplies into the western portion of the distribution system (June 2021).

- Expanded conservation programs (December 2021).
- Authorized agreements with other water agencies to improve management of SWP supplies (San Bernardino Valley MWD, San Diego County Water Authority, December 2021).
- Amended the capital investment plan to start planning and implementing infrastructure projects for the western portion of the distribution system (February 2022).

These actions are accelerating with the development of infrastructure and water supply portfolios through the Extreme Drought Assessment, which includes as its design condition three SWP allocations of five percent.

Policy

Metropolitan Water District Administrative Code Section 6410. Powers and Duties

Metropolitan Water District Administrative Code Section 6412. Delegation of Executive and Administrative Powers

Metropolitan Water District Administrative Code Section 11104: Delegation of Responsibilities

By Minute Item 20984, dated Nov. 1, 1960, the Board adopted Resolution 5838 and approved the execution of the SWP contract with DWR.

By Minute Item 49979, dated Dec. 9, 2014, the Board approved adjustments to the Water Supply Allocation Plan

By Minute Item 50824, dated May 9, 2017, the Board adopted a resolution that declared a “Condition 1 –Water Supply Watch.”

By Minute Item 52378, dated May 10, 2021, the Board adopted the 2020 Urban Water Management Plan and the Water Shortage Contingency Plan

By Minute Item 52481, dated Aug. 17, 2021, the Board adopted a resolution that declared a “Condition 2 –Water Supply Alert.”

By Minute Item 52581, dated Nov. 9, 2021, the Board adopted a resolution which declared specified emergency conditions within the Metropolitan service area.

Fiscal Impact

Upon adopting the Emergency Water Conservation Plan, revenues from water transactions will likely decrease as member agencies reduce water demands. At the Mar. 22, 2022, budget workshop, staff presented a scenario with 100 thousand acre-feet fewer transactions for two years. This scenario—realistic in the magnitude of the needed demand management activity—would reduce revenues by approximately \$100 million each year.



 Brad Coffey
 Manager, Water Resource Management

4/7/2022

 Date



 Adel Hagekhalil
 General Manager

4/8/2022

 Date

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

Apple Valley Ranchos Water Co.
Tony Pena – General Manager
21760 Ottawa Road
P.O. Box 7005
Apple Valley, CA 92308
tpenna@avrwater.com

Barlen Mutual Water
P.O. Box 77
Barstow, CA 92311

Director of Public Services
Town of Apple Valley
14955 Dale Evans Parkway
Apple Valley, CA 92307

California American Water
4701 Beloit Drive
Sacramento, CA 95838-2434
ca.rates@amwater.com

California Department of Corrections
P. O. Box 5001
7018 Blair Road
Calipatria, CA 92233

Calif. Dept. of Forestry
7105 Airway Drive
Yucca Valley, CA 92284

Calif. Dept. Forestry Headquarters
3800 N. Sierra Way
San Bernardino, CA 92405

Daggett Community Service
P. O. Box 308
Daggett, CA 92327
(619) 254-2415

County Water
P.O. Box 5004
Victorville, CA 92393-5001

East Orange County Water
185 N. McPherson Road
Orange, CA 92869-3720
lohlund@eocwd.com
ech20@ocwd.com

East Pasadena Water Co.
3725 Mountain View Ave.
Pasadena, CA 91107

Imperial County Board of Supervisors
Attn: Supervisor Raymond R. Castillo, Chairman
County Admin. Center
940 W. Main St, #209
El Centro, CA 92243-2871

Jurg Heuberger, CEP, Executive Officer
LAFCO
1122 W. State Street, Suite D
El Centro, CA 92243-2840

Juniper Riviera CWD
P. O. Box 386
Apple Valley, CA 92307

Local Agency Formation Commission
215 North D Street – Suite 204
San Bernardino, CA 92415-0490
lafco@lafco.sbcounty.gov

Mariana Ranchos County Water District
9600 Manzanita Street
Apple Valley, CA 92308
MarianaCWD@mrcwd.org

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

Morongo Valley Comm Serv Dist
P. O. Box 46
Morongo Valley, CA 92256

Navajo Mutual Water Company
P. O. Box 392
Apple Valley, CA 92307-392
Gmmwvc@gmail.com

Park Water Company
9750 Washburn Road
Downey, CA 90241

Rancheritos Water Co.
P.O. Box 348
Apple Valley, CA 92307
(619) 247-3730
RMWC1954@gmail.com

San Gabriel County Water Co.
8366 Grand Avenue
Rosemead, CA 91770
Jim@sgcwg.com

San Gabriel Valley Water Co.
11142 Garvey Blvd.
El Monte, CA 91732
ratesdepartment@sgvwater.com

Seeley County Water District
P.O. Box 161
Seeley, CA 92273

Serrano Water Dist. - Villa Park
18021 East Lincoln Street
Villa Park, CA 92667

Sheep Creek Water Company
P. O. Box 291820
Phelan, CA 92329-1820
Attn: Chris Cummings
sheepcreek@verizon.net

Sunny Slope Water Co.
1040 El Campo Dr.
Pasadena, CA 91107-5506
Ken@sunnyslopewatercompany.com
Karen@sunnyslopewatercompany.com

Twentynine Palms Water Dist.
72401 Hatch Rd. (P.O. Box 1735)
Twentynine Palms, CA 92277
(619) 367-7546
RKolisz@29palmswater.org

Victor Valley Water District
14343 Civic Drive
P O box 5001
Victorville, CA 92392

Walnut Valley Water Dist.
271 S. Brea Canyon Road
Walnut, CA 91789

Water Issues Committee
Wrightwood Property Owners Assoc.
P. O. Box 487
Wrightwood, CA 92397

City of Anaheim
City Clerk's Office
200 S. Anaheim Blvd. – Suite 217
Anaheim, CA 92805

City of Arcadia Water Co.
240 W. Huntington Drive
P.O. Box 60021
Arcadia, CA 91066-6021

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

City of Alhambra Utilities Dept.
111 S. First Ave.
Alhambra, CA 91801

City of Brawley Water Co.
400 Main Street
Brawley, CA 92227
TSalcido@Brawley-ca.gov

City of Brea
Water Department
#1 Civic Center Drive
Brea, CA 92621

City of Buena Park
6650 Beach Boulevard
Buena Park, CA 90620

City of Calexico Water Co.
608 Heber Avenue
Calexico, CA 92231
vrodriguez@calexico.gov

City of Covina
534 Barranca Avenue
Covina, CA 91723
CMarcareello@covinaca.gov

City of El Centro Water Co
307 W. Brighton
El Centro, CA 92243

City of El Monte Water Co.
11333 Valley Blvd.
El Monte, CA 91732
imussenden@ci.el-monte.ca.us

City of Fullerton Water
Fullerton Water Department
303 W. Commonwealth Avenue
Fullerton, CA 92631
garh@ci.fullerton.ca.us

City of Garden Grove
13802 Newhope Street
Garden Grove, CA 92643
zackb@ci.garden-grove.ca.us

City of Glendora
116 E. Foothill Blvd.
Glendora, CA 91740

Herber Public Utility District
P. O. BOX H
Heber, CA 92249

City of Hesperia Water Department
9700 Seventh Avenue
Hesperia, CA 92345
jwyman@cityofhesperia.us

City of Imperial - Water Department
420 S. Imperial Avenue
Imperial, CA 92251

City of La Palma
7822 Walker Street
La Palma, CA 90623
Attn: Jeff Moneda, PW Director

City of La Verne Water Department
Jerry Mesa, Utilities Manager
3660 "D" Street
La Verne, CA 91750
jmesa@ci.la-verne.ca.us

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

Monte Vista Water District
10575 Central Avenue
Montclair, CA 91763

City of Monrovia Water Co.
415 S. Ivy Avenue
Monrovia, CA 91016

City of Pomona Water Department
505 S. Garey Avenue
Pomona, CA 91766
Rozaluia_outley@ci.pomona.ca.us

City of San Dimas
245 E. Bonita Avenue
San Dimas, CA 91773
dblack@sandimasca.gov
bmckinney@sandimasca.gov

City of Seal Beach
211 Eight Street
Seal Beach, CA 90740

City of West Covina Water Dept.
825 S. Sunset Avenue
West Covina, CA 91790

Steve Conklin, Acting General Manager
Yorba Linda Water District
1717 E. Miraloma Avenue
Placentia, CA 92870
Sconklin@ylwd.com
RWeston@ylwd.com

City Attorney
City of Barstow
222 East Mountain View Street
Barstow, CA 92311

City of Monterey Park Water Co.
320 W. Newmark Avenue
Monterey Park, CA 91754
rgonzales@montereypark.ca.gov

City of Orange Water Dept.
189 South Water Street
Orange, CA 92866
idefrancesco@cityoforange.org

Interim Water Resources Director
City of Pomona
148 N. Huntington Street
Pomona, CA 91768
chris_diggs@ci.pomona.ca.us

City of Santa Ana Water
20 Civic Center Plaza
Santa Ana, CA 92702
ryhernandez@santa-ana.org

City of Upland Water Dept.
460 N. Euclid Avenue
Upland, CA 91786
BYu@uplandca.gov
JRobles@ci.upland.ca.us
MMadriz@ci.upland.ca.us

City of Westminster
8200 Westminster Boulevard
Westminster, CA 92683
smiller@westminster-ca.gov

City Attorney
City of Arcadia
240 West Huntington Drive
Arcadia, CA 91006
cityattorney@arcadiaca.gov

City Attorney
Oswalt & Associates
Mr. William (Bill) Smerdon
P. O. Box 607
Imperial, CA 92251

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

City Attorney
City of Claremont
P. O. Box 880
Claremont, CA 91711

City Attorney
City of Covina
125 E. College Street
Covina, CA 91723

City Attorney
City of Cypress
5275 Orange Avenue
Cypress, CA 90630

City Attorney
City of Duarte
1600 Huntington Drive
Duarte, CA 91010
jmelching@rutan.com

City Attorney's Office, Jennifer Ibarra
City of El Monte
11333 Valley Blvd.
El Monte, CA 91731-3293
jibarra@ci-el-monteca.us

City Attorney
City of Irwindale
5050 North Irwindale Avenue
Irwindale, CA 91706

City Attorney
City of La Palma
7822 Walker Street
La Palma, CA 90680

City Attorney
City of La Verne
3660 D Street
La Verne, CA 91750

Administrative Services Director
City of Los Alamitos
3191 Katella Avenue
Los Alamitos, CA 90720
WQuintanar@cityoflosalamitos.org
CKoehler@cityoflosalamitos.org

City Attorney
City of Monrovia
415 South Ivy Avenue
Monrovia, CA 91016
csteele@rwglaw.com

City Attorney
City of Montclair
5111 Benito Avenue
Montclair, CA 91763
der@robbinsholdaway.com

City Attorney
City of Monterey Park
2600 W. Olive Ave., Suite 500
Burbank, CA 91505
KBerger@hensleylawgroup.com

City Attorney
City of Orange
300 E. Chapman Avenue
Orange, CA 92666
wwinthers@cityoforange.org

City Attorney
City of Placentia
401 East Chapman Avenue
Placentia, CA 92670

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

City Attorney
City of Pomona
505 S. Garey Avenue
Pomona, CA 91766

City Attorney, Bonifacio Garcia
City of Rosemead
8838 E. Valley Blvd.
Rosemead, CA 91770

City Manager
City of San Dimas
245 East Bonita Avenue
San Dimas, CA 91773
cconstantin@sandimasca.gov

City Attorney
City of San Gabriel
425 S. Mission Drive
San Gabriel, CA 91776

City Attorney
City of Seal Beach
211 8th Street
Seal Beach, CA 90740
csteele@rwqlaw.com

City Attorney
City of Stanton
7800 Katella Avenue
Stanton, CA 90680

City Attorney
City of Temple City
5938 Kaufman
Temple City, CA 91780

City Attorney
City of Yorba Linda
4845 Casa Loma Avenue
Yorba Linda, CA 92886-3364

City Council
City of Calipatria
125 N. Park Avenue
Calipatria, CA 92233-0167

City Clerk
City of Barstow
222 E. Mountain View St., Suite A
Barstow, CA 92311
icousino@barstowca.org

City Clerk
City of Claremont
P. O. Box 880
Claremont, CA 91711
pmalloy@ci.claremont.ca.us
sdesautels@ci.claremont.ca.us

Community Services Director
City of Claremont
1616 Monte Vista Avenue
Claremont, CA 91711

City Clerk
City of Covina
125 East College Street
Covina, CA 91723

City Clerk
City of Cypress
5275 Orange Avenue
Cypress, CA 90630
adm@cypressca.org
pgrant@cypressca.org

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

Management Analyst
City of Duarte
1600 Huntington Drive
Duarte, CA 91010
Vrocha@accessduarte.com

City Clerk
City of El Monte
11333 Valley Blvd.
El Monte, CA 91731-3293

City Clerk
City of Irwindale
5050 North Irwindale Avenue
Irwindale, CA 91706

City Clerk
City of La Palma
7822 Walker Street
La Palma, CA 90680

City Clerk
City of La Verne
3660 D Street
La Verne, CA 91750
Lestrella@ci.la-verne.ca.us

City Clerk
City of Los Alamitos
3191 Katella Avenue
Los Alamitos, CA 90720
WQuintanar@cityoflosalamitos.org

City Clerk
City of Monrovia
415 South Ivy Avenue
Monrovia, CA 91016

City Clerk
City of Montclair
5111 Benito Avenue
Montclair, CA 91763
CityClerk@CityofMontclair.org

City Clerk
City of Orange
300 E. Chapman Avenue
Orange, CA 92666
Cperez@cityoforange.org
ijohnson@cityoforange.org

City Clerk
City of Placentia
401 East Chapman Avenue
Placentia, CA 92670
cmartinez@placentia.org

City of Rosemead
8838 E. Valley Boulevard
Rosemead, CA 91770
EHernandez@CityofRosemead.org
NHaworth@CityofRosemead.org

City Clerk's Department
City of San Gabriel
425 S. Mission Drive
San Gabriel, CA 91776
CityClerk@sgch.org

City Clerk
City of Seal Beach
211 8th Street
Seal Beach, CA 90740
PGallegos@sealbeachca.gov
TKelsey@sealbeachca.gov

City Clerk, Patricia Vazquez
City of Stanton
7800 Katella Avenue
Stanton, CA 90680
PVazquez@ci.stanton.ca.us

GOLDEN STATE WATER COMPANY

REGION 3 - SERVICE LIST

City Manager
City of Temple City
9701 Las Tunas Drive
Temple City, CA 91780

City Clerk
City of Yorba Linda
4845 Casa Loma Avenue
Yorba Linda, CA 92686-3364
mbrown@yorba-linda.org

County Counsel
County of San Bernardino
385 N. Arrowhead Avenue, 2nd Floor
San Bernardino, CA 92415-0140

Chamber President
Niland Chamber of Commerce
P. O. Box 97
Niland, CA 92257

County Clerk
County of Orange
12 Civic Center Plaza
Santa Ana, CA 92702

County Counsel
County of Orange
333 W. Santa Ana Blvd., 4th Floor
Santa Ana, CA 92701

County Clerk
County of San Bernardino
222 West Hospitality Lane
San Bernardino, CA 92415-0022

County of San Bernardino
Water and Sanitation Area
P. O. Box 5004
Victorville, CA 92393-5004

Scott Blaising
Braun Blaising McLaughlin & Smith PC
915 L Street, Suite 1270
Sacramento, CA 95814
blaising@braunlegal.com

Megan Somogyi
Goodin, MacBride, Squeri & Day, LLP
505 Sansome Street, Suite 900
San Francisco, CA 94111
MSomogy@goodinmacbride.com

Naval Facilities Engineering Command
Rea D. Estrella
Southwest Division
1220 Pacific Highway
San Diego, CA 92132
Rea.estrella@navy.mil

Liberty Utilities (California)
9750 Washburn Road
Downey, CA 90241
AdviceLetterService@LibertyUtilities.com