



Frequently Asked Questions

Water Loss - Frequently Asked Questions

When will suppliers be required to meet water loss standards?

Suppliers will be required to meet water loss standards by 2028 (or by 2031 in some cases), using water audit data submitted for 2025, 2026, or 2027. Ongoing compliance will be on a three-year average basis.

Are standards calculated on a system level or a supplier level?

Water loss standards are calculated on a system level.

How can suppliers update the default values in the economic model?

Suppliers must submit default parameter adjustment requests to DDW-WaterLossControl@waterboards.ca.gov. The default parameters that can be changed are: rate of rise of leakage, infrastructure condition factor (ICF), annual background leakage, annual reported leakage, annual unreported leakage, average leak detection survey frequency, unit average cost of leak detection, leak detection efficiency, average unit leak repair costs, marginal avoided cost of water, average annual rise in price of water.

How can suppliers remove outlier values from their average real loss?

Suppliers must submit outlier removal requests to DDW-WaterLossControl@waterboards.ca.gov.

Do disadvantaged communities have to meet the water loss standard by 2028?

Disadvantaged communities that have a benefit-to-cost ratio of less than 2 and a water loss standard that is lower than their baseline average real loss by 25% or more will first be assessed for compliance in 2031, rather than 2028.

What is the baseline period? Can baseline data be changed?

The baseline period is 2017-2020. Real loss and apparent losses used to calculate the standard are the average real losses and apparent losses in the baseline period. Water boards staff can initiate an adjustment process for any system that has significant changes in data compared to the baseline if at least 3 compliance assessments have passed. Suppliers can request an adjustment to the baseline period data if significant data improvements have been made.

Are there any variances or adjustments given for special circumstances?

Variances may be granted in the form of a compliance extension for adverse conditions outside of the utility's control or in the form of an increased safe harbor for

suppliers that show that the baseline period would not be cost-effective long-term. Adjustment requests may be submitted at any time and will be considered on the merits of the proposed change.

What happens if a system consolidates?

Any supplier that has completed a consolidation will have a period of 5 years before being given new standards for any systems involved in the consolidation. The supplier must continue to submit annual water loss audits, incorporating the consolidated system into its own audit no more than one year after consolidation. For each year the supplier has no standard, the supplier must do a leak survey at least as frequently as the previous period and submit documentation of this requirement to the Board within 6 months of the end of each year. New standards will be assessed starting one full compliance period after the new standard is assigned.

Are there any alternative compliance pathways?

A compliance pathway for low-loss suppliers, also known as the off-ramp, is available to suppliers whose average baseline real loss is 16 GPCD or less and meet other criteria specified in the regulation. The following are benefits of meeting the off-ramp criteria.

- a. No response to the questionnaires is required for these suppliers.
- b. Annual inventory of breaks, repairs, and estimated water losses is not required.
- c. Supplier would not have to maintain a real loss standard below 16 gallons per connection per day or 1,184 gallons per mile.

Will suppliers be required to meet an apparent loss standard?

Suppliers must either meet their apparent loss standard (equivalent to their baseline period (2017-2020) apparent losses) or submit an inventory of all apparent losses. Meeting the apparent loss standard is not required as long as an inventory of apparent losses is submitted.

What other submissions are required by the water loss regulation?

1. Questionnaires on data quality, pressure management, and asset management. The **data quality questionnaire** is a one-time questionnaire due by December 31, 2023. The **pressure management questionnaire** is a one-time questionnaire due by December 31, 2023, with an updated response due by July 1, 2026. The **asset management questionnaire** is a one-time questionnaire due by July 1, 2024, with an updated response due by July 1, 2027.
2. **Leak Reporting Registry** – a registry of breaks, repairs, and estimated water losses is due starting January 1, 2029, every three years.

Do suppliers submit questionnaires for each system individually or cumulatively?

Suppliers must submit questionnaires for each system individually.