



January 8, 2020

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board

RE: Comment Letter – Proposed Urban Water Conservation Reporting Regulations

Dear Ms. Townsend,

Thank you for the opportunity to comment on the State Water Resource Control Board's proposed urban water conservation reporting guidelines. We greatly appreciate the work of State Water Resources Control Board ('State Board') members and staff to develop and implement the urban water conservation reporting regulations. We believe that high-quality, timely data are critical for managing water in California and especially important given future variability and uncertainty due to climate change and other stressors. We have found the monthly reports to be invaluable because they are timely and comparable, allowing for rapid communication and action by decision makers and the public. The Pacific Institute supports the proposed urban water conservation reporting regulations and offers a few recommendations for improving them.

Governor Brown's 2015 Executive Order (EO B-29-15) prompted agencies, organizations, and communities across California to step up to meet and even exceed water conservation goals. Reporting of monthly water use data was mandated starting July 2014 but became voluntary in March 2016. In July 2015, when reporting was mandatory, 408 water suppliers reported monthly data to the State Water Resources Control Board. By July 2019, however, the number of urban water suppliers reporting data to the state declined by 14 percent. While we applaud those agencies that have continued to report data, the decline in the number of water suppliers reporting basic data to the state is an indication of the need to mandate such reporting.

Monthly urban water conservation reporting provides data critical for developing sound policies that improve water and climate resiliency for California.

The Pacific Institute is a user of water-related datasets. Datasets like the monthly conservation reports help the policy and research community understand trends and make connections to actionable policy. The monthly reports have been especially useful because these data are accessible, timely, and relevant. Indeed, we use the data to regularly update our [Urban Water Use Map](#) and are planning to continue this work. These reports help a variety of audiences, including the media, public, business community, as well as researchers and decision makers, understand and communicate temporal and spatial trends in water use.

We do not find the monthly reports to be in conflict or duplicative with the electronic Annual Reports (eAR). Indeed, we find the monthly reports especially useful because they are released only two months after the data are collected, are easily and publicly accessible, are available in an easy-to-read CSV format, and include a helpful display of trends using analysis performed by State Board staff. While the eAR dataset is more comprehensive, there is a long lag period before the data are available to the public. In addition, these data are only available through a request to the State Board, making it cumbersome to use the data. Moreover, many do not know that these data are available. We find value in both datasets but appreciate the monthly reporting because it is timely and provides easily accessible information in simple categories, allowing for improved monitoring and communication of water use patterns and potentially faster responses to a more variable and uncertain future.

The reporting guidelines have been effectively restructured so that they are practical and beneficial. However, several changes would improve the quality of the data collected.

After the emergency regulations were lifted, the monthly reports continued to retain columns that were no longer relevant. In the proposed regulation, State Board staff have done an excellent job of simplifying the reports. The report is easy to follow and conveys useful information in a concise manner. The addition of the PWSID column is especially helpful and will facilitate using this dataset in combination with other datasets.

While we appreciate the report restructuring that has been done, we offer some recommendations for improving the quality of the data collected. Generally, the accuracy of these data could be improved by instituting several procedures: (1) the input form should be clear; (2) likely errors and missing data should be flagged when the respondent is inputting data; (3) State Board staff should verify information once it is received; and (4) respondents should be asked to correct mistakes. We provide specific recommendations below:

a. Do not prepopulate the % residential column

Under the proposed regulations, we foresee a chance that the percent residential column may be prepopulated by State Board staff using previously reported values. We have found that residential water use, as a fraction of total use, can vary widely from month to month for an individual supplier. For example, for one water supplier, the percent residential value varied month-to-month, from 44% in November 2014 to 67% in December 2014, and year-to-year, from 76% in December 2017 to 72% in December 2018. Thus, prepopulating this value can lead to inaccurate and potentially misleading information. Water suppliers should be required to report percent residential water use each month, and the data form should not be prepopulated to ensure that the data submitted are accurate.

b. Require water suppliers to report monthly CII water use

During the drought, water suppliers were required to report monthly water use for commercial, institutional, and industrial (CII) customers. The proposed regulations have removed this reporting requirement. We urge the State Board to reconsider this. The business community is often left out of water efficiency conversations. Including this information provides a useful data point in better

understanding the ways the CII community can improve water use practices. We work closely with the business community in California and abroad and have seen a real interest from the business community to improve water use practices but only limited data for that sector. Further, these will help to identify where policy and actions should be focused and support implementation of the CII elements of AB 1668/SB 606.

c. Flag unreasonable and empty values

We recommend creating basic rules to flag likely errors for the respondent when inputting data. For example: R-GPCD should fall within a reasonable range, and CII water use should be less than total potable water production. In addition, State Board staff should scan for missing data and likely errors (such as values that are extreme outliers) and ask for corrections.

d. Distinguish between different 'blank' inputs

We recommend instituting the following response options for all questions: "NA" (not applicable to this water system), "unknown" (this water system does not collect that information), "0" (the answer is known, and it is zero), or "No" (in response to a yes or no question). These responses are valuable information and should be distinct from blank cells, which should exclusively represent a failure to fully fill out the form that requires correction.

Ensuring that the data are released in a consistent, timely, and well-documented manner will increase the effectiveness of the data.

a. Frequency of Release

As a frequent user of the monthly reporting data, we are eager to see the data as soon as possible. However, we understand the time needed to process and clean up the submitted reports before it can be made available. To maintain a consistent and reliable pattern of release, we suggest that the State Board impose a timeline for the release of the data. A lag period of one to two months as previously established is acceptable as long as it is consistent. A second important aspect of releasing the data is the format in which it is released. The CSV format is useful, and we recommend that this format be retained.

b. Improve Data Documentation

The utility of the information is greatly hampered by a lack of adequate documentation on the data. In alignment with the California Open Data Portal standards, the monthly report should be accompanied by a data dictionary. As an example, the California Integrated Water Quality System (CIWQS) provides a helpful [data dictionary](#) with their datasets. The data dictionary should provide clear explanations and formulas for users of the data on how back-end calculations are being made by State Board staff.

We are pleased to see this reporting become permanent and look forward to the many ways that this information can be used to help the state in making future water resiliency decisions. Please do not hesitate to reach out with any questions, and we look forward to further discussion.

Best Regards,

/s/ Sonali Abraham

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