



Water Shortage Contingency Plan

UPDATED JANUARY 2022

WESTERN MUNICIPAL WATER DISTRICT





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Prepared by Water Systems Consulting, Inc.



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ACRONYMS & ABBREVIATIONS

°F	Degrees Fahrenheit
AF	Acre Foot
AFY	Acre Feet per Year
AWWA	American Water Works Association
BMP	Best Management Practice
CALWARN	California Water/Wastewater Agency Response Network
CAT	Climate Action Team
CCF	Hundred Cubic Feet
CCR	California Code of Regulations
CFS	Cubic Feet per Second
CII	Commercial, Industrial, and Institutional
CIMIS	California Irrigation Management Irrigation System
CUWCC	California Urban Water Conservation Council
DCR	DWR SWP Delivery Capacity Report
DDW	SWRCB Division of Drinking Water
DFW	California Department of Fish and Wildlife
DMM	Demand Management Measure
DWR	California Department of Water Resources
EPA	United States Environmental Protection Agency
ET	Evapotranspiration
ET_o	Reference Evapotranspiration
GIS	Geographic Information System
GPCD	Gallons per Capita per Day
GPM	Gallons per Minute
LAFCO	Local Agency Formation Commission
MCL	Maximum Contaminant Level
MG	Million Gallons
MGD	Million Gallons per Day
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System

RWQCB	Regional Water Quality Control Board
SBX7-7	Senate Bill 7 of Special Extended Session 7
SWRCB	State Water Resources Control Board
UWMP	Urban Water Management Plan
UWMP Act	Urban Water Management Planning Act
WSCP	Water Shortage Contingency Plan
WFF	Water Filtration Facility
WTP	Water Treatment Plant
WWTP	Wastewater Treatment Plant

Water Shortage Contingency Plan

The Water Shortage Contingency Plan (WSCP) is a strategic plan that Western Municipal Water District (Western) uses to prepare for and respond to foreseeable and unforeseeable water shortages. A water shortage occurs when available water supply is insufficient to meet the normally expected customer water use at a given point in time. A shortage may occur due to a number of reasons, such as water supply quality changes, climate change, drought, regional power outage, and catastrophic events (e.g., earthquake).

Additionally, the State may declare a statewide drought emergency and mandate that water suppliers reduce demands, as occurred in 2014. The WSCP serves as the operating manual that Western will use to address catastrophic service disruptions through proactive, rather than reactive, mitigation of water shortages. The Western WSCP provides a process for an annual water supply and demand assessment and structured steps designed to respond to actual conditions. This level of detailed planning and preparation provide accountability and predictability and will help Western maintain reliable supplies and reduce the impacts of any supply shortages and/or interruptions.

This WSCP was originally prepared in conjunction with Western's 2020 Urban Water Management Plan (UWMP) and adopted in June 2021. This document is compliant with the California Water Code (CWC) Section 10632 and incorporates guidance from the State of California Department of Water Resources (DWR) UWMP Guidebook 2020 (California Department of Water Resources, 2021).

IN THIS SECTION

- Overview of the WSCP
- Western Wholesale WSCP
- Western Retail WSCP

The WSCP is a standalone document and can be modified as needed by Western or as required to comply with future changes to the CWC.

The WSCP was updated in January 2022 to modify the retail water shortage levels in Section 1.3.3 and the retail shortage response actions in Section 1.3.4 to align with modifications to Western’s retail water rate structure that took effect on July 1, 2021.

1.1 Overview of the WSCP

Western serves water to both wholesale and retail customers and this WSCP addresses Western’s response to shortages in both its wholesale and retail systems. Some elements of the WSCP do not apply to the wholesale system and are noted below. The WSCP describes the following:

Water Supply Reliability Analysis

Summarizes Western’s water supply analysis and reliability and identifies any key issues that may trigger a shortage condition.

Annual Water Supply and Demand Assessment Procedures

Describes the key data inputs, evaluation criteria, and methodology for assessing the system’s reliability for the coming year and the steps to formally declare any water shortage levels and response actions.

Shortage Stages

Establishes water shortage levels to clearly identify and prepare for shortages.

Shortage Response Actions

Describes the response actions that may be implemented or considered for each stage to reduce gaps between supply and demand.

Communication Protocols

Describes communication protocols under each stage to ensure customers, the public, and government agencies are informed of shortage conditions and requirements.

Compliance and Enforcement

Defines compliance and enforcement actions available to administer demand reductions.

Legal Authority

Lists the legal documents that grant Western the authority to declare a water shortage and implement and enforce response actions.

Financial Consequences of WSCP Implementation

Describes the anticipated financial impact of implementing water shortage stages and identifies mitigation strategies to offset financial burdens.

Monitoring and Reporting

Summarizes the monitoring and reporting techniques to evaluate the effectiveness of shortage response actions and overall WSCP implementation. Results are used to determine if additional shortage response actions should be activated or if efforts are successful and response actions should be reduced.

WSCP Refinement Procedures

Describes the factors that may trigger updates to the WSCP and outlines how to complete an update.

Plan Adoption, Submittal, and Availability

Describes the process for the WSCP adoption, submittal, and availability after each revision.

1.2 Western Wholesale Water Shortage Contingency Plan

This section of the WSCP describes how Western will respond to a wholesale water shortage.

As a member agency of Metropolitan Water District (Metropolitan), Western provides wholesale imported water to various retail agencies in the region. Western has also secured local groundwater supplies to supplement imported supplies, which provides additional reliability and flexibility in the event of a water shortage.

Not all retail agencies within Western's service area purchase wholesale water from Western; as such, the Wholesale WSCP only applies to Western's wholesale customers, which currently include:

- Box Springs Mutual Water Company
- City of Corona
- City of Norco
- Eagle Valley Mutual Water Company
- Elsinore Valley Municipal Water District
- Temescal Valley Water District
- Rancho California Water District
- Western Retail

Additional information on Western's wholesale customers can be found in Western's 2020 UWMP. Western's wholesale WSCP will apply to any future wholesale customers.

1.2.1 Background

Metropolitan Reliability Planning and Water Supply Allocation Plan

The majority of Western's wholesale supplies are imported via Metropolitan and are subject to availability of Metropolitan supplies. Metropolitan, in coordination with its member agencies, has conducted extensive reliability planning, including the 1996 Integrated Water Resources Plan (IRP) and its three updates in 2004, 2010, and 2015; the 2020 IRP currently in development; the Water Surplus and Drought Management (WSDM) Plan; and the Water Supply Allocation Plan (WSAP).

- The IRP is Metropolitan's evolving long-term plan to secure adequate water supplies for Southern California.
- The WSDM Plan provides policy guidance for managing regional water supplies during surplus and shortage conditions. Similar in concept to the WSCP, the WSDM Plan provides an overall vision for operational supply management and characterizes a flexible sequence of actions to minimize the probability of severe shortages and reduce the likelihood of extreme shortages.
- The WSAP is Metropolitan's policy and formula for equitably allocating available water supplies to member agencies during extreme water shortages when Metropolitan determines it is unable to meet all its demands. Metropolitan's WSAP identifies 10 levels of shortage designed to reduce demands by up to 50%. The WSAP does not prescribe demand reduction or limit the available supply but incentivizes reductions through higher fees for use over the allocation amount.

Additional reliability planning efforts by Metropolitan include its Emergency Storage Objective and its Seismic Risk Assessment and Mitigation Plan. More information on all planning efforts listed above can be found in Metropolitan's 2020 UWMP and WSCP.

Metropolitan's WSCP acknowledges that WSAP allocation is a costly shortage response action that places acute burdens upon member agencies and the public. Other shortage response actions are generally preferred to the extent practicable. Metropolitan's overall strategy considers WSAP allocations to be a fallback option to address any remaining shortages when supply augmentation actions and other demand management measures are insufficient to meet demand reduction objectives. Metropolitan's WSAP is included as Attachment 1.

Western has aligned its water shortage policies with Metropolitan's with respect to imported water supplies.

Western Drought Allocation Plan

Western has adopted a Drought Allocation Plan (DAP) that passes through Metropolitan's WSAP actions for imported water shortages to Western wholesale customers. The DAP was prepared by Western in conjunction with its wholesale customers and mirrors the 10 stages of Metropolitan's WSAP. The DAP establishes a means to allocate limited imported water supplies among Western's imported water agencies if Metropolitan implements various stages of its WSAP. Initially developed in 2008, the DAP was updated in 2015 to reflect changes from Metropolitan and the potential impacts of future droughts. The allocation methodology in the DAP was updated for consistency with Metropolitan's WSAP and agreed upon by Western's wholesale customers. A copy of Western's DAP is included as Attachment 2.

The DAP establishes water allocations based on several variables including base period demand, conservation, growth, regional shortage, availability of local supplies, retail water agency dependence on imported supplies, and conservation demand hardening. The allocation method was designed to be equitable on the wholesale level, while helping to minimize hardships experienced by retail agencies and the customers they serve throughout the region.

As with Metropolitan's WSAP, the DAP does not prescribe how Western's wholesale customers reduce demands during shortage, rather the DAP incentivizes conservation through fees for excessive use. Metropolitan charges penalties for use above an allocation established by implementing one of the 10 stages of its WSAP. At the end of the 12-month allocation year, any allocation surcharges or penalties incurred through excessive use of Metropolitan supplies will be passed along to Western's wholesale customers, prorated to reflect each agency's contribution towards penalty and fee accrual.

Metropolitan's WSAP was incorporated into its WSCP but was not modified as part of Metropolitan's WSCP development. Similarly, Western's DAP is incorporated into this Wholesale WSCP, but has not been changed since it was last updated and adopted in 2015. A copy of Metropolitan's WSAP is included as Attachment 1.

1.2.2 Wholesale Water Supply Reliability Analysis

Understanding water supply reliability, factors that could contribute to water supply constraints, availability of alternative supplies, and what effect these have on meeting customer demands provides Western with a solid basis on which to develop appropriate and feasible response actions in the event of a water shortage. In the 2020 UWMP, Western conducted a Water Reliability Assessment to compare the total water supply sources available to long-term projected water use over the next 25 years, in five-year increments, for a normal water year, a single dry water year, and a drought lasting five consecutive water years. Western also conducted a Drought Risk Assessment to evaluate a drought period that lasts five consecutive water years starting from the year following when the assessment is conducted.

The primary constraint on the availability of water supplies has been in extreme drought conditions. As described in Metropolitan's 2020 UWMP, Metropolitan has made substantial investments to increase imported water supply reliability during periods of extended drought. As a result, Metropolitan's 2020 UWMP projects the ability to meet all imported water demands under normal, single dry year, and multiple dry year conditions, with excess supplies.

Through implementation of the Arlington Groundwater Sustainability Plan (GSP), Western expects its local wholesale supply from the Riverside-Arlington groundwater basin water to be stable and does not anticipate any reduction to supplies in dry years.

An analysis of both assessments determined that Western is reliable and anticipates that sufficient local and imported supplies will be available to meet demands, even in dry years, based on Metropolitan's 2020 UWMP.

1.2.3 Wholesale Annual Water Supply and Demand Assessment

As an urban water supplier, Western must prepare and submit an Annual Water Supply and Demand Assessment for its wholesale system (Wholesale Annual Assessment). The Wholesale Annual Assessment is an evaluation of the near-term outlook for supplies and demands to determine whether the potential for a supply shortage exists and whether there is a need to trigger a WSCP shortage stage and response actions in the current calendar year to maintain supply reliability. This process will take place at the same time each year based on known circumstances and information available to Western at the time of analysis and can be updated or revised at any time if circumstances change. Starting in 2022, the Wholesale Annual Assessment will be due by July 1 of every year, as indicated by CWC Section 10632.1.

As a member agency of Metropolitan, Western's protocols for evaluating water supply and demands and implementing shortage restrictions are integrated with Metropolitan's.

Western will establish and convene a WSCP Team to conduct the Wholesale Annual Assessment each year. The WSCP Team may include the following Western staff:

- Director of Water Resources
- Deputy Director of Water Resources
- Director of Finance
- Director of Strategic Communications
- Water Resources Specialist
- Operations Manager

Western’s Wholesale Annual Assessment procedure, including key data inputs, evaluation criteria and responsible staff is summarized in Table 1. To inform the Annual Assessment, Western will continue to coordinate with its wholesale customers to gain valuable input on the region’s supply and demand needs.

Table 1. Wholesale Annual Assessment Timeline

TIMING	ASSESSMENT ACTIVITIES	PROCEDURE, KEY DATA INPUTS, EVALUATION CRITERIA AND OTHER CONSIDERATIONS	WESTERN STAFF RESPONSIBLE
MARCH	Estimate unconstrained demands for coming year	Each year in July, Metropolitan requests “Member Agency Demand Estimate Surveys” from each of their member agencies as part of their annual budgeting process. Western wholesale customers submit a 5-year demand estimate, subtotaled by imported water source (potable or non-potable) and by delivery point (for the following 12-months only). Western will use the estimates provided the previous July. For other Western wholesale supplies, Western coordinates with wholesale customers each year at budget time (March) to establish demands for the following year.	Water Resources Specialist Director of Water Resources
MARCH	Estimate available supplies for the year, considering the following year will be dry	Western anticipates that sufficient imported supplies will be available to meet demands, even in dry years, based on Metropolitan’s 2020 UWMP. If Metropolitan has declared a WSAP stage (typically done in spring of a given year if needed), water use above the WSAP allocation will be charged a penalty rate. The Arlington Basin Groundwater Sustainability Plan (GSP) framework will be used to estimate available supplies from the Arlington Desalter.	Director of Water Resources
MARCH	Consider potential infrastructure constraints that may impact supply delivery	Identify any known Metropolitan or Western infrastructure issues that may pertain to near-term water supply reliability, including repairs, construction, and environmental mitigation measures that may temporarily constrain capabilities, as well as any new projects that may add to system capacity. Identify any facilities out of service due to water quality problems, equipment failure, etc. that may impact normal water deliveries.	Operations Manager
APRIL	Convene WSCP Team to conduct Wholesale Annual Assessment	Compare supplies and demands and discuss any infrastructure constraints that may impact supply delivery. If the potential for a shortage exists or if Metropolitan has enacted a WSAP stage, determine which Western shortage response stage and actions are recommended to reduce/eliminate the shortage or to pass through the Metropolitan WSAP.	WSCP Team

TIMING	ASSESSMENT ACTIVITIES	PROCEDURE, KEY DATA INPUTS, EVALUATION CRITERIA AND OTHER CONSIDERATIONS	WESTERN STAFF RESPONSIBLE
MAY	Engineering, Operations and Water Resources (EOWR) Committee Update	<p>If a shortage stage and response actions are recommended by the WSCP Team, or if Metropolitan has enacted a WSAP stage, provide an update to the EOWR Committee with the findings of the Wholesale Annual Assessment and planned actions.</p> <p>Western's DAP gives the General Manager the authority to implement the DAP in response to Metropolitan implementing its WSAP without further Board action.</p>	Director of Water Resources
JUNE	Western Board of Directors Update	<p>If a shortage stage and response actions are recommended by the WSCP Team, or if Metropolitan has enacted a WSAP stage, provide an update to the Board of Directors with the findings of the Wholesale Annual Assessment and planned actions.</p> <p>Western's DAP gives the General Manager the authority to implement the DAP in response to Metropolitan implementing its WSAP without further Board action.</p>	Director of Water Resources
ON-GOING	Implement WSCP actions, if needed	Relevant members of Western staff will implement shortage response actions if needed.	WSCP Team
PRIOR TO JULY 1	Submit Wholesale Annual Assessment	Send Final Wholesale Annual Assessment to DWR.	Water Resources Specialist

1.2.4 Wholesale Water Shortage Levels and Response Actions

With the exception of a catastrophic failure of the Mills Gravity Line or other infrastructure failure of similar magnitude, Western does not foresee implementing water shortage levels except under Metropolitan’s direction and according to Metropolitan’s WSAP or as required by a state mandate. If a potential water supply shortage is identified in the Wholesale Annual Assessment, this section provides information on the wholesale water shortage levels and response actions that Western may implement. It is important to note that Western’s system is complex and the ultimate actions taken by Western will depend on the unique issues of each particular condition and the opportunities available during a particular shortage condition.

Western has aligned its Wholesale WSCP shortage levels with the six standard water shortage levels outlined in the Water Code. Shortage levels indicate the gap in supply compared to normal year availability. The six standard water shortage levels correspond to progressively increasing estimated shortage conditions (up to 10-, 20-, 30-, 40-, 50-percent, and greater than 50-percent shortage compared to the normal reliability condition) and align with the response actions that Western would implement to meet the severity of the impending shortages.

Western will evaluate the water shortage conditions on a case-by-case basis and determine which response actions are appropriate to maintain water supply reliability or mitigate potential impacts. In collaboration with its wholesale customers, Western’s response to potential shortages may include increased public outreach throughout the region, exploration of additional supply sources, changes to typical operations, and promoting voluntary actions to reduce demands. If Metropolitan implements its WSAP, Western will implement its DAP to align with Metropolitan. Western’s six water Shortage Levels and corresponding response actions that could be implemented by Western are summarized in Table 2. The following subsections describe Western’s potential response actions in more detail.

Western may also implement additional actions not listed in Table 2. Western may implement a combination of the actions specified below, as appropriate, but not necessarily all six actions for each level. Selected actions will depend on the nature of water shortage conditions at a given time.

Table 2. Wholesale Water Shortage Levels and Potential Response Actions

WHOLESALE WATER SHORTAGE LEVELS ¹	ONGOING WATER USE EFFICIENCY	PUBLIC OUTREACH	SUPPLY AUGMENTATION	OPERATIONAL CHANGES	VOLUNTARY DEMAND REDUCTIONS	IMPLEMENT DROUGHT ALLOCATION PLAN ²
Normal Conditions	✓	✓				
Level 1 (Up to 10%)	✓	✓	✓	✓	✓	✓
Level 2 (Up to 20%)	✓	✓	✓	✓	✓	✓
Level 3 (Up to 30%)	✓	✓	✓	✓	✓	✓
Level 4 (Up to 40%)	✓	✓	✓	✓	✓	✓
Level 5 (Up to 50%)	✓	✓	✓	✓	✓	✓
Level 6 (Above 50%)	✓	✓	✓	✓	✓	✓

¹Percentages represent supply shortage compared to normal conditions.

²Western DAP is only triggered in response to Metropolitan WSAP allocations

Ongoing Water Use Efficiency

Western has been a leader in water use efficiency for many years and actively collaborates with local and regional agencies and the communities it serves to implement innovative programs and drive change. As described in Western's 2020 UWMP, Western implements a variety of wholesale demand management measures (DMMs) on a routine basis intended to promote water use efficiency and partner with its wholesale customers to support sustainable management of regional water supplies.

Communication Plan

During a water shortage condition, including short term supply constraints caused by infrastructure impacts, Western collaborates with its wholesale customers to provide enhanced and coordinated public outreach to communicate current conditions, potential impacts to water service and actions that are being taken by Western and its wholesale customers, and actions the public is being asked to take to help reduce water use during the shortage.

Supply Augmentation

In the event of a shortage in normally available supplies, Western may be able to augment supplies through other local groundwater sources and storage programs, if available at the time of the shortage. Such augmentation actions would be short-term and do not overlap with the normal supplies.

Operational Changes

During shortage conditions, operations may be affected by supply augmentation or demand reduction responses. Western will consider its operational procedures at the time of a shortage to identify changes that can be implemented to address water shortage on a short-term basis. In addition, Western and its neighboring agencies have mutual aid agreements and assist each other, if possible, in emergency situations.

Voluntary Demand Reductions

If Metropolitan implements a WSAP allocation, Western will implement its DAP to align. The WSAP and DAP does not require Western's wholesale customers reduce demands during shortage, rather they incentivize demand reduction through fees for excessive use. Metropolitan charges penalties for use above an allocation established by implementing one of the 10 stages of its WSAP and Western passes any penalties charged through to the respective wholesale customers that contributed to accruing the penalties. Demand reductions are voluntary and supplies beyond the allocation can still be purchased at higher penalty rates.

Additional Mandatory Restrictions

Western does not impose mandatory restrictions on its wholesale customers.

Shortage Response Action Effectiveness

Western is committed to working with its wholesale customers to mitigate the impacts of potential supply shortages. Western expects to address any supply shortages through a combination of public outreach, supply augmentation, operational changes, voluntary demand reductions, and implementation of the DAP. The range of potential supply shortage reductions that could be achieved from each response action is summarized in Table 3.

Table 3. Potential Supply Shortage Reduction for Response Actions

RESPONSE ACTION	POTENTIAL SUPPLY SHORTAGE REDUCTION	DESCRIPTION
Ongoing Water Use Efficiency	N/A	Western supports the water use efficiency programs of its wholesale customers but does not directly track resulting water savings from wholesale customers.
Public Outreach	Supports effectiveness of other actions	Anticipated shortages will involve an appropriately sized outreach campaign to address the targeted demand reduction, which depends on the combined effectiveness of other shortage response actions.
Supply Augmentation	0-100%	Supply augmentation actions consisting of stored water and as-needed flexible supplies are expected to address between 0 to 100 percent of anticipated shortages for any shortage level, depending on availability of those supplies; in lesser WSCP shortage levels, it is more likely that shortages can be completely addressed through supply augmentation.
Voluntary Demand Reductions	0-100 %	Efficacy of demand reduction efforts is difficult to estimate or predict and water savings are a function of the extent to which public information campaigns reach water users and the degree of consumer response to those messages, as well as the response of Western wholesale customers and their ability to utilize other supplies. In lesser WSCP shortage levels (i.e. 10% or Stage 1), it is more likely that shortages can be completely addressed through demand reduction. For higher shortage levels, demand reduction would likely need to be combined with other response actions to address the entire shortage.
Implement Drought Allocation Plan	0-50%	Metropolitan’s WSAP is designed to reduce demands by up to approximately 50 percent of the WSAP’s calculated base demand.

1.2.5 Communication Protocols

Western routinely communicates with local water agencies through quarterly general manager meetings. General managers of all the local water agencies meet and discuss regional and agency specific issues, which may include impacts or changes to wholesale supplies and demands.

In the event of water supply shortage, Western will use this forum for ongoing communication about supply shortages and response actions. The region’s general managers can also utilize these meetings to help coordinate consistent regional messaging in times of drought.

1.2.6 Legal Authorities

Western obtains legal authority to implement its DAP through Ordinance 385, which was approved and adopted on May 20, 2015, by Western’s Board after a public hearing. A copy of Ordinance 385 is included as Attachment 3.

Western shall coordinate with any city or county within which it provides water supply services for the possible proclamation of a local emergency, as defined in Section 8558 of the Government Code.

1.2.7 Financial Consequences of WSCP

As mentioned above, in times of extreme shortage, Metropolitan may elect to implement its WSAP and Western will implement its DAP in response. The WSAP reduces allocations to Metropolitan's member agencies, including Western. If Western's wholesale agencies consume more water than their allocation, Metropolitan charges Western penalties based on the percentage of use over the allocation amount. Western will pass along any penalties or surcharges incurred to Western's wholesale customers, prorated to reflect each agency's contribution towards penalty and fee accrual.

In the event of a wholesale water shortage, Western anticipates that revenues will decrease as wholesale customers shift to using other supplies, whether in response to short term outages or the WSAP/DAP penalty pricing, if implemented.

1.3 Western Retail Water Shortage Contingency Plan

Western Retail refers to customers that directly purchase and use water from Western, such as single-family residences or commercial businesses. Western provides water to nearly 25,000 connections within the retail service area, including the Riverside Retail Service Area, Murrieta Retail Service Area, and Rainbow Retail Service Area. These three service areas are collectively referred to as Western Retail and cover a total of 104 square miles and serve water to an estimated population of nearly 100,000.

The Riverside Service Area includes a portion of the City of Riverside and unincorporated areas of Riverside County, including the communities of El Sobrante, Eagle Valley, Temescal Creek, Woodcrest, Lake Matthews and March Air Reserve Base. In 2005, Western took ownership of the Murrieta County Water District as a separate retail service area, now called the Murrieta Service Area. The entire area lies within the city of Murrieta. Western also serves a very small area, called the Rainbow Service Area, in an area just south of the City of Temecula in the unincorporated portion of Riverside County.

Western Retail currently obtains approximately 60% of its supply from Metropolitan and 40% of its supply from local groundwater sources. Note that Western treats its retail system as a wholesale customer as it relates to imported water supplies and demands.

1.3.1 Retail Water Supply Reliability Analysis

Understanding water supply reliability, factors that could contribute to water supply constraints, availability of alternative supply sources, and the effect these have on Western's ability to meet customer demands provide Western with a solid understanding used to develop appropriate and feasible response actions in the event of a water shortage. In the 2020 UWMP, Western conducted a Water Reliability Assessment to compare the total water supply sources available to long-term projected water use over the next 25 years, in five-year increments, for a normal water year, a single dry water year, and a drought lasting five consecutive water years. Western also conducted a Drought Risk Assessment to evaluate a drought period that lasts five consecutive water years starting in 2021. An analysis of both assessments determined that Western is reliable and anticipates meeting retail demands through local and imported water sources.

As described in Section 1.2.2, Western Wholesale expects to have sufficient supplies available to meet the demands of Western Retail and its other wholesale customers, even in dry years, based on Metropolitan's 2020 UWMP.

Western Retail also obtains groundwater supplies from several local groundwater basins, including groundwater from the Chino Basin that is treated and distributed by the Chino Desalter Authority (CDA), of which Western is a member. Each of the groundwater sources are closely managed by Watermasters, Groundwater Sustainability Agencies or Groundwater Sustainability Councils. Western plays a key role in the management of the groundwater basins it relies on to meet retail demands and participates in ongoing water conservation measures and regional recharge projects to enhance and protect the reliability of local groundwater.

Western Retail's recycled water supply is not expected to be affected by climatic factors because source wastewater flows coming from indoor use are generally not impacted by temperature and precipitation. However, recycled water supply availability may decline over time as a result of increased indoor conservation measures and efficient upgrades to plumbing and fixtures. Western also obtains supplemental non-potable

water from imported and local sources. It is anticipated that non-potable water will be available as needed, based on effective basin and imported water management.

Western Retail is reliable and anticipates that sufficient local and imported supplies will be available to meet demands, even in dry years.

1.3.2 Retail Annual Water Supply and Demand Assessment

As an urban water supplier, Western must prepare and submit an Annual Water Supply and Demand Assessment for its retail system (Retail Annual Assessment). The Retail Annual Assessment is an evaluation of the near-term outlook for supplies and demands to determine whether the potential for a supply shortage exists and whether there is a need to trigger a WSCP shortage level and response actions in the current calendar year to maintain supply reliability. Starting in 2022, the Retail Annual Assessment will be due by July 1 of every year, as indicated by CWC Section 10632.1. Western's Retail Annual Assessment procedure, including key data inputs, evaluation criteria and responsible staff is summarized in Table 4.

Western will establish and convene a WSCP Team to conduct the Retail Annual Assessment each year. The WSCP Team may include the following Western staff:

- Director of Water Resources
- Deputy Director of Water Resources
- Director of Finance
- Director of Strategic Communications
- Water Resources Specialist
- Operations Manager

Table 4. Retail Annual Assessment Procedure

TIMING	ASSESSMENT ACTIVITIES	PROCEDURE, KEY DATA INPUTS, EVALUATION CRITERIA AND OTHER CONSIDERATIONS	WESTERN STAFF RESPONSIBLE
MARCH	Estimate unconstrained demands for coming year	Western has several potential approaches to estimate demand for the coming year, including a demand climate model that uses a time series regression analysis, estimates developed by the Finance Department based on historical use, and a California Data Collaborative (CaDC) tool. Western tracks demand estimates from multiple approaches compared to actual demand to refine its estimates over time.	Water Resources Specialist Finance Manager
MARCH	Estimate available supplies for the year, considering the following year will be dry	Western anticipates that sufficient imported supplies will be available to meet demands, even in dry years, based on Metropolitan’s 2020 UWMP. If Metropolitan declares a WSAP stage (typically done in spring of a given year if needed), normal quantities of water will still be available, but will be charged at penalty rate above the allocation. Western’s local supplies are from groundwater basins that are sustainably managed to provide long term supply reliability and are not anticipated to be impacted in dry years. In the unlikely event that local supplies are reduced, Western will coordinate with the groundwater management groups in the respective basins and the CDA to identify any supply reductions. Western plays an active role in these groups to help ensure long term water supply reliability for Western Retail customers.	Director of Water Resources
MARCH	Consider potential infrastructure constraints that may impact supply delivery	Identify any known Metropolitan or Western infrastructure issues that may pertain to near-term water supply reliability, including repairs, construction, and environmental mitigation measures that may temporarily constrain capabilities, as well as any new projects that may add to system capacity. Identify any facilities out of service due to water quality problems, equipment failure, etc. that may impact normal water deliveries.	Operations Manager
APRIL	Convene WSCP Team to conduct Retail Annual Assessment	Compare supplies and demands and discuss any infrastructure constraints that may impact supply delivery. If the potential for a shortage exists or if Metropolitan has enacted a WSAP stage, determine which Western shortage response level and actions are recommended to reduce/eliminate the shortage or to reduce demands on Metropolitan. Additionally, if the State declares a drought state of emergency and requires demand reductions, the WSCP Team will determine which water shortage level and response actions are needed to comply with the State mandate.	WSCP Team
MAY	Engineering, Operations and Water Resources (EOWR) Committee	If the potential for a shortage exists, if Metropolitan has enacted a WSAP stage or if the State has mandated demand reductions, the results of the Retail Annual Assessment will be presented to EOWR Committee, including the recommended shortage level and response actions.	Director of Water Resources
JUNE	Western Board of Directors	If the potential for a shortage exists, if Metropolitan has enacted a WSAP stage or the State has mandated demand reductions, the results of the Retail Annual Assessment will be presented to the Western Board of Directors, including the recommended shortage level and response actions. The Board of Directors may order the implementation of a shortage level	Director of Water Resources

TIMING	ASSESSMENT ACTIVITIES	PROCEDURE, KEY DATA INPUTS, EVALUATION CRITERIA AND OTHER CONSIDERATIONS	WESTERN STAFF RESPONSIBLE
		and will adopt a resolution declaring the applicable water shortage level.	Western Board of Directors
ON-GOING	Implement WSCP actions, if needed	Relevant members of Western staff will implement shortage response actions associated with the declared water shortage level.	WSCP Team
PRIOR TO JULY 1	Submit Retail Annual Assessment	Send Final Retail Annual Assessment to DWR.	Water Resources Specialist

1.3.3 Retail Water Shortage Levels

With the exception of a catastrophic failure of the Mills Gravity Line or other infrastructure failure of similar magnitude, Western does not foresee imposing a retail water shortage level except under the State’s direction, or in response to action taken by Metropolitan. If a potential water supply shortage is identified in the Retail Annual Assessment, this section provides information on the retail water shortage levels and response actions that Western may implement.

Western Retail uses six (6) shortage stages to identify and respond to water shortage emergencies, in alignment with the six standard shortage stages recommended by DWR and the Water Code. The six standard water shortage levels correspond to progressively increasing estimated shortage conditions (up to 10-, 20-, 30-, 40-, 50-percent, and greater than 50-percent shortage compared to the normal reliability condition) and align with the response actions that Western would implement to meet the severity of the impending shortages. The six (6) stages are provided in Table 5. Western promotes water use efficiency as a way of life, regardless of water shortage conditions, and keeps Stage 1 in effect at all times, at a minimum.

Table 5. Western Retail Water Shortage Contingency Plan Levels

SHORTAGE LEVEL	PERCENT SHORTAGE RANGE	WATER SHORTAGE CONDITION
1	Up to 10%	Stage 1 - Water Supply Watch – Water Use Efficiency is a Way of Life
2	Up to 20%	Stage 2 - Water Supply Alert
3	Up to 30%	Stage 3 - Water Supply Reduction– Targeting Unsustainable Use
4	Up to 40%	Stage 4 - Water Supply Reduction- Targeting Inefficient Use
5	Up to 50%	Stage 5 - Water Supply Reduction– Targeting Outdoor Use
6	Greater than 50%	Catastrophic Water Supply Loss – Targeting Indoor Use

1.3.4 Shortage Response Actions

Western expects to mitigate supply shortages through a variety of response actions including various supply sources, demand reduction actions, conservation, operational changes, outreach, and if necessary, mandatory prohibitions.

Supply Augmentation

Western currently maintains interconnections with the cities of Riverside and Corona, Eastern Municipal Water District and Elsinore Valley Municipal Water District. During water shortage emergencies, Western may be able to obtain supplemental water supply through these connections, if available.

Western Retail may also purchase additional imported or local groundwater supply from Western Wholesale.

Supply augmentation actions are summarized in Table 6.

Table 6. Supply Augmentation

SHORTAGE LEVEL	SUPPLY AUGMENTATION METHOD	HOW MUCH IS THIS GOING TO REDUCE THE SHORTAGE GAP?	ADDITIONAL EXPLANATION OR REFERENCE
All	Purchased or Imported Water	Up to 100%	Depends on supply availability from neighboring agencies or Western Wholesale

Demand Reduction

In addition to our existing budget-based rates, Western has identified a variety of demand reduction actions to offset supply shortages. These actions include, but are not limited to conservation and rebate programs, leak detection and repair, limitations on irrigation and other voluntary actions to reduce customer demand. Demand reduction actions are summarized in Table 7.

The Water Code Section 10623 (b) now requires that suppliers analyze and define water features that are artificially supplied with water, including ponds, lakes, waterfalls, and fountains, separately from swimming pools and spas, as defined in subdivision (a) of Section 115921 of the Health and Safety Code. Non-pool or non-spa water features may use or be able to use recycled water, whereas pools and spas must use potable water for health and safety considerations so limitations to pools and spas may require different considerations compared to non-pool or non-spa water features. Western’s Ordinance 394 includes a demand reduction response action that applies to both water features and swimming pools, requiring them to be equipped with recirculating pumps. While this response action is appropriate for both water features and pools and spas, Western will consider these features separately when the WSCP Ordinance is updated.

Table 7. Demand Reduction Actions

SHORTAGE LEVEL	DEMAND REDUCTION ACTIONS	ESTIMATED SHORTAGE GAP REDUCTION (AFY)	ADDITIONAL EXPLANATION OR REFERENCE	PENALTY, CHARGE, OR OTHER ENFORCEMENT
All	Landscape - Other landscape restriction or prohibition	500	Adjust automatic irrigation timers for weather patterns and landscape requirements; Texas Living Waters (Texas Living Waters Project, 2018)	Yes
All	Other - Require automatic shut of hoses			Yes
All	Landscape - Limit landscape irrigation to specific times	4,800	Texas Living Waters (Texas Living Waters Project, 2018)	Yes
All	Other water feature or swimming pool restriction		Features and pools shall be equipped with re-circulating pumps.	Yes
All	Other - Customers must repair leaks, breaks, and malfunctions in a timely manner	6,000	EPA Cases in Water Conservation: How Efficiency Programs Help Water Utilities Save Water and Avoid Costs (United States Environmental Protection Agency, Office of Water, 2002)	Yes
All	Landscape - Restrict or prohibit runoff from landscape irrigation			Yes
All	Water Savings from Rebate Program Participation	100	Historical estimate from Western's internal analyses.	No
3	Irrigation reduced to three (3) days	100	1% of outdoor irrigation usage	Yes
3	Irrigation reduced to two (2) days	1,900	18% of outdoor irrigation usage (California Water Efficiency Partnership (CalWEP), 2021)	Yes
3	Implement Drought Fine on Tier 4 Usage	1,000	Average Tier 4 usage and 25% of dedicated outdoor irrigation	Yes
4	Irrigation reduced to one (1) day	3,700	35% of outdoor irrigation usage (California Water Efficiency Partnership (CalWEP), 2021)	Yes
4	Implement Drought Fine on Tier 3 Usage	1,300	Average Tier 3 usage and 25% of dedicated outdoor irrigation.	Yes

SHORTAGE LEVEL	DEMAND REDUCTION ACTIONS	ESTIMATED SHORTAGE GAP REDUCTION (AFY)	ADDITIONAL EXPLANATION OR REFERENCE	PENALTY, CHARGE, OR OTHER ENFORCEMENT
5	Implement Drought Fine on Tier 2 Usage	10,900	Average Tier 2 usage and all of dedicated outdoor irrigation.	Yes
5 and Up	Other		No new potable service connections, temporary meters, or permanent meters	No
5 and Up	Landscape - Other landscape restriction or prohibition		No new landscapes unless irrigated with recycled water.	No
5 and Up	Landscape - Prohibit all landscape irrigation			Yes

Operational Changes

During shortage conditions, operations may be affected by supply augmentation or demand reduction responses. Western will consider its operational procedures at the time of a shortage to identify changes that can be implemented to address water shortage on a short-term basis.

Additional Mandatory Restrictions

Western has identified additional mandatory restrictions to implement in a water shortage emergency. Such restrictions will first be evaluated on the type of shortage condition and needs to close the gap between supply and demand needs.

Potential restrictions include, but are not limited to:

- Restricting watering to the hours of 8:00 pm to 6:00 am.
- No potable water for washing hard surfaces except to alleviate immediate fire or sanitation hazards, and then only by the use of certain water saving equipment.
- No runoff from irrigation or leaks.
- No installation of new landscapes unless irrigated with recycled water.
- No potable water for construction and dust control, except as necessary for public health, safety, and welfare.

Shortage Response Action Effectiveness

Western has estimated the effectiveness of shortage response actions when data pertaining to such actions is available. Estimates of the effectiveness for actions are included in Table 6 and Table 7. It is expected that response actions effectiveness is also a result of successful communication and outreach efforts, described below.

1.3.5 Communication Protocols

Western prioritizes effective communication, especially in times of a water shortage emergency. Western provides details on droughts, shortage stages and restrictions on its website at <https://www.wmwd.com/391/Drought-Restrictions>.

Western has a Strategic Communications team that oversees public affairs, legislative programs, and initiatives. The Strategic Communications team also develops programs and information about Western's efficiency programs, water reliability initiatives, and other educational programs. Western staff members also engage with their customers through presentations to community service organizations and other groups.

The Strategic Communications team created a strategic outreach plan that provides the framework for customer outreach as needed for Stage implementation for the Water Supply Shortage Contingency Plan.

It will be imperative to swiftly communicate with Western Retail customers as to what will be required and how to achieve the required water efficiency results. The following methods may be used to communicate information about stages to retail customers:

- **Bill message** – bill messages would be placed directly on customer bills and note key information about the specific Stage.
- **Bill insert** – inserts go out in Western's monthly water bills. Bill inserts would contain key information about the specific Stage.
- **Direct mail postcard** – postcards would feature specific information about the specific Stage and be mailed directly to customers.
- **Auto-call greeting/message** – telephonic, recorded message highlighting key information about the specific Stage would be sent to customers.
- **Website content** – website content containing key information about the specific Stage would be posted on Western's website.
- **Social media posts** – social media posts containing key information about the specific Stage would go on the District's Facebook and Twitter accounts; each Stage would utilize roughly 10 posts.
- **Fact sheet** – a fact sheet for each Stage with key information would be used within District offices, at community events, etc.
- **News release and/or advisory** – news release with key information and messages on each specific Stage would be provided to the media.

1.3.6 Compliance and Enforcement

Western always discourages excessive water consumption. Western may issue various penalties, charges, and other enforcement actions in response to violation of prohibitions in effect at a given time and/or stage, in accordance with CWC Section 377. Western's tiered-rate structure promotes conservation and discourages excessive use during all stages and is modified as more severe stages are enacted to act as a penalty for exceeding the water restrictions set by a stage. Enforcement measures in the WSCP are organized as:

- Notices
- Administrative compliance orders and fines and/or penalties
- Drought fine
- Recovery of costs
- Violations and remedies

Notices

If enforcement of the WSCP is required, Western will issue notices as appropriate. Any notice, notice of violation, cease-and-desist order, and administrative compliance order shall be served pursuant to the requirements of set in Ordinance 394. In addition to or in conjunction with the notice of violation, Western will provide notices as required for administrative compliance orders.

After one written notice of violation, Western may order a special meter reading or readings to ascertain whether wasteful or unreasonable use of water is occurring and may impose a meter reading fee for each meter reading it conducts.

Administrative Compliance Order and Fines and/or Penalties

Separate from, in addition to, or in combination with a notice of violation or cease and desist order, Western may issue an administrative compliance order against the Property Owner and/or occupant of the property where a violation of the WSCP occurred and/or any other Person responsible for a violation of the WSCP. Issuance of a notice of violation or a cease-and-desist order is not a prerequisite to the issuance of an administrative compliance order. The administrative compliance order shall allege the act(s) or failure(s) to act that constitute violations of the WSCP and shall set forth the penalty for the violation(s).

Western may impose administrative monetary fines and/or penalties, in addition to other appropriate action requirements and measures as described in the WSCP and summarized in Table 8.

Table 8. Administrative Compliance Actions

VIOLATION NUMBER	METERS SMALLER THAN 1"		METERS 1" OR LARGER	
	STAGES 1 & 2	STAGES 3, 4, 5 & 6	STAGES 1 & 2	STAGES 3, 4, 5 & 6
First	First written notice identifying violation, potential penalties, and compliance requirements		First written notice identifying violation, potential penalties, and compliance requirements	
Second ¹	Second written notice with copy of Ordinance 394, potential penalties, and compliance requirements		Second written notice with copy of Ordinance 394, potential penalties, and compliance requirements	
Third ¹	Fine of \$50/day for each day of the violation	Fine of \$100/day for each day of the violation	Fine of \$50/day for each day of the violation	Fine of \$150/day for each day of the violation
Fourth ¹	Fine of \$100/day for each day of the violation	Fine of \$200/day for each day of the violation	Fine of \$150/day for each day of the violation	Fine of \$300/day for each day of the violation
Fifth, and subsequent	Installation of flow-restricting device or termination of service; requires compliance and payment of fees prior to restoration of service		Installation of flow-restricting device or termination of service; requires compliance and payment of fees prior to restoration of service	

¹Within the preceding 12 calendar months.

Drought Fines

Any funds collected by Western as penalties for use of water in excess of a property’s allocated water budget during a declared water shortage will be deposited in a designated special funding account for the following uses:

- Enhanced conservation programs designed to reduce water demands;
- Outreach and Education Programs designed to reduce water demands, decrease water waste, or generally raise water awareness;
- Enforcement of any provision of Ordinance 394.

The Drought Fines are summarized in Table 9.

Table 9. Drought Fines

USAGE ABOVE TARGETED RESTRICTIONS	METERS 1" AND SMALLER					METERS LARGER THAN 1"				
	STAGES 1 & 2	STAGE 3	STAGE 4	STAGE 5	STAGE 6	STAGES 1 & 2	STAGE 3	STAGE 4	STAGE 5	STAGE 6
0-15% usage occurring in restricted category	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
16-25% usage occurring in restricted category	\$0	\$10	\$20	\$30	\$45	\$0	\$30	\$55	\$80	\$130
26-50% usage occurring in restricted category	\$0	\$20	\$30	\$40	\$55	\$0	\$55	\$80	\$100	\$155
50%+ usage occurring in restricted category	\$0	\$30	\$40	\$45	\$65	\$0	\$80	\$100	\$130	\$185

Recovery of Costs

Western will provide an invoice for costs to the Property Owner and/or occupant, or any other responsible party who is subject to an enforcement action. Additional fines, penalties, or fees, as determined by Western’s Board, may also be applied. These charges may include costs for:

- Visits of an Enforcement Officer or other staff for time incurred for meter reading, follow-up visits, or the installation or removal of a flow- restricting device.
- Monitoring, inspection, and surveillance procedures pertaining to enforcement of the WSCP.
- Enforcing compliance with any term or provision of the WSCP.
- Re-initiating service at a property where service has been discontinued pursuant to the WSCP.
- Processing any fees necessary to carry out the provisions of the WSCP

Violations and Remedies

Violations of the WSCP may result in a variety of responses, including declaration of criminal violation, issuance of a cease-and-desist order, civil actions, or a combination of the three. Violations are considered on-going, as described below.

Criminal Violation

It is unlawful for any person to willfully violate the provisions of the WSCP. Any violation of the WSCP is a misdemeanor, unless made an infraction by the prosecutor, subject to imprisonment in the county jail for not more than 30 days or by fine not to exceed \$1,000, or by both as provided in California Water Code section 377.

Civil Action

In addition to any other remedies provided in the WSCP, any violation of the WSCP may be enforced by civil action brought by Western and the imposition of administrative fines and/or penalties. In any such action, Western may seek, and the court may grant, as appropriate, any or all of the following remedies:

- a temporary and/or permanent injunction
- assessment of the violator for the costs of enforcement of the violation and for the reasonable costs of preparing and bringing legal action under the WSCP
- assessments under this subsection shall be paid to Western to be used exclusively for costs associated with implementing or enforcing the water supply shortage and regulatory provisions of the WSCP.

Cease-and-Desist Order

Western's General Manager may issue a cease-and-desist order directing the Property Owner, or occupant, or other Person in charge of day-to-day operations of any property, and/or any other Person responsible for a violation of the WSCP to immediately discontinue any prohibited use of water pursuant to Ordinance 394 and immediately cease any activity not in compliance with the terms, conditions, and requirements of this Ordinance 394.

Cumulative

All remedies provided in the WSCP shall be cumulative and not exclusive.

On-going

A Person shall be deemed guilty of a separate offense for every day or portion thereof during which any violation of any provision of the WSCP is committed, continued, or permitted.

1.3.7 Legal Authorities

Ordinance 394 was adopted and approved on January 19, 2022, by Western's Board of Directors. Ordinance 394 established Western's WSCP and declared that water resources shall be put to beneficial use to the fullest extent possible. Ordinance 394 provides Western with the authority to implement conservation programs and restrict water in emergencies or during droughts. Ordinance 394, included as Attachment 4, continues to serve as the legal foundation for Western's Retail WSCP.

Western shall coordinate with any city or county within which it provides water supply services for the possible proclamation of a local emergency, as defined in Section 8558 of the Government Code.

1.3.8 Financial Consequences of WSCP

Western anticipates that revenues will decrease as customers comply with the WSCP and any potential declared shortage stage. A three-point program has been developed to meet the fiscal shortfall from reduced revenues:

- Reduce operation, maintenance, and administration expenses.

- Defer selected capital improvement projects that are non-critical.
- Utilize reserves where needed to offset impact of reduced revenues.

Since most of the rate charged for water delivered to customers is used to pay for the cost of supply (e.g., local supplies purchased from neighboring agencies or imported water purchased from Metropolitan), the net impact from reduced water sales is the loss of revenue contributed by the Operations & Maintenance (O&M) component in the water rate. The O&M component in the water rate is used to help pay for a portion of the cost to provide water service to customers (e.g., water quality testing, maintenance and repairs, meter reading, customer billing, etc.). Revenue from the O&M component can be considered the “net revenue” received from water sales.

In addition, drought fines have encouraged conservation, thereby reducing net revenues from water sales. If the water shortage is deemed temporary, a rate increase may not be required. However, for long-term shortages, rate increases and/or drought surcharges applied to the water rate would be considered to make up for reduced net revenue. A consequence of increasing the commodity cost may be further conservation by customers. Fixed monthly service charges that are not commodity-based are not expected to significantly change due to a water shortage. These charges would continue to provide revenue to pay for O&M expenditures.

Water shortages may also impact construction activities, especially during Stage 5 and 6, when water use for construction is heavily restricted, and a moratorium is in place for new meters and approval of new service. A reduction in construction activities will reduce fees collected by Western from developers, such as capacity charges, as well as engineering related fees, such as plan check fees and annexation fees.

As consumption decreases and additional conservation programs and/or efforts are implemented, purchased water, and purchased power expenses will decrease. Staff costs and other costs for community education, enforcement of ordinances, monitoring and evaluation of water use, drought planning, and assisting with customer questions and complaints are expected to rise. If construction is drastically reduced, staff may not be required for certain functions, but it is expected that the increased workload to deal with water shortage issues will more than offset the reduced workload for construction support. While total labor costs may not increase, the priorities of some existing staff will shift to increase support for implementation of the WSCP. Table 10 summarizes general estimates of potential impacts to revenues and expenditures related to water shortage.

Table 10. Revenue and Expenditure Impacts

REVENUE/EXPENDITURE IMPACT	ESTIMATED DEGREE OF IMPACT
Reduced Sales	Decrease in water sales could range from 10 to 30%.
Reduced Development	Reduction in fees collected during planning and construction activities.
Increased Staff Cost	Existing staff will be used where available, but additional temporary staff may be needed.
Increased O&M Cost	Other non-purchased water/power O&M costs could increase by 1 to 5%, including identifying and quickly repairing all system water leaks.
Increased Cost of Supply	Only if assessed penalties from Metropolitan for exceeding drought determined water allocation.

Western has developed reserve funds to sustain the revenue and expenditure impacts of a short-term water shortage. Reserve funds could be used for a 1- to 2-year period to cover the impact of reduced water sales. However, these reserves will need to be restored to minimum levels after the water shortage. If the water shortage is long-term, rate increases, and drought surcharges are expected to be considered to mitigate the financial impact. Long-term water shortages may also require reducing capital expenditures by delaying projects for major facilities construction, upgrade, or replacement, limiting new connections to decrease operational expenditures and to decrease the likelihood of exceeding imported water allocations, and evaluating methods to reduce administrative overhead. Summaries of measures to overcome revenue and expenditure impacts are provided in Table 11.

Table 11. Mitigation to Financial Impacts

BUDGET SOURCE	POTENTIAL MEASURES
Reduce O&M and Overhead	Defer maintenance where feasible. Defer overhead expenses where possible. If staff reductions are required, service level will be impacted.
Decrease Capital Expenditures	Delay major construction projects for facilities as well as upgrades and replacements.
Reserves	Use of reserves may provide short-term rate stabilization but will require delays in capital expenditures and require rebuilding reserves after the water shortage.

1.3.9 Monitoring and Reporting

Water savings from implementation of the WSCP will be determined by consumption and production meter readings. Customer meters will be read every month in Stages 1, 2, and 3, and weekly in Stages 4, 5, and 6. If necessary, Western may read customer meters more often, especially for customers that exceed their water budget. Western will monitor production meters on a weekly basis.

Under normal conditions, Western monitors sales and deliveries on a monthly and daily basis. All of Western’s water sales are metered and all connections are read monthly. Water orders are scheduled daily with water deliveries recorded daily. Water deliveries and transfers at booster stations can be monitored through Western’s Supervisory Control and Data Acquisition (SCADA) system to determine usage in various portions of the retail area. Western prepares monthly sales and delivery reports that are reviewed and compared to previous reports and statistics for prior months and seasons. Under shortage conditions, Western may prepare these reports daily. In addition, billing reports may be reviewed to identify users who are exhibiting high water use so that Western may work with them to reduce their demand.

1.4 Emergency Response, Seismic Risk Assessment and Mitigation

1.4.1 Emergency Response Plan

In the event of a catastrophic supply interruption, Western would follow its Emergency Response Plan (ERP) in addition to the WSCP.

In 2020, Western completed a Risk and Resilience Assessment (RRA) and Emergency Response Plan (ERP) in accordance with America's Water Infrastructure Act (AWIA) of 2018. The purpose of the RRA and ERP is to meet the AWIA compliance requirements and plan for long-term resilience of Western's infrastructure. The RRA assessed Western's water system in order to identify critical assets and processes that may be vulnerable to human and natural hazards, and to identify measures that can be taken to reduce risk and enhance resilience from service disruption for the benefit of customers. The RRA identifies and characterizes both infrastructure-specific and system-wide vulnerabilities and threats and quantifies the consequences of disruption. The RRA also identifies various options (and constraints) in addressing and mitigating risk. The RRA, in conjunction with the ERP, charts a course for water system resilience. The RRA also provided various recommendations to increase reliability of Western's system. Since critical pieces of infrastructure and specific vulnerabilities are detailed in the RRA and ERP, the contents of the document are confidential and for use by Western staff only.

1.4.2 Seismic Risk Assessment and Mitigation Plan

Per the Water Code Section 10632.5, suppliers are required to assess seismic risk to water supplies as part of their WSCP. Western published a Local Hazard Mitigation Plan (LHMP) in 2017 that identified relevant local hazards, reviewed and assessed past disasters, estimated the probability of future disaster occurrences, and set goals to mitigate potential risks and reduce or eliminate longer-term risks to people and property from both natural and man-made hazards. The LHMP identified risks pertaining to earthquakes, floods, wildfires, landslides, pandemics, high winds, drought, power outages, hazardous materials, terrorism, and several others. On a scale of 0 to 4, the LHMP identified the probability of an earthquake occurring and its severity as a 3. An earthquake was ranked as the 6th most important hazard to plan for, after a pipeline issue, power outage, extreme summer or winter weather, drought, and a severe wind event (Western Municipal Water District, 2017).

Historically, Western has experienced a couple of large earthquakes. The most significant earthquakes in the region both occurred in June 1992 and were the Landers earthquake with a 7.3 magnitude, and the Big Bear earthquake with a 6.4 magnitude (the Big Bear earthquake was an aftershock to the Landers earthquake). Both earthquakes were over 40 miles from Western and did not cause any significant damage to Western's infrastructure (Western Municipal Water District, 2017). It is expected that faults within Western's region could generate an earthquake with an 8.2 magnitude or greater and would severely impact Western's infrastructure.

- The LHMP identified various projects Western has planned to mitigate seismic risks and impacts, including:
- Study to determine if the installation of seismically activated valves for drinking and/or irrigation water would be operationally and fiscally beneficial to maintain water supply and service after an earthquake.

- Acquiring debris removal equipment for use after a disaster. Western can perform typical pipeline repairs and debris removal but may require more robust equipment to remove large amounts of debris after a disaster.
- Develop a staff team trained to evaluate the safety of Emergency Operations Center locations immediately following an earthquake. Project includes training in post-earthquake structural evaluation.
- Purchase a greater variety of materials and sizes for pipeline repair. Items may include PVC pipe, steel pipe, ductile iron fittings, air vacs, and valves. Materials would be stockpiled throughout Western's service area to be readily available after an earthquake.
- Provide additional back-up power for use during large scale power failures at all pump stations.
- Map and possibly relocate pipeline alignments near creeks or areas subject to ground movement such as landslide and rock areas.
- Perform a seismic evaluation of entire water distribution system to determine priority of retrofit projects.
- Perform seismic analysis and retrofits to older tanks that were constructed to past seismic standards.
- Install Compressed Natural Gas (CNG) tanks at natural gas-powered facilities as several transmission mains within Western's service area are powered by natural gas.

1.5 WSCP Refinement Procedures

The WSCP is best prepared and implemented as an adaptive management plan. Western will use results obtained from its monitoring and reporting program to evaluate any needs for revisions. Potential changes to the WSCP that would warrant an update include, but are not limited to, any changes to trigger conditions, changes to the shortage stage structure, changes to rate structures or development of water budgets, and/or changes to customer reduction actions.

Any prospective changes to the WSCP would need to be presented to Western's Board of Directors (Board) for approval. Western will hold a public hearing, obtain any comments, and formally adopt the updated WSCP. Notices for refinement and the public hearing date will be published in the local newspaper in advance of any public meetings.

1.6 Plan Adoption, Submittal, Availability

The WSCP will be presented for adoption to Western's Board at a public meeting. The Board and members of the public may submit any comments prior to approval and adoption. Once the revised WSCP has been adopted by Western's Board, the WSCP will be submitted to DWR.

The WSCP will be made available to all staff, customers, and any affected cities, counties, or other members of the public through Western's website, located under the Water Reliability, Drought and Restrictions section.

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Attachment 1 - Metropolitan Water Supply Allocation Plan

Water Supply Allocation Plan



December 2014 Revision



Metropolitan Water District of
Southern California

Inside cover: Photo courtesy of Cora Edmonds/ArtXchange for the Healing Planet

Water Supply Allocation Plan

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List of Acronyms

AF – Acre-feet
CUP – Groundwater Conjunctive Use Program
CWD – County Water District
DWP – Drought Management Plan
IAWP – Interim Agricultural Water Program Reductions and Rates
IICP – Incremental Interruption and Conservation Plan
IRP – Integrated Resources Plan
GPCD – Gallons per Capita per Day
M&I – Municipal and Industrial
MWD – Municipal Water District
RUWMP – Regional Urban Water Management Plan
SWP – State Water Project
WSAP – Water Supply Allocation Plan
WSDM – Water Surplus and Drought Management

Definitions

Extraordinary Supplies- Deliberate actions taken by member agencies to augment the total regional water supply only when Metropolitan is allocating supplies through the WSAP.

Groundwater Recovery- The extraction and treatment of groundwater making it usable for a variety of applications by removing high levels of chemicals and/or salts.

In-lieu deliveries- Metropolitan-supplied water bought to replace water that would otherwise be pumped from the groundwater basins.

Seawater Barrier- The injection of fresh water into wells along the coast to protect coastal groundwater basins from seawater intrusion. The injected fresh water acts like a wall, blocking seawater that would otherwise seep into groundwater basins as a result of pumping.

Section 1: Introduction

Calendar Year 2007 introduced a number of water supply challenges for the Metropolitan Water District of Southern California (Metropolitan) and its service area. Critically dry conditions affected all of Metropolitan's main supply sources. In addition, a ruling in the Federal Courts in August 2007 provided protective measures for the Delta Smelt in the Sacramento-San Joaquin River Delta which brought uncertainty about future pumping operations from the State Water Project. This uncertainty, along with the impacts of dry conditions, raised the possibility that Metropolitan would not have access to the supplies necessary to meet total firm demands¹ and would have to allocate shortages in supplies to the member agencies.²

In preparing for this possibility, Metropolitan staff worked jointly with the member agency managers and staff to develop a Water Supply Allocation Plan (WSAP). The WSAP includes the specific formulas for calculating member agency supply allocations and the key implementation elements needed for administering an allocation should a shortage be declared. The WSAP became the foundation for the urban water shortage contingency analysis required under Water Code Section 10632 and was incorporated into Metropolitan's 2010 Regional Urban Water Management Plan (RUWMP).

Section 2: Development Process

Member Agency Input

Between July 2007 and February 2008, Metropolitan staff worked cooperatively with the member agencies through a series of member agency manager meetings and workgroups to develop a formula and implementation plan to allocate supplies in case of shortage. These workgroups provided an arena for in-depth discussion of the objectives, mechanics, and policy aspects of the different parts of the WSAP. Metropolitan staff also met individually with fifteen member agencies for detailed discussions of the elements of the recommended proposal. Metropolitan introduced the elements of the proposal to many nonmember retail agencies in its service area by providing presentations and feedback to a number of member agency caucuses, working groups, and governing boards. The discussions, suggestions, and comments expressed by the member agencies during this process contributed significantly to the development of this WSAP.

Board of Directors Input

Throughout the development process Metropolitan's Board of Directors was provided with regular progress reports on the status of this WSAP, with oral reports in September, October, and December 2007, an Information Board of Directors Letter with a draft of the WSAP in November 2007, and a Board of Directors Report with staff recommendations in January 2008. Based on Water Planning and Stewardship Committee discussion of the staff recommendations and further review of the report by

¹ Firm demands are also referred to as uninterruptable demands; likewise non-firm demands are also called interruptible demands.

² See Appendix A: Metropolitan Member Agencies.

the member agencies, refinements were incorporated into the WSAP for final consideration and action in February 2008. The WSAP was adopted at the February 12, 2008 Board of Directors meeting.³

The 12-Month Review Process

When the Board adopted the WSAP in February 2008, the decision specified a formal revisit of the WSAP commencing in February 2010. The scheduled revisit was meant to ensure the opportunity for Metropolitan staff and the member agencies to re-evaluate the WSAP and recommend appropriate changes to the Board of Directors.

In April 2009, the Board voted to implement the WSAP for the first time. The WSAP was implemented at a Level 2 allocation level, and was in effect for the period of July 1, 2009, through June 30, 2010. Since implementation of the 2009/10 WSAP began in July 2009, a number of practical issues relating to the WSAP were identified by staff and the member agencies for further consideration during the 12-Month Review Process. Metropolitan staff engaged with the member agencies in a formal review of the WSAP from January through May 2010. During the review process the member agency managers participated in a series of six workshops. The focus of these workshops was to facilitate in-depth discussion on WSAP-related issues and lessons learned since the WSAP was implemented in July 2009. The proposed adjustments to the WSAP developed during the review process were adopted at the August 17, 2010 Board of Directors meeting⁴.

The Three-Year Review Process

The Board action to adopt of the WSAP in February 2008 also directed staff to review the WSAP formula three years after the February 2008 adoption. February 2011 marked the three-year anniversary since the adoption of the WSAP. Similar to the 12-Month Review Process, the purpose of the Three-Year Review Process was to provide an opportunity for Metropolitan staff and the member agencies to re-evaluate the plan and recommend appropriate changes for board consideration.

Metropolitan staff met with the member agencies in a formal review of the WSAP from February through August 2011. Staff and member agency managers participated in a series of eleven workshops. Proposed adjustments to the WSAP developed during the process were adopted at the September 13, 2011 Board of Directors meeting.⁵

³ A complete listing of member agency meetings and Board of Directors reporting activities is contained in Appendix B: Water Supply Allocation Plan Process Timeline.

⁴ A complete listing of member agency meetings and Board of Directors reporting activities is contained in Appendix C: 12-Month Review Process and Results.

⁵ A complete listing of member agency meetings and Board of Directors reporting activities is contained in Appendix D: Three-Year Review Process and Results.

2014 Review Process

In 2014, California was challenged with a third year of severe drought.⁶ Metropolitan managed its operations through significant use of regional storage reserves. It was anticipated that end of year total dry storage reserves would approach levels similar to those when the WSAP was last implemented in 2009.

Following discussion at the June 2014 Water Planning and Stewardship Committee, Metropolitan staff convened a member agency working group to revisit the WSAP. The purpose of the working group was to collaborate with member agencies to identify potential revisions to the WSAP in preparation for mandatory supply allocations in 2015. There were eight working group meetings and three discussions at the monthly Member Agency Managers' Meetings.

The process focused on three areas of the WSAP: the Base Period, the Allocation Formula, and the Allocation enforcement mechanism. Proposed adjustments to the WSAP developed during the process were adopted at the December 9, 2014 Board of Directors meeting.⁷

⁶ The Governor of California proclaimed a State of Emergency due to drought conditions on January 17, 2014 and, on April 24, 2014 issued an Executive Order proclaiming a continued State of Emergency noting drought conditions have persisted for the last three years and authorizing adoption and implementation of emergency regulations.

⁷ A complete listing of member agency meetings and Board of Directors reporting activities is contained in Appendix E: 2014 Review Process and Results.

Section 3: Review of Historical Shortage Plans⁸

The WSAP incorporates key features and principles from the following historical shortage allocation plans but will supersede them as the primary and overarching decision tool for water shortage allocation.

Interruptible Water Service Program

As part of the new rate structure implemented in 1981, Metropolitan's Board of Directors adopted the Interruptible Water Service Program (Interruptible Program) which was designed to address short-term shortages of imported supplies. Under the Interruptible Program, Metropolitan delivered water for particular types of use to its member agencies at a discounted rate. In return for this discounted rate, Metropolitan reserved the right to interrupt delivery of this Interruptible Program water so that available supplies could be used to meet municipal and industrial demands.

Incremental Interruption and Conservation Plan

The ability to interrupt specific deliveries was an important element of Metropolitan's strategy for addressing shortage conditions when it adopted the Incremental Interruption and Conservation Plan (IICP) in December 1990. Reductions in IICP deliveries were used in concert with specific objectives for conservation savings to meet needs during shortages. The IICP reduced Interruptible Service deliveries in stages and provided a pricing incentive program to insure that reasonable conservation measures were implemented.

1995 Drought Management Plan

The 1995 Drought Management Plan (DMP) was a water management and allocation strategy designed to match supply and demand in the event that available imported water supplies were less than projected demands. Adopted by the Metropolitan Board of Directors in November 1994, the 1995 DMP was a short-term plan designed to provide for the 1995 calendar year only. The primary objective of the 1995 DMP was to identify methods to avoid implementation of mandatory reductions. The 1995 DMP included various phases and a step-by-step strategy for evaluating supply and demand conditions and utilizing Metropolitan's available options, with the final phase being implementation of the revised IICP.

1999 Water Surplus and Drought Management Plan

Metropolitan staff began work on the Water Surplus and Drought Management (WSDM) Plan in March 1997 as part of the Integrated Water Resources Plan (IRP), which was adopted by Metropolitan's Board of Directors in January 1996. The IRP established regional water resource targets, identifying the need for developing resource management policy to guide annual operations. The WSDM Plan defined Metropolitan's resource management policy by establishing priorities for the use of regional resources to achieve the region's reliability goal identified in the IRP. In April 1999, Metropolitan's Board of Directors adopted the WSDM Plan.

⁸ A summary of the key elements in the following allocation plan is found in Appendix F: Summary of Historical Shortage Plans.

The WSDM Plan also included a set of principles and considerations for staff to address when developing specific allocation methods. The WSDM Plan stated the following guiding principle to be followed in developing any future allocation scheme:

“Metropolitan will encourage storage of water during periods of surplus and work jointly with its member agencies to minimize the impacts of water shortages on the region’s retail consumers and economy during periods of shortage.”⁹

This principle reflects a central desire for allocation methods that are both equitable and minimize regional hardship to retail water consumers. The specific considerations postulated by the WSDM Plan to accomplish this principle include the following:¹⁰

- The impact on retail customers and the economy
- Allowance for population and growth
- Change and/or loss of local supply
- Reclamation/Recycling
- Conservation
- Investment in local resources
- Participation in Metropolitan’s interruptible programs
- Investment in Metropolitan’s facilities.

Section 4: Water Supply Allocation Formula

Based on the guiding principle and considerations described in the WSDM Plan, Metropolitan staff and the member agencies developed a specific formula for allocating water supplies in times of shortage. The formula seeks to balance the impacts of a shortage at the retail level while maintaining equity on the wholesale level, and takes into account growth, local investments, changes in supply conditions and the demand hardening¹¹ aspects of non-potable recycled water use and the implementation of conservation savings programs. The formula, described below, is calculated in three steps: base period calculations, allocation year calculations, and supply allocation calculations.¹² The first two steps involve standard computations, while the third section contains specific methodology developed for this WSAP.

Base Period Calculations

The first step in calculating a water supply allocation is to estimate water supply and demand using a historical base period with established water supply and delivery data. The base period for each of the different categories of demand and supply is calculated using data from the fiscal years (July through June) ending 2013 and 2014.¹³

⁹ WSDM Plan, p. 1. Emphasis added.

¹⁰ WSDM Plan, p. 2.

¹¹ Demand hardening is the effect that occurs when all low-cost methods of decreasing overall water demand have been applied (e.g., low-flow toilets, water recycling) and the remaining options to further decrease demand become increasingly expensive and difficult to implement.

¹² Detailed operational elements of these objectives and a numerical example are discussed in Appendix G: Water Supply Allocation Formula Example.

¹³ Exceptions to this methodology are noted in the descriptions of base period calculations.

Base Period Local Supplies: Local supplies for the base period are calculated using a two-year average of groundwater production, groundwater recovery, Los Angeles Aqueduct supply, surface water production, and other imported supplies. Non-potable recycling production is not included in this calculation due to its demand hardening effect.

Base Period Wholesale Demands: Demands on Metropolitan for the base period are calculated using a two-year average of firm purchases and in-lieu deliveries to long-term groundwater replenishment, conjunctive use, cyclic, and supplemental storage programs.

Base Period Retail Demands: Total retail-level municipal and industrial (M&I) demands for the base period are calculated by adding the Base Period Wholesale Demands and the Base Period Local Supplies. This estimates an average total demand for water from each agency.

Base Period Mandatory Conservation Credit: Metropolitan allows a consultation process that enables member agencies to describe mandatory water use restrictions and/or rationing restrictions that were in place within their service areas during the Base Period. Restrictions may vary among agencies but include restricted water uses, fines, and water budget or penalty based rate structures that are enacted by the governing body of the member agency or retail agency. Following the consultation process, Metropolitan staff will recommend adjustments based on evidence of reduced GPCD. To qualify for an adjustment, GPCD reductions would have to be observed that are beyond those expected from the agency's ongoing conservation efforts and trends.

Allocation Year Calculations

The next step in calculating the water supply allocation is estimating water needs in the allocation year. This is done by adjusting the base period estimates of retail demand for population or economic growth and changes in local supplies.

Allocation Year Retail Demands: Total retail M&I demands for the allocation year are calculated by adjusting the Base Period Retail Demands for baseline inflation and growth.

Baseline Inflation Adjustment: Baseline inflation occurs when non-potable recycling or conservation is developed after the Base Period. The development of these supplies reduces actual demands for water in the Allocation Year. Because non-potable-recycling and conservation are excluded from the WSAP formula, the actual need for water in the Allocation year is overestimated. The Baseline Inflation Adjustment removes increases in non-potable recycling and conservation annually from the Base Period forward to better reflect the true need for water in the Allocation Year.

Growth Adjustment: The growth adjustment is calculated using the estimated actual annual rate of population growth at the county level, as generated by the California Department of Finance, whenever possible. For years without complete data, the growth rate is calculated using an average of the three most recent years available. Growth will be allocated based on historical per capita water use during the Base Period, with a cap equal to Metropolitan's IRP Target for Water Use Efficiency. For

allocation years up to and including 2014, the cap will be 163 GPCD, and for allocation years 2015-2020 the cap will reduce linearly from 163 to 145 GPCD. On an appeals basis, member agencies may request that their adjustment be calculated using member agency level population growth. A weighted combination of actual population and actual employment growth rates may also be requested.

Allocation Year Local Supplies: Allocation Year Local Supplies include groundwater production, groundwater recovery, Los Angeles Aqueduct supply, surface water production, seawater desalination, and other imported supplies. Estimates of Allocation Year Local Supplies are provided by the member agencies upon implementation of a WSAP. If estimates are not provided, Metropolitan will use the sum of the Base Period Local Supplies and Base Period In-Lieu Deliveries as a default. Agencies may provide updated estimates at any time during the Allocation Year to more accurately reflect their demand for Metropolitan supplies.

Extraordinary Supplies: Under the WSAP formula, local supply production in the Allocation Year can either be designated as a “planned” supply, or as an “extraordinary” supply.¹⁴ This is an important designation for a member agency because the two types of supplies are accounted for differently in the WSAP formula. Local supplies classified at Extraordinary Supply are only partially included (scaled depending on the WSAP Level) as local supplies. This has the effect of providing significantly more benefit to the member agency in terms of total water supply that is available to the retail customer.¹⁵

Allocation Year Wholesale Demands: Demands on Metropolitan for the allocation year are calculated by subtracting the Allocation Year Local Supplies from the Allocation Year Retail Demands.

Water Supply Allocation Calculations

The final step is calculating the water supply allocation for each member agency based on the allocation year water needs identified in Step 2. The following table displays the elements that form the basis for calculating the supply allocation. Each element and its application in the allocation formula are discussed below.

Table 1: Shortage Allocation Index		
(a) Regional Shortage Level	(b) Wholesale Minimum Percentage	(c) Maximum Retail Impact Adjustment Percentage
1	92.5%	2.5%
2	85.0%	5.0%
3	77.5%	7.5%
4	70.0%	10.0%

¹⁴ Appendix H: Board Policy Principles on Determining the Status of Extraordinary Supply lists the key Board principles used in determining if a supply qualifies as an Extraordinary Supply.

¹⁵ See Appendix G: Water Supply Allocation Formula Example for specific allocation formulae.

5	62.5%	12.5%
6	55.0%	15.0%
7	47.5%	17.5%
8	40.0%	20.0%
9	32.5%	22.5%
10	25.0%	25.0%

Regional Shortage Level: The WSAP formula allocates shortages of Metropolitan supplies over ten levels.

Wholesale Minimum Allocation: The Wholesale Minimum Allocation ensures a minimum level of Metropolitan supplied wholesale water service to each member agency.

Maximum Retail Impact Adjustment: The purpose of this adjustment is to ensure that agencies with a high level of dependence on Metropolitan do not experience disparate shortages at the retail level compared to other agencies when faced with a reduction in wholesale water supplies. The Maximum Retail Impact Percentage is prorated on a linear scale based on each member agency’s dependence on Metropolitan at the retail level. This percentage is then multiplied by the agency’s Allocation Year Wholesale Demand to determine an additional allocation.

Conservation Demand Hardening Credit: The Conservation Demand Hardening Credit addresses the increased difficulty in achieving additional water savings at the retail level that comes as a result of successful implementation of water conserving devices and conservation savings programs. To estimate conservation savings, each member agency will establish a historical baseline Gallons Per Person Per Day (GPCD) calculated in a manner consistent with California Senate Bill SBx7-7.¹⁶ Reductions from the baseline GPCD to the Allocation Year are used to calculate the equivalent conservation savings in acre-feet. The Conservation Demand Hardening Credit is based on an initial 10 percent of the GPCD-based Conservation savings plus an additional 5 percent for each level of Regional Shortage set by the Board during implementation of the WSAP. The credit will also be adjusted for:

- The overall percentage reduction in retail water demand
- The member agency’s dependence on Metropolitan

The credit is calculated using the following formula:

$$\text{Conservation Demand Hardening Credit} = \text{Conservation Savings} \times (10\% + \text{Regional Shortage Level Percentage}) \times (1 + ((\text{Baseline GPCD} - \text{Allocation Year GPCD}) / \text{Baseline GPCD})) \times \text{Dependence on MWD Percentage}$$

¹⁶ California Department of Water Resources, February 2011, “Methodologies for Calculating Baseline and Compliance Urban Per Capita Water Use. Available at:

http://www.water.ca.gov/wateruseefficiency/sb7/docs/MethodologiesCalculatingBaseline_Final_03_01_2011.pdf

This provides a base demand hardening credit equal to 10 percent of conservation savings and increases the credit as deeper shortages occur, which is when conservation demand hardening has a bigger impact on the retail consumer. The credit also increases based on the percentage of an agency's demand that was reduced through conservation. This accounts for increased hardening that occurs as increasing amounts of conservation are implemented. Lastly, the credit is scaled to the member agency's dependence on Metropolitan to ensure that credits are being applied to the proportion of water demand that is being affected by reductions in Metropolitan supply.

Minimum Per-Capita Water Use Credit: This adjustment creates a minimum per capita water use threshold. Member agencies' retail-level water use is compared to two different thresholds. The proposed minimum thresholds are based upon compliance guidelines established under Senate Bill X7-7.

- 100 GPCD total water use
- 55 GPCD residential water use

Agencies that fall below either threshold under the WSAP will receive additional allocation from Metropolitan to bring them up to the minimum GPCD water use level. If an agency qualifies under both thresholds, the one resulting in the maximum allocation adjustment will be given.¹⁷ To qualify for this credit, member agencies must provide documentation of the total agency level population and the percent of retail level demands that are residential; no appeal is necessary.

Total WSAP Allocation: The allocation to an agency for its M&I retail demand is the sum of the Wholesale Minimum Allocation, the Retail Impact Adjustment, the Conservation Demand Hardening Credit, and the Minimum Per-Capita Water Use Credit.¹⁸

Total Metropolitan Supply Allocations: In addition to the WSAP Allocation described above, agencies may also receive separate allocations of supplies for and seawater barrier and groundwater replenishment demands. Allocations of supplies to meet seawater barrier demands are to be determined by the Board of Directors independently but in conjunction with the WSAP. Separating the seawater barrier allocation from the WSAP allocation allows the Board to consider actual barrier requirements in the Allocation Year and address the demand hardening issues associated with cutting seawater barrier deliveries. According to the principles outlined for allocating seawater barrier demands, allocations should be no deeper than the WSAP Wholesale Minimum Percentage implemented at that time.

The WSAP also provides a limited allocation for drought-impacted groundwater basins based on the following framework:¹⁹

¹⁷ See Appendix J: Per Capita Water Use Minimum Example for specific minimum per-capita water use credit formulae and example.

¹⁸ See Appendix G: Water Supply Allocation Formula Example for specific allocation formulae.

¹⁹ See Appendix L: Groundwater Replenishment Allocation for more information.

1. Metropolitan staff will hold a consultation with the requesting member agency and the appropriate groundwater basin manager to document whether the basin is in one of the following conditions:
 - a. Groundwater basin overdraft conditions that will result in water levels being outside normal operating ranges during the WSAP allocation period; or
 - b. Violations of groundwater basin water quality and/or regulatory parameters that would occur without imported deliveries
2. An allocation is provided based on the verified need for groundwater replenishment. The allocation would start with a member agency's ten-year average purchases of imported groundwater replenishment supplies (excluding years in which deliveries were curtailed). The amount would then be reduced by the declared WSAP Regional Shortage Level.

Section 5: WSAP Implementation

The WSAP will take effect if a regional shortage is declared by the Board of Directors. The following implementation elements are necessary for administering the WSAP during a time of shortage. These elements cover the processes needed to declare a regional shortage level as well as provide information pertaining to the allocation surcharge.

Allocation Period

The allocation period covers twelve consecutive months, from July of a given year through the following June. This period was selected to minimize the impacts of varying State Water Project (SWP) allocations and to provide member agencies with sufficient time to implement their outreach strategies and rate modifications.

Setting the Regional Shortage Level

Metropolitan staff is responsible for recommending a Regional Shortage Level for the Board of Directors' consideration. The recommendation shall be based on water supply availability, and the implementation of Metropolitan's water management actions as outlined in the WSDM Plan.

Metropolitan staff will keep the Board of Directors apprised to the status of water supply conditions and management actions through monthly reports to the Water Planning and Stewardship Committee. To further facilitate staff in the development of a recommended regional shortage level, member agency requests for local supply adjustments shall be submitted by April 1st.

Metropolitan's Board of Directors, through the Water Planning and Stewardship Committee, is responsible for approving the final Regional Shortage Level at its April meeting. By the April meeting, the majority of the winter snowfall accumulation period will have passed and will allow staff to make an allocation based on more stable water supply estimates. Barring unforeseen large-scale circumstances, the Regional Shortage Level will be set for the entire allocation period, which will provide the member agencies an established water supply level for their planning.

Exit Strategy

While the Board ultimately has discretion to implement or lift and allocation at any point of time during the year; the WSAP includes a two-part exit strategy that is meant to streamline the WSAP implementation decision making process.

- If the Board decides to implement the WSAP, then any current WSAP allocation would remain in place until the end of the Allocation Year.
- If the Board decides not to implement the WSAP, then any current WSAP allocation would be terminated concurrent with the Board decision.

Allocation Appeals Process

An appeals process is necessary for the administration of any changes or corrections to an agency's allocation. Metropolitan's General Manager will designate, subsequent to a declaration of an allocation by the Board of Directors, an Appeals Liaison as the official point of contact for all information and inquiries regarding appeals. All member agency General Managers will be notified in writing of the name and contact information of the Appeals Liaison. Only appeals that are made through the Appeals Liaison and in accordance with the provisions outlined in Appendix N: Allocation Appeals Process will be evaluated. Basis for appeals claims can include but are not limited to:

- Adjusting erroneous historical data used in base period calculations
- Adjusting for population growth rates
- Determining if a local supply qualifies as Extraordinary Supply

Additional details and a checklist for the appeals process are available in Appendix N: Allocation Appeals Process and Appendix O: Appeals Submittal Checklist.

Allocation Surcharge

Member agency allocations are supported by an Allocation Surcharge. The Allocation Surcharge is charged to water use above the Member Agency allocation and is charged in addition to Metropolitan's standard rates for water service. Allocation Surcharges will only be assessed to the extent that an agency's total annual usage exceeds its total annual allocation. Any revenues collected through the Allocation Surcharge will be applied towards Metropolitan's Water Management Fund, which is used to in part to fund expenditures in dry-year conservation. No billing or assessment of allocation surcharges rates will take place until the end of the twelve-month allocation period.

Allocation Surcharge: The application of the Allocation Surcharge structure is a two tier structure that provides a lower level of Allocation Surcharge for minor overuse of allocations and a higher level of Allocation Surcharge for major overuse of allocations. The structure and applicable Allocation Surcharges are listed in Table 2.

Table 2: Allocation Surcharge			
Water Use	Base Water Rate ²⁰	Allocation Surcharge ²¹	Total Rate
100% of Allocation	Tier 1	0	Tier 1
Between 100% and 115%	Tier 1	\$1,480	Tier 1 + (\$1,480)
Greater than 115%	Tier 1	\$2,960	Tier 1 + (\$2,960)

Qualifying Income-Based Rate Allocation Surcharge Adjustment:²² Any Allocation Surcharges incurred by a member agency under the WSAP will be adjusted to reflect the extent to which retail customers within a member agency’s service area are served under a “lifeline” or similar qualified discounted rate program based on income or ability to pay (“Income-Based Rate”).

Any member agency who is assessed Allocation Surcharges under the WSAP may submit an acre-foot equivalent of water used by retail customers served under a qualifying Income-Based Rate.²³ This amount of water use would be multiplied by the percentage of retail-level reduction in allocation year demand necessary for that member agency to avoid exceeding its WSAP allocation. The monetary amounts resulting from these acre feet are subtracted from the total monetary amounts incurred by an agency for exceeding its allocation. In the case that the monetary amounts associated with the Income-Based Rate are greater than the total Allocation Surcharges an agency incurs, no Allocation Surcharges will be incurred. The end result of this adjustment is that the member agency will not be subject to Allocation Surcharges for the use of water by their retail customers served under a qualifying Income-Based Rate.

Growth Rate Allocation Surcharge Adjustment: In recognition of member agency differences in geography and climate, a Growth Rate Allocation Surcharge Adjustment will be given to any agency that exceeds its WSAP Allocation. The Allocation Surcharge reduction will be based on the difference in acre-feet between the Growth Adjustment applied at Metropolitan’s IRP planning goal rate, and the greater of the following:

- The IRP planning goal rate adjusted for the member agency’s ETo, or
- The member agency’s certified and documented 20x2020 targeted GPCD

If both of these alternatives result in a lower growth adjustment than the IRP planning goal, no Allocation Surcharge reduction will be made.

²⁰ The base water rate shall be the applicable water rate for the water being purchased. In most cases, it will be the Tier 1 rate (plus Treatment Surcharge for treated water deliveries). However, it is possible that the water being purchased would be in the amount that would put an agency beyond its Tier 1 limit. In that case, the base water rate will be the Tier 2 rate (plus Treatment Surcharge for treated water deliveries).

²¹ Allocation Surcharge is applied to water use in excess of an agency’s WSAP allocation.

²² See Appendix K: Qualifying Income-Based Rate Allocation Surcharge Adjustment Example for specific penalty adjustment formulae and example.

²³ Appropriate documentation and certification will be required.

Tracking and Reporting

Subsequent to a declared regional shortage by the Board of Directors, Metropolitan staff will produce monthly reports of each member agency's water use compared to its allocations based on monthly delivery patterns to be submitted by the member agency. In order to produce these reports, member agencies are requested to submit their local supply use on a monthly basis and certify end of allocation year local supply use. These reports and comparisons are to be used for the purposes of tracking and communicating potential underage/overage of an agency's annual allocations.

Key Dates for Water Supply Allocation Implementation

The timeline for implementation of an allocation is shown in Table 3. A brief description of this timeline follows:

January to March: Water Surplus and Drought Management reporting occurs at Metropolitan's Water Planning and Stewardship Committee meetings. These reports will provide updated information on storage reserve levels and projected supply and demand conditions.

April: Member agencies report their projected local supplies for the coming allocation year. This information is incorporated in staff analysis of storage reserves and projected supply and demand conditions in order to provide an allocation recommendation to the Board.

Metropolitan's Board will consider whether an allocation is needed. A declaration of an allocation will include the level of allocation to be in effect for the allocation year. Likewise, member agencies will report their projected demands and local supplies needed to meet seawater barrier and groundwater replenishment requirements for the allocation year.

Metropolitan's Board will consider whether allocations for seawater barrier demands and groundwater replenishment demands are needed independently from the WSAP allocation decision. **July 1st:** If the Board declared an allocation in April, then it will be effective starting July 1st. The allocation level will be held through June 30th, barring unforeseen circumstances.

Member agencies will now be requested to submit their local supply use on a monthly basis and certify end of allocation year local supply use. Local production data must be reported to Metropolitan by the end of the month following the month of use (use in July must be reported by the end of August). This information will be combined with Metropolitan sales information in order to track retail water use throughout Metropolitan's service area. Each month Metropolitan will report on member agency water sales compared to their allocation amounts.

June 30th: The allocation year is complete.

July: Member agency local supplies must be certified for the month of June, the last month of the previous allocation year.

August: Metropolitan will calculate each member agency's total potable water use based on local supply certifications and actual sales data for the allocation year of July through June. Allocation surcharges will be assessed for usage above a given member agency's final adjusted allocation (reflecting the actual local supply and imported water use that occurred in the allocation year).

Table 3: Board Adopted Allocation Timeline

Year	Month	Year 1 Board Decision	Year 1 Allocation Year	Year 2 Board Decision	Year 2 Allocation Year
Year 1	January	Declaration *	<u>Effective Period</u> Continuous Tracking of Member Agency Local Supply and Imported Water Use	Declaration *	<u>Effective Period</u> Continuous Tracking of Member Agency Local Supply and Imported Water Use
	February				
	March				
	April				
	May				
	June				
	July				
	August				
	September				
	October				
	November				
	December				
Year 2	January	Declaration *	<u>Effective Period</u> Continuous Tracking of Member Agency Local Supply and Imported Water Use	Declaration *	<u>Effective Period</u> Continuous Tracking of Member Agency Local Supply and Imported Water Use
	February				
	March				
	April				
	May				
	June				
	July				
	August				
	September				
	October				
	November				
	December				
Year 3	January	Declaration *	Assess	Declaration *	<u>Effective Period</u> Continuous Tracking of Member Agency Local Supply and Imported Water Use
	February				
	March				
	April				
	May				
	June				

*Member agency projections of local supplies are due on April 1st to assist Metropolitan staff in determining the need for an allocation in the coming allocation year.

Appendix A: Metropolitan Member Agencies

Table 4: Member Agencies		
City of Anaheim	City of Glendale	City of San Marino
City of Beverly Hills	Inland Empire Utilities Agency	City of Santa Ana
City of Burbank	Las Virgenes MWD	City of Santa Monica
Calleguas MWD	City of Long Beach	Three Valleys MWD
Central Basin MWD	City of Los Angeles	City of Torrance
City of Compton	MWD of Orange County	Upper San Gabriel MWD
Eastern MWD	City of Pasadena	West Basin MWD
Foothill MWD	San Diego CWA	Western MWD
City of Fullerton	City of San Fernando	

Source: <http://mwdh2o.com/WhoWeAre/Member-Agencies/>

Appendix B: Water Supply Allocation Plan Process Timeline

July 2007

- City of Long Beach Water Department staff briefing
- Member Agency Managers/Member Agency Workgroup meeting
- Northern Managers Group meeting
 - Foothill MWD, City of Pasadena, City of Long Beach, Calleguas MWD, City of Los Angeles, West Basin MWD, City of Burbank, Three Valleys MWD, City of Glendale, Upper San Gabriel MWD

August 2007

- Central Basin MWD staff briefing
- Eastern MWD staff briefing
- San Diego CWA staff briefing
- Member Agency Managers/Member Agency Workgroup meeting
- Western MWD staff briefing
- City of Beverly Hills staff briefing

September 2007

- Member Agency Subgroup meetings
 - MWD of Orange County, San Diego CWA, West Basin MWD, Central Basin MWD
- MWD of Orange County staff briefing
- Member Agency Workgroup meeting
- Member Agency Workgroup meeting
- MWD Board of Directors Oral Report

October 2007

- Inland Empire Utilities Agency staff briefing
- Central Basin MWD Caucus Meeting (included sub-agencies)
- Three Valleys MWD staff briefing
- MWD of Orange County staff briefing
- West Basin MWD staff briefing
- MWD Board of Directors Oral Report

November 2007

- West Basin MWD Caucus Meeting (included sub-agencies)
- West Basin Water Users Association presentation
- Walnut Valley MWD staff briefing (sub-agency of Three Valleys MWD)
- Foothill MWD Managers Meeting (included sub-agencies)
- Central Basin MWD staff briefing
- City of Claremont City Council (sub-agency of Three Valleys MWD)
- MWD Board of Directors Information Letter with Draft Proposal

December 2007

- Northern Managers Group Meeting
- California Department of Public Health staff briefing
- City of Long Beach Water Department staff briefing
- Santa Ana River Watershed Project Authority presentation
- Foothill MWD Managers Meeting (included sub-agencies)
- MWD Board of Directors Oral Report

January 2008

- Northern Managers Group Meeting
- Water Replenishment District Board of Directors presentation
- Three Valleys MWD staff briefing
- Member Agency Conservation Coordinator's Group presentation
- Member Agency Managers/Member Agency Workgroup meeting
- City of Chino Hills presentation (sub-agency of IEUA)
- Member Agency Workgroup meeting
- Hemet/San Jacinto Exchange Club presentation
- MWD Board of Directors Report with Staff Recommended Water Supply Allocation Plan

February 2008

- MWD of Orange County and Irvine Ranch WD staff briefing
- MWD Board of Directors Action Item
- San Gabriel Valley Water Association Meeting
- Orange County Water Policy Meeting
- SCAG Water Policy Task Force Meeting

Appendix C: 12-Month Review Process and Results

January 2010

- WSAP 12-Month Review Process workshop #1
 - Focused discussion of WSAP issues identified by Metropolitan staff and by member agencies since the July 2009 implementation began.

February 2010

- WSAP 12-Month Review Process workshop #2
 - Continuation of focused discussion
- WSAP 12-Month Review Process workshop #3
 - Continuation of focused discussion

March 2010

- WSAP 12-Month Review Process workshop #4
 - Continuation of focused discussion
- MWD Board of Directors information item
 - Review of potential modifications to the WSAP definition of Extraordinary Supply

April 2010

- WSAP 12-Month Review Process workshop #5
 - Recap of identified issues and discussion of Metropolitan staff proposals for adjustments to the WSAP
- Member Agency Managers Meeting
 - Update on the 12-Month Review Process
- WSAP 12-Month Review Process workshop #6
 - Discussion of WSAP issues related to groundwater replenishment
- Member Agency Managers conference call
 - Clarification of WSAP definition for Extraordinary Supply

May 2010

- Member Agency Managers Meeting
 - Discussion of proposed Extraordinary Supply policy principles and WSAP Local Supply certification process.
- Member Agency Managers conference call
 - Discussion of proposed Extraordinary Supply policy principles

June 2010

- MWD Board of Directors action item

July 2010

- MWD Board of Directors information item
 - Review of proposed adjustments to the WSAP developed in the 12-Month Review Process

August 2010

- MWD Board of Directors action item

Resulting Changes

- Removed references to Gains and Losses of Local Supply
 - Removed references in the WSAP to “gains and losses of local supplies” in order to better facilitate the accounting of historical base year and allocation year local supplies. This change did not affect the WSAP formula or allocations.
- Removed references to the Regional Shortage Percentage
 - Removed references to the “Regional Shortage Percentage” in the WSAP to reduce unintended confusion between calculation factors and shortage amounts. This change did not affect the WSAP formula or allocations.
- Included the Retail Impact Adjustment in all shortage levels
 - Included the Retail Impact Adjustment for Regional Shortage Levels 1 and 2. This change results in additional allocations to Metropolitan-dependent agencies under Level 1 and Level 2 regional shortages.
- Revised the accounting of Extraordinary Supplies
 - Revised the methodology for accounting of Extraordinary Supply in the WSAP formula by:
 - Removing the Base Period Local Supply threshold provision,
 - Removing the sliding-scale sharing mechanism from the formula, and
 - Including the full amount of the Extraordinary Supply in the calculation of the Retail Impact Adjustment.
- Included a Minimum Per Capita Water Use Threshold
 - Developed a minimum water use credit based on two GPCD water use thresholds. Member agencies would receive additional Metropolitan allocation for an acre-foot equivalent of GPCD below the minimum threshold. Member agency water use, on a gallon per capita per day (GPCD) basis, is compared to the following minimum thresholds established under Senate Bill X7-7 (Water Conservation Act of 2009)
 - 100 GPCD total use or
 - 55 GPCD residential indoor use
- Excluded Seawater Barrier from the WSAP Formula
 - Excluded seawater barrier supplies from the WSAP Base Period and Allocation Year local supply calculations. This allows the Board to determine allocations for seawater barrier demands separately from the WSAP.

Appendix D: Three-Year Review Process and Results

February 2011

- WSAP 3-Year Review Process workshop #1
 - Review of the existing WSAP policy formula; review of the process timeline; and focused discussion of WSAP issues identified by Metropolitan staff and by member agencies since the WSAP's adoption in February 2008

March 2011

- WSAP 3-Year Review Process workshop #2
 - Discussion of issues related to local supplies and baseline inflation due to adjustments for recycling in the WSAP formula
- WSAP 3-Year Review Process workshop #3
 - Continuation of prior workshop

April 2011

- WSAP 3-Year Review Process workshop #4
 - Discussion of issues and alternatives related to base period selection and baseline inflation in the WSAP formula
- WSAP 3-Year Review Process workshop #5
 - Discussion of recommendations to address baseline inflation in the WSAP formula

May 2011

- WSAP 3-Year Review Process workshop #6
 - Discussion of issues and alternatives for the growth adjustment methodology in the WSAP formula
- WSAP 3-Year Review Process workshop #7
 - Continuation of prior workshop

June 2011

- WSAP 3-Year Review Process workshop #8
 - Continuation of prior workshop, discussion of WSAP implementation exit strategy
- WSAP 3-Year Review Process workshop #9
 - Continuation of exit strategy discussion, discussion of baseline inflation due to conservation and related conservation demand hardening issues

July 2011

- WSAP 3-Year Review Process workshop #9
 - Continued discussion of baseline inflation and conservation issues, and discussion of sharing allocations between agencies with common local resources

August 2011

- WSAP 3-Year Review Process workshop #10
 - Discussion of WSAP Allocation Year timing vs. Tier 1-Tier 2 rate cycle timing, discussion of approaches for encouraging completion of WSAP local supply certifications
- Review WSAP at Member Agency Managers Meeting
 - Discussion of proposed WSAP adjustments to address baseline inflation issues, revise the growth adjustment methodology, and establish a WSAP exit strategy

September 2011

- MWD Board of Directors action item

Resulting Changes

- Baseline Inflation Adjustment
 - Removed non-potable recycling and conservation from the WSAP baseline
 - Increases in recycling and conservation will be subtracted annually from the Base Period forward
 - The annual population growth rate will be applied after deducting the annual increases in recycling and conservation
 - If an agency ends up in allocation penalty, a penalty reduction will be applied in an amount equal to the Code-Based and rate Structure conservation savings that were removed from the WSAP baseline
- Changed the Growth Adjustment methodology
 - Growth will be allocated at historical per capita rate capped at the 2010 Integrated Water Resource Plan (IRP) Target for Water Use Efficiency
 - For years up to and including 2014, the cap will be 163 GPCD
 - For years 2015-2020, the cap will reduce linearly from 163 to 145 GPCD
 - If an agency exceeds its allocation, a penalty reduction will be applied based on either:
 - The differential Evapotranspiration (ETo) of its service area compared to the MWD average, or
 - Certified and documented 20 x 2020 targeted GPCD
- Exit Strategy
 - Clarified the course of action for an existing WSAP allocation when Metropolitan's Board makes a declaration decision for the following WSAP year
 - If there is an allocation for the next year, then the current allocation stays in place
 - If there is no allocation for the next year, then the current allocation is lifted concurrent with the April decision

Appendix E: 2014 Review Process and Results

July 2014

- WSAP Workgroup Meeting #1
 - First meeting of the 2014 WSAP Review process; review of the existing WSAP policy and formula; review of the process timeline; began discussion of issues related to base period selection
- WSAP Workgroup Meeting #2
 - Discussion of base period selection

August 2014

- WSAP Workgroup Meeting #3
 - Continuation of prior workshop discussion; comparison of base period alternatives

September 2014

- WSAP Workgroup Meeting #4
 - Discussion of a base period proposal; discussion of replenishment issues in the WSAP; discussion of 2015 water supply scenarios
- Review WSAP at Member Agency Managers Meeting
 - Review of WSAP workgroup process; discussion on issues related to base period, demand hardening, and local resources development
- WSAP Workgroup Meeting #5
 - Review of base period recommendation; discussion of issues regarding agencies in mandatory conservation during a base period; discussion on replenishment in the WSAP

October 2014

- WSAP Workgroup Meeting #6
 - Continuation of prior workshop discussion; discussion of alternative methods for conservation demand hardening credit; discussion of new and existing local supplies
- Review WSAP at Member Agency Managers Meeting
 - Review of WSAP workgroup process; discussion of issues related to base period and demand hardening

November 2014

- WSAP Workgroup Meeting #7
 - Review and discussion of issues and potential methods for base period selection and adjustment, replenishment allocation, and conservation demand hardening credit; review of estimated effects of potential WSAP changes at the regional level
- WSAP Workgroup Meeting #8
 - Review of proposed recommendations for the WSAP based on workgroup discussion
- Review WSAP at Member Agency Managers Meeting
 - Review of proposed recommendations for the WSAP based on workgroup discussion

Resulting Changes

- Base Period Update to FY2013 and FY2014
 - Changed the WSAP Base Period from calendar years 2004-2006 to fiscal years ending July 2013 and 2014
 - Mandatory Conservation Adjustment
 - Agencies with mandatory conservation in effect during the base period (FY 2013 and/or FY 2014) may qualify for a demand hardening adjustment, adjustment is subject to a consultation process that includes consideration historical demand and GPCD information
- Modify Conservation Demand Hardening Credit
 - Replaced device calculation-based estimates of conservation savings with a GPCD-based method
 - Conservation savings are calculated by comparing GPCD from a historical baseline to the Allocation Year; the difference is converted to acre-feet using the Allocation Year population.
 - Baseline GCPD is 10-year average ending between 2004 and 2010, with gross water, using gross water use minus non-potable recycled water production and documented historical population
 - Replaced formula for calculating the credit for each Regional Shortage Level
 - Conservation Demand hardening credit will be based on an initial 10 percent of GPCD-based conservation savings plus an additional 5 percent for each level of Regional Shortage; the credit will also be adjusted for the overall percentage reduction in retail water demand and the member agency's dependence on Metropolitan.
- Allocation Surcharge
 - Replaced the WSAP Penalty Rate with an Allocation Surcharge based on the estimated cost of Turf Replacement conservation programs

Appendix F: Summary of Historical Shortage Plans

These five elements incorporated into the WSAP have, in four out of five instances, been used in previous shortage plans. Both the IICP and the 1995 DMP used a historical base period calculation, adjusted for growth, made local supply adjustments, and used conservation hardening credits in their formulations. The retail impact adjustment is the only feature of the WSAP that has not been used historically.

Table 5: Historical Shortage Plan Overview			
Plan Element	1991 IICP	1995 DMP	WSAP
Historical Base Period	√	√	√
Growth Adjustment	√	√	√
Local Supply Adjustment	√	√	√
Conservation Hardening Credit	√	√	√
Retail Impact Adjustment			√

Appendix G: Water Supply Allocation Formula Example

The following example gives a step-by-step description of how the formula would be used to calculate an allocation of Metropolitan supplies for a hypothetical member agency. All numbers are hypothetical for the purpose of the example and do not reflect any specific member agency.

Step 1: Calculate Base Period Retail Demand

Base Period Local Supplies: Calculated using a two-year average of groundwater (gw), groundwater recovery (gwr), Los Angeles Aqueduct supply (laa), surface water (sw), seawater desalination (sd), and other non-Metropolitan imported supplies (os). For the purpose of this example, assume that the two year average is 59,000 af.

$$[(gw1+gwr1+laa1+sw1+sd1+os1) + (gw2+gwr2+laa2+sw2+sd2+os2)] \div 2 = 59,000 \text{ af}$$

Base Period Wholesale Demands: Calculated using the same two-year time period as the Base Period Local Supplies. The Base Period Wholesale Demands include firm purchases (fp) and in-lieu deliveries to long-term groundwater replenishment (il), conjunctive use (cup), cyclic (cyc), and supplemental storage programs (ss). For the purpose of this example, assume that the two year average is 69,000 af.

$$[(fp^1+il^1+cup^1+cyc^1+ss^1) + (fp^2+il^2+cup^2+cyc^2+ss^2)] \div 2 = 69,000 \text{ af}$$

Base Period Retail Demands: Calculated as the sum of the Base Period Local Supplies and Base Period Wholesale Demand.

$$59,000 + 69,000 = 128,000 \text{ af}$$

Figure 1: Base Period Retail Demand Calculation



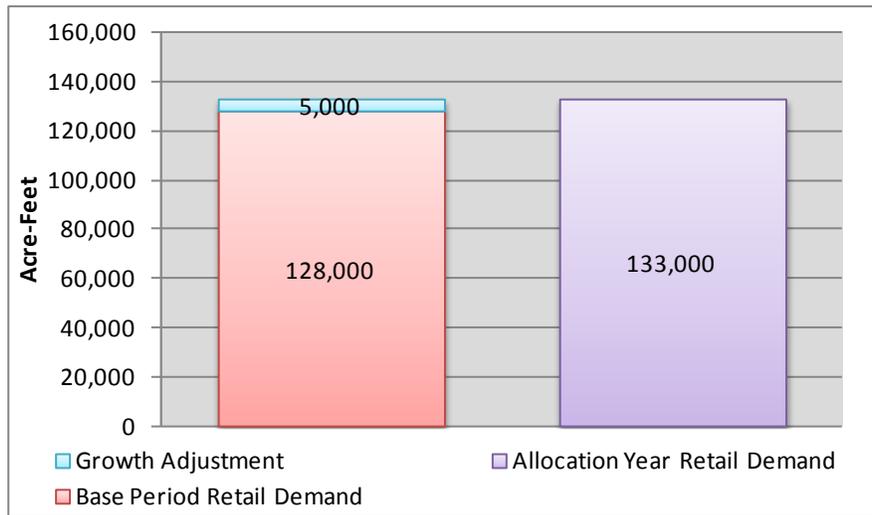
Calculate Adjustment for Base Period Mandatory Rationing (if applicable): The hypothetical agency used in this example is assumed not to qualify for the Base Period Mandatory Rationing Adjustment. A detailed discussion of the adjustment methodology can be found in [Appendix I: Base Period Rationing Adjustment Example](#).

Step 2: Calculate Allocation Year Retail Demand

Allocation Year Retail Demand: Calculated by adjusting the Base Period Retail Demand for any baseline inflation and growth that occurred since the Base Period.

$$128,000 \text{ af} + 5,000 \text{ af (net adjustment to retail demand)} = 133,000 \text{ af}$$

Figure 2: Allocation Year Retail Demand Calculation



Step 3: Calculate Allocation Year Wholesale Demand

Allocation Year Local Supplies: Estimates of Allocation Year Local Supplies are provided by the member agencies upon implementation of a WSAP. If estimates are not provided, Metropolitan will use the sum of the Base Period Local Supplies and Base Period In-Lieu Deliveries as a default. Agencies may provide updated estimates at any time during the Allocation Year to more accurately reflect their demand for Metropolitan supplies. For this example assume that the Allocation Year Local Supplies total 65,000 acre-feet.

$$\text{Allocation Year Local Supplies} = 65,000 \text{ af}$$

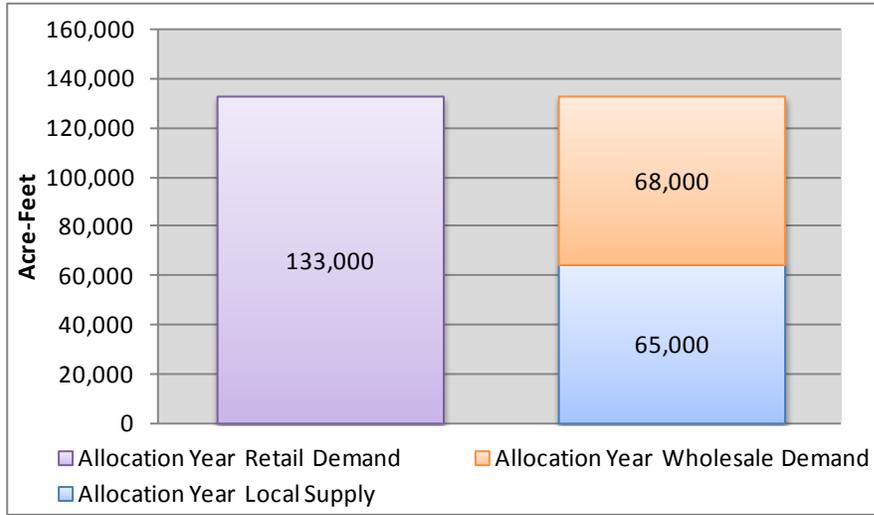
For this example assume also that this agency has an additional 5,000 acre-feet of supplies that meet the determinations for Extraordinary Supply. These supplies are withheld from the allocation formula except for in calculating the Retail Impact Adjustment Allocation.

$$\text{Extraordinary Local Supplies} = 5,000 \text{ af}$$

Allocation Year Wholesale Demands: Calculated by subtracting the Allocation Year Local Supplies (65,000 af) from the Allocation Year Retail Demands (133,000 af).

$$133,000 \text{ af} - 65,000 \text{ af} = 68,000 \text{ af}$$

Figure 3: Allocation Year Wholesale Demand Calculation



Step 4: Calculate the Wholesale Minimum Allocation

Wholesale Minimum Percentage: Calculate from Table 1 for Regional Shortage Level 4.

Table 1: Shortage Allocation Index		
(a) Regional Shortage Level	(b) Wholesale Minimum Percentage	(c) Maximum Retail Impact Adjustment Percentage
4	70.0%	10.0%

Wholesale Minimum Allocation: Calculated by multiplying the agency’s Allocation Year Wholesale Demand (68,000 af) by the Wholesale Minimum Percentage (70%) from the Table 1 for Regional Shortage Level 4.

$$68,000 \text{ af} * 70\% = 47,600 \text{ af}$$

Step 5: Calculate the Retail Impact Adjustment Allocation

Maximum Retail Impact Adjustment Percentage: Calculate from Table 1 for Regional Shortage Level 4.

Retail Impact Adjustment Allocation: Calculated first by determining the agency’s dependence on Metropolitan by dividing the Allocation Year Wholesale Demand (68,000 af) minus the Extraordinary Supply (5,000 af) by the Allocation Year Retail Demand (133,000 af) and multiplying by 100.

$$[(68,000 \text{ af} - 5,000 \text{ af}) / 133,000 \text{ af}] * 100 = 47\%$$

Next, this percentage dependence on Metropolitan (47%) is multiplied by the Maximum Retail Impact Percentage for Shortage Level 4 (10%).

$$47\% * 10\% = 4.7\%$$

This percentage is now multiplied by the Allocation Year Wholesale Demand (68,000 af) for the Retail Impact Adjustment Allocation.

$$68,000 \text{ af} * 4.7\% = 3,221 \text{ af}$$

Step 7: Calculate the Conservation Demand Hardening Adjustment

Calculate Baseline GPCD: To estimate conservation savings, each member agency will establish a historical baseline GPCD calculated in a manner consistent with California Senate Bill SBx7-7, using a 10 or 15-year average ending between 2004 and 2010, using gross water use minus non-potable recycle water production and documented historical population. For this example assume that the Baseline GPCD is 154 GPCD

$$\text{Baseline GPCD} = 154 \text{ GPCD}$$

Calculate Allocation Year GPCD: Next, calculate the allocation year GPCD by converting the Allocation Year Retail Demand to GPCD and dividing by the Allocation Year Population from the WSAP. For this example the Allocation Year Retail Demand is 133,000 AF (see Step 2 above) and assume the Allocation Year Population is 905,000 persons. The resulting GPCD is 131 GPCD.

$$\text{Allocation Year GPCD} = 133,000 \text{ af/year} * 325,851 \text{ gallons/af} \div 365 \text{ days/year} \div 905,000 \text{ persons} = 131 \text{ GPCD}$$

Calculate Reduction in GPCD: Subtract Allocation Year GPCD from Baseline GPCD to determine the GPCD Reduction.

$$\text{GPCD Reduction} = 154 \text{ GPCD} - 131 \text{ GPCD} = 23 \text{ GPCD}$$

Calculate Conservation Savings: Convert the GPCD Reduction to the equivalent annual conservation savings in acre-feet, using the Allocation Year Population.

$$\text{Conservation Savings} = \frac{((\text{GPCD Reduction}) \times 365 \text{ days/yr} \times \text{Population})}{325,851 \text{ gallons/af}}$$

$$\text{Conservation Savings} = 23 \times 365 \times 905,000 \div 325,851 = 23,316 \text{ af}$$

Multiply by Regional Shortage Level Percentage: Multiply the Conservation Savings by 10 percent plus an additional 5 percent for each level of Regional Shortage (see Step 4 above). This example assumes a Regional Shortage Level of 4. This scales the hardening credit by the level of regional shortage, thereby increasing the credit as deeper shortages occur when demand hardening has a larger impact on the retail consumer.

$$23,316 \text{ af} \times (10\% + (4 \times 5\%)) = 6,995 \text{ af}$$

Multiply by Conservation Savings Percentage: Next, multiply by the percentage of an agency's demand that was reduced through conservation. This scales the hardening by the total percentage reduction to recognize that increased hardening occurs as increasing amounts of conservation are implemented.

$$\text{Conservation Savings Percentage} = 1 + ((\text{Baseline GPCD} - \text{Allocation Year GPCD})/\text{Baseline GPCD})$$

$$\text{Conservation Savings Percentage} = 1 + ((154 \text{ GPCD} - 131 \text{ GPCD})/154 \text{ GPCD}) = 115\%$$

$$6,995 \text{ af} \times 115\% = 8,044 \text{ af}$$

Multiply by Dependence on MWD: Next, multiply by the agency's percentage dependence on MWD as shown in Step 5 above. This scales the credit to the member agency's dependence on MWD to ensure that credits are being applied to the proportion of water demand that is being affected by reductions in MWD's supply. For this example, dependence on MWD is 47%.

$$8,044 \text{ af} \times 47\% = 3,781 \text{ af}$$

Summary: The Conservation Demand Hardening Adjustment calculation is summarized by the following formula:

$$\text{Conservation Demand Hardening Adjustment} = \text{Conservation Savings} \times (10\% + \text{Regional Shortage Level \%}) \times (1 + \text{Conservation\%}) \times \text{Dependence on MWD \%}$$

$$\text{Conservation Demand Hardening Adjustment} = 23,316 \text{ af} \times (10\% + (4 \times 5\%)) \times (115\%) \times (47\%) \\ = 3,781 \text{ af}$$

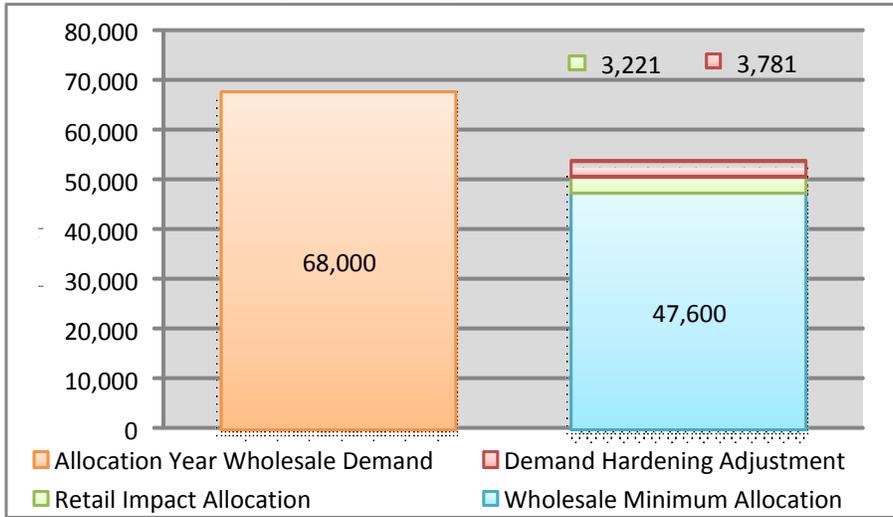
Step 8: Calculate the Low Per-Capita Adjustment Allocation: The hypothetical agency used in this example is assumed not to qualify for the Low Per-Capita Adjustment. A detailed discussion and example of the Low Per-Capita Adjustment calculation can be found in [Appendix J: Per Capita Water Use Minimum Example](#).

Step 9: Calculate the total WSAP Allocation

WSAP Allocation: Calculated by adding the Wholesale Minimum Allocation (47,600 af), the Maximum Retail Impact Adjustment (3,221 af), the Demand Hardening Adjustment (3,781 af), and the Low Per-Capita Adjustment (0 af).

$$47,600 \text{ af} + 3,221 \text{ af} + 3,781 \text{ af} + 0 \text{ af} = 54,602 \text{ af}$$

Figure 4: WSAP Allocation Regional Shortage Level 4



Step 10: Calculate total retail level reliability

Retail level reliability: Calculated by adding the WSAP Allocation (54,602 af), the Allocation Year Local Supply (65,000 af) and the Extraordinary Local Supply (5,000 af) and dividing by the Allocation Year Retail Demand (133,000 af).

$$(54,602 \text{ af} + 65,000 \text{ af} + 5,000 \text{ af}) \div 133,000 \text{ af} = 93.7\%$$

Total Metropolitan Supply Allocations: In addition to the WSAP Allocation described above, agencies may also receive separate allocations of supplies for groundwater replenishment and seawater barrier demands. More information on the groundwater replenishment allocation is located in [Appendix L: Groundwater Replenishment Allocation](#).

Appendix H: Board Policy Principles on Determining the Status of Extraordinary Supply

At the June 8, 2010 Water Planning and Stewardship Committee meeting Metropolitan's Board of Directors adopted the following policy principles to guide staff in determining the Extraordinary Supply status of future member agency supply programs.

No Negative Impacts to Other Member Agencies

A potential Extraordinary Supply for a member agency should not decrease the amount of Metropolitan water supply that would be available to the other member agencies in a WSAP. Programs that utilize Metropolitan supplies as a primary or in-lieu source or as a means of payback or future replenishment may have the effect of decreasing supplies, available to other agencies, if designated as Extraordinary Supply.

Provides Supply in Addition to Existing Regional Supplies

A potential Extraordinary Supply should provide a water supply that increases the overall water supplies that are available to the region in a WSAP. A program that is designed to move existing regional supplies from year to year would not qualify.

Specifically Designed Program or Supply Action

A potential Extraordinary Supply must be intentionally created and operated to provide additional supply yield. Normal variations in existing and planned local supply programs would not qualify.

Intended for Consumptive Use in a WSAP

A potential Extraordinary Supply should be designed with the primary intention to deliver water supply to a member agency only at a time when Metropolitan is allocating supplies. Programs designed to deliver water on a regular basis would not qualify. Exceptions for reasonable use of a supply program for emergency or other extenuating local circumstances should be considered.

Fully Documented Resource Management Actions

A potential Extraordinary Supply should have a full description as to the source, transmission, distribution, storage, and delivery of the water supply.

These principles are intended to identify deliberate actions taken by member agencies to augment supplies only when Metropolitan is allocating supplies through the WSAP. Production from existing local supplies, programs that are operated on an ongoing basis, and incidental increases in water supply would not qualify as Extraordinary Supply. The intent of the Extraordinary Supply designation is to recognize programs and actions that are additive to the total regional water supply as the region continues to confront the water supply challenges from drought and regulatory conditions. To that end, any supply actions taken after the initial implementation of the WSAP in July 2009 that utilize Metropolitan supplies either as a primary source, or to refill or replenish an incurred obligation or deficit at a future date would not qualify as Extraordinary Supply.

Appendix I: Base Period Mandatory Rationing Adjustment

Agencies that were under mandatory water use restrictions during the Base Period may have water use that is lower due to the mandatory actions already taken. Without adjusting for this, those agencies could be required to enforce even higher levels of restrictions under an allocation than those agencies that had not started mandatory restrictions.

To qualify for a Base Period Mandatory Rationing Adjustment, the member agency must provide Metropolitan staff with the following information:

- Time period when the mandatory conservation was in effect; it must be in effect during the Base Period
- A statement, with documentation, of how drought restrictions comply with the following Mandatory Conservation qualifications:
 - Governing Body-authorized or enacted
 - Includes mandatory demand reduction actions, restrictions or usage limitations including penalty-backed water budgets
 - Enforced by assessing penalties, fines, or rates based upon violating restrictions or exceeding usage limitations
- If the agency in question is a retail subagency, then the retailer's base period water demands during the Base Period in order to determine proportion to the member agency's total demand
- Historical data to construct GPCD base and trend for the consultation

Calculating the Base Period Rationing Adjustment involves following steps:

- Use the Baseline GPCD 10 or 15-year period selected by member agency for the Conservation Demand Hardening Adjustment calculation.
- Interpolate from the GPCD value of the midpoint of the Baseline GPCD period to the average GPCD of the two years preceding the agency's mandatory conservation
- Extrapolate to the WSAP Base Period (FY2013 and FY2014)
- Calculate the difference between estimated and observed GPCD for FY2013 and FY2014
- Convert to Acre-Feet and add to the member agency's Base Period Retail Demands

Appendix J: Per-Capita Water Use Minimum Example

This adjustment creates a minimum per capita water use threshold. Member agencies' retail-level water use under the WSAP is compared to two different thresholds. The minimum water use levels are based on compliance guidelines for total and residential water use established under Senate Bill X7-7.

Total Retail Level Use: 100 GPCD

Residential Retail Level Use: 55 GPCD

Agencies that fall below either threshold under the WSAP would receive additional allocation from Metropolitan to bring them up to the minimum GPCD water use level. To qualify for this credit, member agencies must provide documentation of the total agency level population and the percent of retail level demands that are residential; no appeal is necessary.

The following example gives a step-by-step description of how the Low Per-Capita Water Use Adjustment would be calculated for a hypothetical member agency. All numbers are hypothetical for the purpose of the example and do not reflect any specific member agency. This example was calculated using the following assumptions:

Allocation Year Retail Demand: 50,000 acre-feet

Allocation Year Local Supplies: 25,000 acre-feet;

Allocation Year Wholesale Demand: 25,000 acre-feet

Base Period Conservation: 5,000 acre-feet

Agency Population: 375,000

Percent of Retail Demands that are Residential: 60%

Step 1: Calculate Total Retail-Level Allocation Year Supplies

Table 6 shows the Allocation Year Local Supply, WSAP Allocation, and the total Allocation Year Supplies for the example agency at each Regional Shortage Level. The WSAP Allocation was calculated using the methodology detailed in [Appendix G: Water Supply Allocation Formula Example](#) and the assumptions listed above.

Table 6: Total Retail Level Allocation Year Supplies			
Regional Shortage Level	Allocation Year Local Supply	WSAP Allocation	Total Allocation Year Supply
1	25,000	23,594	48,594
2	25,000	22,188	47,188
3	25,000	20,781	45,781
4	25,000	19,375	44,375
5	25,000	17,969	42,969
6	25,000	16,563	41,563
7	25,000	15,156	40,156
8	25,000	13,750	38,750
9	25,000	12,344	37,344
10	25,000	10,938	35,938

Step 2: Calculate the Equivalent Total and Residential GPCD

The next step is to calculate the equivalent water use in gallons per capita per day (GPCD) for the Total Allocation Year Supply. The following equation shows the GPCD calculation under Regional Shortage Level 10.

$$35,938 \text{ af} * 325,851 \text{ gallons} \div 375,000 \text{ people} \div 365 \text{ days} = 85.6 \text{ GPCD}$$

The residential per-capita water use is calculated in the same manner. Based on the assumption that 60% of the agency demands are residential, the following equation shows the residential GPCD calculation under Regional Shortage Level 10.

$$35,938 \text{ af} * 60\% * 325,851 \text{ gallons} \div 375,000 \text{ people} \div 365 \text{ days} = 51.3 \text{ GPCD}$$

Step 3: Compare the Total and Residential GPCD to the Minimum Water Use Thresholds

The next step is to compare the total GPCD water use to the 100 GPCD total water use threshold. In a Regional Shortage Level 10, the WSAP results in an allocation that is 14.4 GPCD below the minimum threshold.

$$100 \text{ GPCD} - 85.6 \text{ GPCD} = 14.4 \text{ GPCD}$$

Likewise the residential GPCD water use is compared to the 55 GPCD residential water use threshold.

$$55 \text{ GPCD} - 51.3 \text{ GPCD} = 3.7 \text{ GPCD}$$

Step 4: Determine the Allocation Adjustment in Acre-Feet

The final step is to calculate the acre-foot equivalent of the GPCD that fell below the minimum threshold. In a Regional Shortage Level 10, the adjustment provides 6,068 acre-feet of additional allocation to the agency; the results for Shortage Levels 1-10 are shown in Table 7.

$$14.4 \text{ GPCD} \div 325,851 \text{ gallons} * 375,000 \text{ people} * 365 \text{ days} = 6,068 \text{ acre-feet}$$

Table 7: Total Per-Capita Water Use Adjustment				
Regional Shortage Level	Allocation Year Supply	Equivalent GPCD	GPCD Below Threshold	Allocation Adjustment
1	48,594	115.7	0	0
2	47,188	112.3	0	0
3	45,781	109.0	0	0
4	44,375	105.6	0	0
5	42,969	102.3	0	0
6	41,563	98.9	1.1	443
7	40,156	95.6	4.4	1,849
8	38,750	92.3	7.7	3,255
9	37,344	88.9	11.1	4,662
10	35,938	85.6	14.4	6,068

Again, this step is repeated for the residential water use. In a Regional Shortage Level 10, the adjustment provides 1,540 acre-feet of additional allocation to the agency; the residential water use results for Regional Shortage Levels 1-10 are shown in Table 8.

$$3.7 \text{ GPCD} \div 325,851 \text{ gallons} * 375,000 \text{ people} * 365 \text{ days} = 1,540 \text{ acre-feet}$$

Table 8: Residential Per-Capita Water Use Adjustment				
Regional Shortage Level	Allocation Year Supply	Equivalent GPCD	GPCD Below Threshold	Allocation Adjustment
1	29,156	69.4	0	0
2	28,313	67.4	0	0
3	27,469	65.4	0	0
4	26,625	63.4	0	0
5	25,781	61.4	0	0
6	24,938	59.4	0	0
7	24,094	57.4	0	0
8	23,250	55.4	0	0
9	22,406	53.3	1.7	697
10	21,563	51.3	3.7	1,540

Agencies that fall below either threshold under the WSAP would receive additional allocation from Metropolitan to bring them up to the minimum GPCD water use level. If an agency qualifies under both thresholds, the one resulting in the maximum allocation adjustment would be given. Under this example the agency would receive 6,068 acre-feet of additional allocation in a Regional Shortage Level 10.

Appendix K: Qualifying Income-Based Rate Allocation Surcharge Adjustment Example

The following example provides a step by step description of how the qualifying income-based rate allocation surcharge adjustment is calculated. To qualify for this adjustment, member agencies must provide documentation showing the amount of retail demands that are covered by a qualifying income-based rate; no appeal is necessary.

The following list summarizes the allocation year demands, local supplies, and allocation as calculated in [Appendix G: Water Supply Allocation Formula Example](#) for a hypothetical agency under a Level 4 Regional Shortage. For detailed instructions on how to calculate these figures, reference [Appendix G: Water Supply Allocation Formula Example](#).

Allocation Year Retail Demand: 133,000 acre-feet

Allocation Year Local Supplies: 68,000 acre-feet;

Level 4 WSAP Allocation: 52,735 acre-feet

Step 1: Allocation Surcharge Calculation

- (a) **Water Use above Allocation:** The first step in calculating the income-based rate Allocation Surcharge adjustment is to calculate the agency's total Allocation Surcharge under the WSAP. If the agency did not incur any Allocation Surcharge from the allocation year, the income-based rate allocation surcharge adjustment would not apply. For the purpose of this example, the agency used 61,000 acre-feet of MWD supplies in the allocation year. This represents 8,265 acre-feet of use above the water supply allocation.

WSAP Allocation	52,735 af
Actual MWD Water Use	61,000 af
Use Above WSAP Allocation	8,265 af

- (b) **Total Allocation Surcharge:** In this example the agency used 115.7% of its water supply allocation. 7,910 of the 8,265 acre-feet of use above the allocation would be assessed the Allocation Surcharge at an amount of \$1,480 per acre-foot and 354 of the 8,265 acre-feet of use above the allocation would be assessed the Allocation Surcharge at an amount of \$2,960.

Between 100% and 115% of Allocation	7,910 af	\$1,480/af	\$11,706,800
Greater than 115% of Allocation	354 af	\$2,960/af	\$1,047,840
Total	8,265 af		\$12,754,640

Step 2: Effective Income-Based Rate Cutback

- (a) **Calculate Retail Cutback:** The second step in calculating the income-based rate allocation surcharge adjustment is to calculate the amount of supply cutback that would have been expected from qualifying income-based rate customers under the WSAP. Using the water supply allocation that was calculated above, the total retail level impact on the agency can be

determined. In this example the agency receives a retail level cutback of 15,265 acre-feet, or 11.5% of their retail level demand.

WSAP Allocation + Allocation Year Local Supplies	117,735 af
Allocation Year Retail Demand	133,000 af
Effective Cutback	15,265 af (11.5%)

(b) Income-based Rate Customer Retail Cutback: To calculate the effective income-based rate cutback, the amount of demand covered by a qualifying income-based rate is multiplied by the effective retail level cutback. For this example assume that the agency has 10,000 acre-feet of qualifying demands.

Qualifying Income-Based Rate Demand	10,000 af
Effective Cutback Percentage	11.5%
Effective Income-Based Rate Cutback	1,148 af

(c) Income-based Rate Cutback Allocation Surcharge: Once the effective cutback has been calculated, the amount of Allocation Surcharge that is associated with qualifying income-based rate customers can be determined.

Between 100% and 115% of Allocation	794 af	\$1,480/af	\$1,175,120
Greater than 115% of Allocation	354 af	\$2,960/af	\$1,047,840
Total	1,148 af		\$2,222,960

(d) Adjusted Allocation Surcharge Calculation: Finally, the Allocation Surcharge attributable to qualifying income-based rate customers is subtracted from the total Allocation Surcharge that was calculated above to determine the qualifying income-based rate adjusted allocation surcharge. In the case that the monetary amounts associated with the Income-Based Rate are greater than the total amounts an agency incurs, no Allocation Surcharge will be incurred.

Total Allocation Surcharge	\$12,754,640
Qualifying Income-Based Rate Allocation Surcharge	\$2,222,960
Qualifying Income-Based Rate Adjusted Allocation	\$10,531,680

Appendix L: Groundwater Replenishment Allocation

Groundwater basins help provide vital local supplies that can buffer the region from short-term drought impacts. Longer droughts can result in reductions to the many sources of water that replenish groundwater basins, resulting in lower basin levels and potential impacts to the overlying consumptive demands. Limited imported deliveries under these conditions may help avoid impacts to the basins that may be drawn out of their normal operating range or subject to water quality or regulatory impacts. To this end, Metropolitan provides a limited allocation for drought impacted groundwater basins based on the following framework:

- a) Staff hold a consultation with qualifying member agencies who have taken groundwater replenishment deliveries since 2010 and the appropriate groundwater basin managers to document whether their basins are in one of the following conditions:
 - i. Groundwater basin overdraft conditions that will result in water levels being outside normal operating ranges during the WSAP allocation period; or
 - ii. Violations of groundwater basin water quality and/or regulatory parameters that would occur without imported deliveries.
- b) Provide an allocation based on the verified need for groundwater replenishment. The allocation would start with a member agency's ten-year average purchases of imported groundwater replenishment supplies (excluding years in which deliveries were curtailed). The amount would then be reduced by the declared WSAP Regional Shortage Level (5 percent for each Regional Shortage Level).
- c) Any allocation provided under this provision for drought impacted groundwater basins is intended to help support and maintain groundwater production for consumptive use. As such, a member agency receiving an allocation under this provision will be expected to maintain groundwater production levels equivalent to the average pumping in the Base Period. Any adjustments to a member agency's M&I allocation due to lower groundwater production would be reduced by deliveries made under this provision.
- d) Agencies for which this allocation does not provide sufficient supplies for the needs of the groundwater basin may use the WSAP Appeals Process to request additional supply (subject to Board approval). The appeal should include a Groundwater Management Plan that documents the need for additional supplies according to the following tenets:
 - i. Maintenance of groundwater production levels;
 - ii. Maintenance of, or reducing the further decline of, groundwater levels;
 - iii. Maintenance of key water quality factors/indicators;
 - iv. Avoidance of permanent impacts to groundwater infrastructure or geologic features; and
 - v. Consideration of severe and/or inequitable financial impacts.

Final amounts and allocations will be determined following the consultations with groundwater basin managers and member agencies.

Appendix M: Water Rates, Charges, and Definitions

Table 9: Water Rates and Charges Dollars per acre-foot (except where noted)			
Rate	Effective 1/1/2014	Effective 1/1/2015	Effective 1/1/2016
Tier 1 Supply Rate	\$148	\$158	\$156
Tier 2 Supply Rate	\$290	\$290	\$290
System Access Rate	\$243	\$257	\$259
Water Stewardship Rate	\$41	\$41	\$41
System Power Rate	161	\$126	\$138
Tier 1	\$593	\$582	\$594
Tier 2	\$735	\$714	\$728
Treatment Surcharge	\$297	\$341	\$348
Full Service Treated Volumetric Cost			
Tier 1	\$890	\$923	\$942
Tier 2	\$1,032	\$1,055	\$1,076
Readiness-to-Serve Charge (millions of dollars)	\$166	\$158	\$153
Capacity Charge (dollars per cubic foot second)	\$8,600	\$11,100	\$10,900

Definitions:

- (1) **Tier 1 Supply Rate** - recovers the cost of maintaining a reliable amount of supply.
- (2) **Tier 2 Supply Rate** - set at Metropolitan's cost of developing additional supply to encourage efficient use of local resources.
- (3) **System Access Rate** – recovers a portion of the costs associated with the delivery of supplies.
- (4) **System Power Rate** – recovers Metropolitan’s power costs for pumping supplies to Southern California.
- (5) **Water Stewardship Rate** – recovers the cost of Metropolitan’s financial commitment to conservation, water recycling, groundwater clean-up and other local resource management programs.
- (6) **Treatment Surcharge** – recovers the costs of treating imported water.
- (7) **Readiness-to-Serve Charge** - a fixed charge that recovers the cost of the portion of system capacity that is on standby to provide emergency service and operational flexibility.
- (8) **Capacity Charge** – the capacity charge recovers the cost of providing peak capacity within the distribution system.

Source: <http://www.mwdh2o.com/WhoWeAre/Management/Financial-Information>

Appendix N: Allocation Appeals Process

Step 1: Appeals Submittal

All appeals shall be submitted to the Appeals Liaison in the form of a written letter signed by the member agency General Manager. Each appeal must be submitted as a separate request, submittals with more than one appeal will not be considered. The appeal request is to include:

- A designated member agency staff person to serve as point of contact.
- The type of appeal (erroneous baseline data, loss of local supply, etc.).
- The quantity (in acre-feet) of the appeal.
- A justification for the appeal which includes supporting documentation.

A minimum of 60 days are required to coordinate the appeals process with Metropolitan's Board process.

Step 2: Notification of Response and Start of Appeals Process

The Appeals Liaison will phone the designated member agency staff contact within 3 business days of receiving the appeal to provide an initial receipt notification, and schedule an appeals conference. Subsequent to the phone call, the Liaison will send an e-mail to the Agency General Manager and designated staff contact documenting the conversation. An official notification letter confirming both receipt of the appeal submittal, and the date of the appeals conference, will be mailed within 2 business days following the phone contact

Step 3: Appeals Conference

All practical efforts will be made to hold an appeals conference between Metropolitan staff and member agency staff at Metropolitan's Union Station Headquarters within 15 business days of receiving the appeal submittal. The appeals conference will serve as a forum to review the submittal materials and ensure that there is consensus understanding as to the spirit of the appeal. Metropolitan staff will provide an initial determination of the size of the appeal (small or large) and review the corresponding steps and timeline for completing the appeals process.

Steps 4-7 of the appeals process differ depending upon the size of the appeal

Small Appeals

Small appeals are defined as those that would change an agency's allocation by less than 10 percent, or are less than 5,000 acre-feet in quantity. Small appeals are evaluated and approved or denied by Metropolitan staff.

Step 4: Preliminary Decision

Metropolitan staff will provide a preliminary notice of decision to the member agency within 10 business days of the appeals conference. The preliminary decision timeline may be extended to accommodate requests for additional information, data, and documentation. The Appeals Liaison will mail a written letter to the member agency staff contact and General Manager, stating the preliminary decision and the rationale for approving or denying the appeal.

Step 5: Clarification Conference

Following the preliminary decision the Appeals Liaison will schedule a clarification conference. The member agency may choose to decline the clarification conference if they are satisfied with the preliminary decision. Declining the clarification conference serves as acceptance of the preliminary decision, and the decision becomes final upon approval by Metropolitan's executive staff.

Step 6: Final Decision

Metropolitan staff will provide a final notice of decision to the member agency within 10 business days of the clarification conference, pending review by Metropolitan's executive staff. The Appeals Liaison will mail a written letter to the member agency staff contact and General Manager, stating the final decision and the rationale for the decision. A copy of the letter will also be provided to Metropolitan executive staff.

Step 6a: Board Resolution of Small Appeal Claims

Member agencies may request to forward appeals that are denied by Metropolitan staff to the Board of Directors through the Water Planning and Stewardship Committee for final resolution. The request for Board resolution shall be submitted to the Appeals Liaison in the form of a written letter signed by the member agency General Manager. This request will be administered according to Steps 6 and 7 of the large appeals process.

Step 7: Board Notification

Metropolitan staff will provide a report to the Board of Directors, through the Water Planning and Stewardship Committee, on all submitted appeals including the basis for determination of the outcome of the appeal.

Large Appeals

Large appeals are defined as those that would change an agency's allocation by more than 10 percent, and are larger than 5,000 acre-feet. Large appeals are evaluated and approved or denied by the Board of Directors.

Step 4: Preliminary Recommendation

Metropolitan staff will provide a preliminary notice of recommendation to the member agency within 10 business days of the appeals conference. The preliminary decision timeline may be extended to accommodate requests for additional information, data, and documentation. The Appeals Liaison will mail a written letter to the member agency staff contact and General Manager, stating the preliminary recommendation and the rationale for the recommendation. A copy of the draft recommendation will also be provided to Metropolitan executive staff.

Step 5: Clarification Conference

Following the preliminary recommendation the Appeals Liaison will schedule a clarification conference. The member agency may choose to decline the clarification conference if the satisfied with preliminary recommendation. Declining the clarification conference signifies acceptance of the preliminary recommendation, and the recommendation becomes final upon approval by Metropolitan's executive staff.

Step 6: Final recommendation

Metropolitan staff will provide a final notice of recommendation to the member agency within 10 business days of the clarification conference, pending review by Metropolitan executive staff. The Appeals Liaison will mail a written letter to the member agency staff contact and General Manager, stating the final recommendation and the rationale for the recommendation. A copy of the final recommendation will also be provided for Metropolitan executive review.

Step 7: Board Action

Metropolitan staff shall refer the appeal to the Board of Directors through the Water Planning and Stewardship Committee for approval.

Appendix O: Appeals Submittal Checklist

Appeal Submittal

- Written letter (E-mail or other electronic formats will not be accepted)
- Signed by the Agency General Manager

Mailed to the appointed Metropolitan Appeals Liaison

Contact Information

- | | |
|---|--|
| <input type="checkbox"/> Designated staff contact | <input type="checkbox"/> General Manager |
| <input type="radio"/> Name | <input type="radio"/> Name |
| <input type="radio"/> Address | <input type="radio"/> Address |
| <input type="radio"/> Phone Number | <input type="radio"/> Phone Number |
| <input type="radio"/> E-mail Address | <input type="radio"/> E-mail Address |

Type of Appeal

- State the type of appeal
 - Erroneous historical data used in base period calculations
 - Metropolitan Deliveries
 - Local Production
 - Growth adjustment
 - Conservation savings
 - Exclusion of physically isolated areas
 - Extraordinary supply designation
 - Groundwater Replenishment Allocation
 - Base Period Mandatory Rationing Adjustment
 - Other

Quantity of Appeal

- State the quantity in acre-feet of the appeal

Justification and Supporting Documentation

- State the rationale for the appeal
- Provide verifiable documentation to support the stated rationale
 - Examples of verifiable documentation include, but are not limited to:
 - Billing Statements
 - Invoices for conservation device installations
 - Basin Groundwater/Watermaster Reports
 - California Department of Finance economic or population data
 - California Department of Public Health reports

Attachment 2 - Western Drought Allocation Plan

**Drought Allocation Plan
for the
Western Municipal Water District of Riverside County**

**Updated
May 2015**



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Section 2 Drought Allocation Plan Preparation

A fourth year of dry climate conditions throughout the state and uncertainty about water availability from the State Water Project have increased the possibility that Metropolitan may not have access to the supplies necessary to meet total firm demands at some point in the future and may have to allocate shortages in supplies to its member agencies. To prepare for this possibility, Metropolitan staff worked jointly with member agencies to develop an updated Water Shortage Allocation Plan (WSAP) for 2015 and beyond. This plan, which addresses the principles adopted by the Metropolitan Board of Directors in the 1999 *Water Surplus and Drought Management Plan* (WSDM Plan), was adopted by Metropolitan's Board of Directors in December 2014. A summary of the 2007 plan and the 2014 update is included in Appendix B, attached.

To facilitate implementation of Metropolitan's plan at the local level, Western has developed this DAP. The DAP identifies the methods that will be used to allocate limited imported supplies among Western's wholesale customers, if and when Metropolitan implements its WSAP.

Wholesale Customer Coordination

In 2008, the initial preparation and implementation of a DAP for the Western service area required input from Western's wholesale customers. Recognizing the importance of wholesale customer involvement for the first-of-its-kind plan document, Western created a workgroup, made up of staff from Western and the potentially affected wholesale customers. For this update, Western staff simply modified the allocation methodology so that it was consistent with Metropolitan's recently updated WSAP plan. These changes in methodology were presented to wholesale customer representatives at a regular meeting hosted by Western's general manager in January 2015. As these changes, which are explained in Section 3, did not substantially change the plan outcome, the need for formal workshops was unnecessary to gain support for this update.

Section 3 DAP Supply Allocation Methodology

This section includes a description of the updated supply allocation methodology developed following the 2014 modification of Metropolitan's WSAP. The goal of the DAP is to provide an equitable means of apportioning imported supplies during periods where Metropolitan implements the various shortage levels of its WSAP. This allocation methodology is consistent with the approach defined within Metropolitan's plan and has been adjusted for local needs and conditions. Appendix A, attached, includes estimated retail agency allocations based on the following methodology.

Base Period Calculations

The first step in estimating retail demands and wholesale water needs in the allocation year is to establish a base period with established water supply and delivery data that approximates a base operating condition within Western's service area. **The base period for each of the different categories of demands and supplies is calculated using data from the two most recent non-allocation years (Fiscal Years 2012-13 and 2013-14);** exceptions to this methodology are noted in the following descriptions of base period calculations.

The following are the components of the Base Period calculation:

Base Period Total Demand: Total water demands for the base period are calculated by adding the Base Period Import Supplies (the demands on Western), and the Base Period Local Supplies.

Base Period Local Supplies: Local supplies for the base period are calculated using the two-year average of groundwater production, groundwater recovery, surface-water production, and other imported supplies. Non-potable recycled water production is not included in this calculation. (This is to address the impact of demand hardening due to recycled water use.)

Base Period Wholesale Demands: Firm demands on Western for the base period are calculated using the two-year average of retail Municipal & Industrial (M&I) demands.

Base Period Gallons per Capita Daily (GPCD): Conservation Demand Hardening occurs at the retail water use level as consumers install more conservation-saving devices and participate in available programs. In order to estimate conservation savings, Metropolitan requires each member agency to establish an historical baseline GPCD calculated in a manner consistent with California Senate Bill SBx7-7. Western's 10-year GPCD base period for this plan is 1999 through 2008. The calculated regional Base Period GPCD is 362. Reductions from the Base Period GPCD to the Allocation Year are the basis used to calculate the equivalent conservation savings in acre-feet.

Allocation Year Calculations

The next step in estimating water demands in the allocation year is to adjust the base period estimates of retail demand for population or economic growth, and to adjust for changes in local supplies.

Allocation Year Demand Adjustment: Total retail demands for the allocation year are calculated by adjusting the Base Period Retail Demands for growth.

Growth Adjustment: The lesser of 159.4 GPCD (value provided by Metropolitan), or the calculated base period for each agency, is applied to the change in population from the base period to the allocation year.

Allocation Year Local Supplies: Allocation year local supplies are estimated using the base period local supplies and should include any adjustments for gains and losses of local supply, and extraordinary increases in production over the base period. These adjustments are made to give a more accurate estimate of actual supplies in the allocation year, and in turn, more accurately reflect an agency’s demand for supplies from Western.

Gain of Local Supply Adjustment: This adjustment accounts for planned or scheduled gains in local supply production above the base period, which are not due to extraordinary actions to increase water supply in the allocation year. These previously-scheduled increases in supply programs or local production should be added to the base period local supplies.

Loss of Local Supply Adjustment: This adjustment accounts for losses of local supply production from the base period. Losses of local supply, due to such things as hydrology or water quality, should be subtracted from the Base Period Local Supplies.

Extraordinary Increased Production Adjustment: This adjustment accounts for extraordinary increases in local supplies above the base period. Extraordinary increases in production include such efforts as purchasing transfers or mining of groundwater basins. In order not to discourage such extraordinary efforts, only a percentage of the yield from these supplies is added back to Allocation Year Local Supplies. This has the effect of “setting aside” the majority of the yield for the agency who procured the supply. The following table shows the percentages of the extraordinary increases in local supply that are counted in each level of supply allocation:

Regional Shortage Level (%)	Percentage Counted in Local Supply
1 (5%)	0%
2 (10%)	0%
3 (15%)	15%
4 (20%)	20%
5 (25%)	25%
6 (30%)	30%
7 (35%)	35%
8 (40%)	40%
9 (45%)	45%
10 (50%)	50%

Allocation Year Wholesale Demands: Demands on Western for the allocation year are calculated by subtracting the Allocation Year Local Supplies from the Allocation Year Retail Demands.

Allocation Formula and Accounting

The following table contains the elements used in the allocation formula. The formula was designed to be equitable on the wholesale level while helping to minimize hardships experienced by individuals and by the regional economy at the retail level.

(1) Regional Shortage Level	(2) Regional Shortage Percentage	(3) Wholesale Minimum Allocation	(4) Retail Impact Adjustment Maximum
1	5%	92.5%	0%
2	10%	85.0%	5.0%
3	15%	77.5%	7.5%
4	20%	70.0%	10.0%
5	25%	62.5%	12.5%
6	30%	55.0%	15.0%
7	35%	47.5%	17.5%
8	40%	40.0%	20.0%
9	45%	32.5%	22.5%
10	50%	25.0%	25.0%

Shortage Levels(1): The formula allocates shortages of Western supplies over ten levels: from 5 to 50 percent, in 5 percent increments.

Shortage Percentage(2): The maximum total regional shortage percentage of Western’s available supplies when compared to the sum of the demands in the allocation year.

Wholesale Minimum Allocation(3): The Wholesale Minimum Allocation is established to ensure a minimum level of wholesale water service (Western supplies) at the wholesale customer level, and sets the target for recognizing a wholesale customer’s ongoing investment in Western’s system. The Wholesale Minimum Allocation ensures that wholesale customers will not experience shortages on the wholesale level that are greater than one-and-a-half times the percentage shortage of Western’s regional water supplies. The Wholesale Minimum Allocation is equal to 100 percent minus one-and-a-half times the shortage level.

Retail Impact Adjustment Maximum(4): The Retail Impact Adjustment Maximum is the factor used to address major differences in retail level shortages associated with across-the-board cuts. The purpose of this adjustment is to ensure that agencies with a high level of dependence on Western do not experience highly disparate shortages compared to other agencies when faced with a reduction in wholesale water supplies. The Retail Impact Adjustment Maximum factor is calculated as the difference between the Regional Shortage Percentage and the Wholesale Minimum Allocation. The amount of the adjustment each wholesale customer receives is prorated on a linear scale, based on its dependence on Western at the retail level. The prorated amount of allocation is referred to as the Retail Impact Adjustment Allocation. For agencies that are 100 percent dependent on Western, this method will result in an allocation of Western supplies that, at the retail level, will result in a shortage equal to the Regional Shortage Percentage. In other words, through this allocation, no agency will experience a greater percentage shortage than the regional shortage percentage.

Conservation Demand Hardening Credit: The Conservation Demand Hardening Credit is calculated at the regional level in Metropolitan's WSAP. The value of the regional conservation credit is divided proportionally among the agencies within Western's service area that purchased imported water during the Base Period. The individual agency's volume of imported water is compared to the total of all agency purchases of imported water. The Conservation Demand hardening credit will be based on an initial 10 percent of the GPCD-based Conservation savings plus an additional 5 percent for each level of Regional Shortage set by the Board of Directors during implementation of the WSAP. The credit will also be adjusted for:

- overall percentage reduction in retail water demand, and
- Western's dependence on Metropolitan.

This provides a base demand hardening credit equal to 10 percent of conservation savings and increases the credit as deeper shortages occur, which is when conservation demand hardening has a bigger impact on the retail consumer. The credit also increases based on the percentage of an agency's demand that was reduced through conservation. This accounts for increased hardening that occurs as increasing amounts of conservation are implemented. Lastly, the credit is scaled to the member agency's dependence on Metropolitan to ensure that credits are being applied to the proportion of water demand that is being affected by reductions in Metropolitan supply.

M&I Allocation: The allocation of Western supplies to an agency for its retail demand is the sum of the Wholesale Minimum Allocation, the Retail Impact Adjustment, and the Conservation Demand Hardening Credit.

Allocation Example – Calculating Base Period Information to Determine Allocation Year Needs

The following example gives a step-by-step description of how the recommended formula would be used to calculate an allocation of Western's imported supplies to its wholesale customers and retail service area. This example is based on a Fiscal Year 2015-16 allocation using the average of Fiscal Year 2012-13 and Fiscal Year 2013-14 as the base period. The data used for this example was provided by each agency in late 2014.

Step 1: Calculate Base Period Retail Demand

The first step in developing an agency's allocation is to estimate the agency's retail level water needs. Two pieces of information are required to calculate retail level water needs:

- (1) The amount of local supplies that were produced in the base period, and
- (2) The amount of demands on Western in the base period.

Base Period Local Supplies are calculated using the average of production data from Fiscal Year 2012-13 and Fiscal Year 2013-14 for groundwater, groundwater recovery, surface water, and/or other non-Western imported supplies.

Base Period Wholesale Demands on Western are calculated using the same averaged time period as the Base Period Local Supplies.

Base Period Retail Demand can be calculated once the information described above has been determined. The sum of the Base Period Local Supplies and the Base Period Wholesale Demands equals the Base Period Retail Demand.

Step 2: Adjust Base Period Retail Demand for Growth

The second step in developing an agency’s allocation is to adjust the Base Period Retail Demand for growth that occurred since the Base Period. Based on Department of Finance statistics, the projected population growth in Riverside County was 1.12 percent for the period 2011 through 2013. The Base Period population is adjusted by 1.12 percent for each year between the Base Period and the allocation year. The change in the demand for water is calculated by multiplying the change in population by the lesser of 159.4 gallons per capita daily or the calculated base period GPCD for each agency.

Agency within Western	Applied GPCD
Box Springs Mutual Water Company	104.0
City of Corona	159.4
City of Norco	159.4
Eagle Valley Mutual Water Company	-
Elsinore Valley Municipal Water District	159.4
Lee Lake Water District	138.0
Metropolitan Water District	-
Rancho California Water District	159.4
Western Municipal Water District Retail	159.4

Allocation Year Retail Demand is the result of applying the growth adjustment to the Base Period Retail Demand. It represents a reasonable estimate of the total amount of firm water that an agency needs at the retail level in the year of allocation.

Step 3: Adjustment for changes in local supply from the Base Period

The third step in calculating each agency’s allocation is to calculate the agency’s local supply production in the year of the allocation. This is done by using Base Period Local Supplies that were calculated in Step 1 as a base estimate, and adding back any gains or losses in Base Period Local Supplies that are occurring in the allocation year. If an agency has undertaken extraordinary efforts to secure alternative supplies, this Extraordinary Increase in Local Supplies would also be added here.

Allocation Year Local Supplies are the result from adjusting the Base Period Local Supply for all of the changes listed above.

Step 4: Calculate Wholesale Water Needs in the Allocation Year

Now that both the Allocation Year Retail Demands and the Allocation Year Local Supplies have been estimated, the agency’s Allocation Year Wholesale Demand can be calculated.

Allocation Year Wholesale Demands on Western are calculated by subtracting the Allocation Year Local Supplies from the Allocation Year Retail Demands. Any demand that is remaining after the agency’s local supplies are accounted for represents demand for wholesale supplies from Western.

Dependence on Western is calculated as the percentage of an agency’s retail need that is met by Western wholesale supplies.

Step 5: Apply Base Period Conservation Demand Hardening Credit

The Conservation Demand Hardening Credit is calculated at the regional level in Metropolitan’s WSAP. The value of the regional conservation credit is divided proportionally between the agencies within Western’s service area that purchased imported water in the Base Period. The individual agency’s volume of imported water is compared to the total of all agencies purchases of imported water.

Allocation Example – Calculating a Supply Allocation in a Regional Shortage Level 3

This example will follow the allocation formula accounting, through a Regional Shortage Level 3 (15%). The table below shows the essential elements of the allocation formula under a Regional Shortage Level 3.

(1) Regional Shortage Level	(2) Regional Shortage Percentage	(3) Wholesale Minimum Allocation	(4) Retail Impact Adjustment Maximum
3	15%	77.5%	7.5%

Step 1: Calculate Wholesale Minimum Allocation

The Wholesale Minimum Allocation is calculated by multiplying the agency’s Allocation Year Wholesale Demand by the Wholesale Minimum Allocation percentage from the allocation table.

Step 2: Calculate Retail Impact Adjustment Allocation

The next step in determining this agency’s allocation is to calculate the Retail Impact Adjustment Allocation. Recall from the allocation table, the Retail Impact Adjustment Maximum factor is the difference between the Wholesale Minimum Allocation and the Regional Shortage Percentage. Under a Regional Shortage Level 3 (15 percent), the Retail Impact Adjustment Maximum factor available to any agency is 7.5 percent. Each agency’s Retail Impact Adjustment factor is calculated by multiplying the 7.5 percent Retail Impact Adjustment Maximum factor by the agency’s Dependence of Western, which was calculated in a previous step.

Step 3: Apply the Conservation Hardening Credit

Step 4: Add the Wholesale Minimum Allocation, the Retail Impact Adjustment Allocation, and the Conservation Hardening Credit to get the final M&I agency allocation.

The Wholesale Minimum Allocation, the Retail Impact Adjustment Allocation, and the Conservation Hardening Credit are added together to total to the M&I allocation.

Step 5: Add Unallocated Supplies

After each agency’s M&I allocation is calculated, each agency’s M&I allocation is added together to determine the total M&I allocation for all of Western’s wholesale customers. As with the example above, if the total M&I allocation is lower than the allocation that Western is receiving from Metropolitan, the surplus is allocated among the wholesale customers based on the proportion of each agency’s Wholesale Minimum Allocation to the Western’s total Wholesale Minimum Allocation. If the amount is greater than

the allocation from Metropolitan, then the next regional shortage level will be applied until the total M&I allocation is equal or less than allocation from Metropolitan.

Step 6: Total Allocation

The final step in calculating this agency's allocation of Western supplies is to sum up all of the elements of the allocation formula that were calculated above.

Section 4 Estimate of Retail Agency Allocation under Drought Allocation Plan

Western (retail) and the retail water suppliers within Western’s general service area are, to varying degrees, dependent upon Metropolitan for imported water supply. The following table summarizes the estimated impact of the Metropolitan Board of Directors-adopted (December 2014) WSAP process for the allocation of water supplies to Western’s general service area during ten levels of water supply shortage. The water supply available to Western is further allocated between the retail water suppliers in a fashion similar to the Metropolitan process.

MWD WATER SUPPLY ALLOCATION PLAN - 2014 UPDATE			
Regional Shortage Level	MWD Declared Shortage	Import Water Available ¹	Regional Reduction Level ²
0	-	-	-
1	-5.0%	72,689	-5.1%
2	-10.0%	72,689	-5.1%
3	-15.0%	71,496	-6.7%
4	-20.0%	69,489	-9.3%
5	-25.0%	67,482	-11.9%
6	-30.0%	65,475	-14.5%
7	-35.0%	63,469	-17.2%
8	-40.0%	61,462	-19.8%
9	-45.0%	59,455	-22.4%
10	-50.0%	57,488	-25.0%

FY 2014 Import Demand = 76,614 acre feet.

1. The total *Imported Water Available* subject to change based on the certification of local production at the end of a fiscal year.
2. *Regional Reduction Level* percentages are based on FY 2014 imported water demands, not the base period demands. The reduction levels also apply to the region as a whole, not to the individual retail agencies.

Appendix B includes an overview of Metropolitan’s WSAP methodology for shortage allocations. Western will use a process similar to that of Metropolitan to allocate imported water supplies among the retail water agencies within Western’s general service area. Agencies that purchased water in the Metropolitan base period (Fiscal Years 2012-13 and 2013-14) share in the allocation of imported water. These agencies include: Box Springs Mutual Water Company, the City of Corona Department of Water and Power, Eagle Valley Mutual Water Company, Elsinore Valley Municipal Water District, Lee Lake Water District, Metropolitan, the City of Norco, Rancho California Water District, and Western Municipal Water District for its retail water service area. The following agencies within Western’s general service area did not purchase imported water during Metropolitan’s base period and, therefore, are not included in the allocation of imported water supplies: Home Gardens County Water District, Jurupa Community Services District, the City of Riverside Public Utilities, Riverside Highlands Water Company, and Rubidoux Community Services District.

The following table summarizes the estimated imported water supply available to the retail water suppliers within Western’s general service area at each of Metropolitan’s shortage levels 1 through 10. These values are estimates as the actual volumes of water available to each agency are dependent on the production of local

supplies throughout Western’s imported agency region and is reconciled at the completion of each fiscal year during which a Metropolitan water allocation is in place.

Shortage Level	Box Springs MWC	City of Corona	Eagle Valley MWC	Elsinore Valley MWD	Lee Lake WD	MWD	City of Norco	Rancho California WD	Western MWD (Retail)	Total
1	88	14,643	488	16,734	3,104	11	171	17,797	19,646	72,689
2	88	14,643	488	16,734	3,104	11	171	17,797	19,646	72,689
3	84	14,275	437	16,639	3,098	10	154	17,455	19,339	71,496
4	81	13,799	411	16,230	3,037	9	143	16,946	18,828	69,489
5	77	13,323	385	15,822	2,976	9	133	16,436	18,317	67,482
6	74	12,847	360	15,413	2,915	8	122	15,927	17,806	65,475
7	70	12,371	334	15,005	2,855	7	111	15,417	17,294	63,469
8	66	11,896	308	14,596	2,794	7	101	14,907	16,783	61,462
9	63	11,420	283	14,188	2,733	6	90	14,398	16,272	59,455
10	59	10,944	257	13,780	2,672	6	80	13,888	15,760	57,488

Appendix A includes spreadsheets detailing the calculation of retail agency allocations under Metropolitan shortage allocation levels 1 through 10.

Section 5 Allocation Plan Implementation Elements

The following are the implementation elements that are necessary for administering an allocation during a time of shortage. These elements cover the processes needed to declare a shortage level as well as providing a penalty rate structure for enforcing each agency's allocation.

Implementing an Allocation of Supplies

At this time, it is anticipated that the only time Western would allocate imported supplies from Metropolitan is if Metropolitan is forced to allocate its supplies through its WSAP process.

Setting the Shortage Level

Should Metropolitan implement the WSAP, Western staff will determine the appropriate Shortage Level so that supplies allocated at the Western service area level are equal to or less than the Metropolitan allocation. Simultaneously, Western will determine whether any appeals need to be filed with Metropolitan.

Allocation Period

The allocation period for the DAP will be consistent with the period defined within Metropolitan's WSAP. This allocation period covers twelve consecutive months, typically from July of a given year through the following June. This period was selected by Metropolitan so as to minimize the impacts of varying State Water Project allocations. It was also selected to provide wholesale customers with sufficient time to implement their outreach strategies and rate modifications. Metropolitan has indicated that it is their intention when possible to set allocations through the declaration of a shortage level at the April Board of Directors' meeting preceding the next fiscal year.

Determination of Penalties

At the end of the allocation year, Metropolitan will bill Western for any accrued penalties. Penalties will be based on the water rates in effect the last day of June of the allocation year. Western will bill its agencies for penalties based on its penalty rate structure. Any excess funds collected will be refunded proportionately to those agencies that paid penalties.

Allocation Surcharge

At the end of each allocation year, Metropolitan will bill Western for any accrued Allocation Surcharges ("surcharges") based on Metropolitan's adopted WSAP. Western will pass-through Metropolitan's surcharges to its retail agencies (which includes Western's own retail customers) based on Metropolitan's allocation surcharge rate structure described at the end of this section.

If Western exceeds its total allocation from Metropolitan for the year, the underutilization of any individual retail agency's allocation will be reallocated that year to other retail agencies that exceed their allocation in accordance with the same methodology used when Western exceeds its total Metropolitan Tier 1 Maximum. This methodology is described in Western's Board of Directors-adopted "Determining Water Rates and Charges for Water User Agencies" Resolution (this Resolution changes from time to time and is currently Resolution 2876). Only retail agencies that had Metropolitan water deliveries in the WSAP base year, and thus contributed to the amount of Metropolitan water allocated to Western, will be included in the underutilization reallocation calculation described in this paragraph.

No billing or assessment of surcharges to retail agencies will take place until the end of the twelve-month allocation year unless Western at its sole discretion determines that significant surcharges are probable. In this latter case, Western will use an equitable method of invoicing all or a portion of such anticipated surcharges to

retail agencies exceeding their individual allocation. This invoicing will be done prior to the end of the allocation year. At the end of the allocation year and after being assessed any surcharges by Metropolitan, Western will reconcile any collected surcharge revenue and issue invoices or credit memos to retail agencies accordingly, with invoice payment terms consistent with those described in the current applicable Resolution (referenced in the previous paragraph). The purpose of this latter provision is to reduce Western’s risk from collecting significant receivable amounts after the end of the allocation year. If at the end of the allocation year Western does not incur any surcharges from Metropolitan, then individual retail agencies will not be invoiced for surcharges (or will be refunded any surcharges paid in advance of year-end).

Metropolitan’s surcharge is based on the costs that Metropolitan and its member agencies are incurring to implement outdoor water use reductions through turf removal programs. The surcharge is designed to provide a price signal based on the marginal conservation costs incurred to reduce water use in dry and shortage years. Any revenues collected by Metropolitan from the surcharge would be used to fund the implementation of the Turf Removal Program, or other similar programs designed to conserve water and reduce future demands.

Metropolitan is currently paying \$2 per square foot of turf removed. The estimated water savings is 44 gallons per year for each square foot of turf removed for a period of ten years. Based on this savings rate, the estimated cost of the program is \$1,480 per acre-foot. Water use between 100 percent and 115 percent of a member agency’s water supply allocations would be charged with a surcharge of \$1,480 per acre-foot. Water use greater than 115 percent would be charged two times the surcharge or \$2,960 per acre-foot. Two times the surcharge would allow the funding of additional turf removal and conservation programs to conserve additional water and further reduce demand or, if appropriate, allow for a higher per square foot incentive payment. The surcharge rates are assessed in addition to the normal rates for Metropolitan water purchases. The penalty rate structure is summarized in the table below:

Water Use	Allocation Surcharge In Addition to Cost of Water
100% of Allocation	\$0
Between 100% & 115%	\$1,480
Greater than 115%	\$2,960

Below are three potential scenarios related to the assessment of the surcharge:

Scenario 1: Retail agency water deliveries are less than Western’s Metropolitan allocation. The result after the allocation year would be that retail agencies would not owe any surcharges even if agencies are over their individual allocation.

Scenario 2: Retail agency water deliveries are over Western’s Metropolitan allocation, but less than 115 percent. The \$1,480 per acre-foot surcharge would be assessed only to retail agencies that exceed their individual allocation after taking into consideration the proration of underutilized allocation.

Scenario 3: Retail agency water deliveries are over Western’s Metropolitan allocation by more than 115 percent with individual agencies’ exceedance varying. First, underutilized allocation would be prorated to the water deliveries that are over by 100 and 115 percent, with the balance assessed a surcharge of \$1,480 per acre-foot. Any water remaining that exceeds 115 percent would be assessed a surcharge of \$2,960 per acre-foot (two times \$1,480).

Appendix A Wholesale Customer Allocation by Shortage Level

Shortage Level 1: Calculations Spreadsheet

	BOX SPRINGS	CORONA	EAGLE VALLEY	EVMWD	LLWD	MWD	NORCO	RANCHO	WESTERN	TOTAL	
BASE PERIOD DEMAND											
Base Period Import Supplies (AVG FY13 & FY14)	86	15,518	514	19,214	3,074	11	93	18,029	19,060	75,599	
Base Period Local Supplies (AVG FY13 & FY14)	295	19,177	0	7,832	0	0	8,651	10,562	6,136	52,653	
Base Period Total Demand	380	34,696	514	27,047	3,074	11	8,743	28,591	25,196	128,252	
ALLOCATION YEAR DEMAND ADJUSTMENT											
Base Period Average Population	3,300	158,611	0	139,599	19,962	0	27,063	24,742	94,807	468,083	
% of growth	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	
Allocation Year Population	3,337	160,390	0	141,165	20,185	0	27,367	25,019	95,871	473,334	
GPCD Applied to Growth	104	159	0	159	138	0	159	159	159	159	
Demand Growth	4.29	317.71	0.00	279.63	34.62	0.00	54.21	49.56	189.91	938.00	
LESS Growth in Conservation & Recycling	3.26	297.17	0.00	231.66	26.33	0.00	74.89	244.89	215.81	1094.00	
Adjusted Allocation Year Demand	381	34,716	514	27,094	3,082	11	8,722	28,396	25,170	128,096	
ALLOCATION YEAR IMPORT DEMAND											
Allocation Year Local Supplies (FY2014)	292	20,012	0	10,466	0	0	8,543	10,571	5,523	55,407	
Allocation Year Imported Demand	89	14,704	514	16,628	3,082	11	179	17,825	19,647	72,689	
IMPORT MINIMUM ALLOCATION											
Import Minimum Percentage	92.5%	92.5%	92.5%	92.5%	92.5%	92.5%	92.5%	92.5%	92.5%	92.5%	
Import Minimum Allocation	82.7	13,601.3	475.2	15,381.3	2,851.0	10.6	165.9	16,487.8	18,173.9	67,237.2	
RETAIL IMPACT ADJUSTMENT CREDIT¹											
Dependence on Metropolitan	23%	42%	100%	61%	100%	100%	2%	63%	78%	57%	
Retail Impact Adjustment Allocation	0.6%	1.1%	2.5%	1.5%	2.5%	2.5%	0.1%	1.6%	2.0%	1.4%	
Retail Impact Adjustment CREDIT	0.5	155.7	12.8	255.1	77.1	0.3	0.1	279.7	383.4	1,031.2	
Import Allocation with Retail Credit	83.3	13,757.0	488.0	15,636.5	2,928.0	10.9	166.0	16,767.5	18,557.3	68,268.4	
DEMAND HARDENING CREDIT²											
<p>1. The MWD Retail Impact Adjustment Credit, when applied to the individual water agencies within Western's general service area, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such the amount of water over allocated is subtracted from the total Demand Hardening Credit.</p> <p>2. The MWD Conservation Demand Hardening Credit methodology, when applied to the various GPCD values and GPCD changes at the local level with significantly lower water demands, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such, the wholesale Demand Hardening Credit has been divided among the urban retail water suppliers in proportion to the base period demand for imported water relative to the total imported water demand for all urban retail water suppliers.</p>										Base GPCD Allocation Year GPCD Change in GPCD Acre-Foot Change Regional Shortage Percentage GPCD Percent Reduction	362 242 120 63,837 5% 33.3%
Demand Hardening Credit	5	886	0	1,097	176	0	5	1,029	1,088	4,420	
TOTAL DAP IMPORT ALLOCATION											
Total DAP Allocation	88	14,643	488	16,734	3,104	11	171	17,797	19,646	72,689	

The table above illustrates the calculation of the estimated import water supply available to each water supplier within Western's service area during DAP Shortage Level 1. All values are estimates as the actual volumes of water available to each agency are ultimately dependent on the certified production of local supplies throughout Western's import agency region. The final allocation will be reconciled at the completion of each fiscal year during which a water allocation is in place.

Shortage Level 2: Calculations Spreadsheet

	BOX SPRINGS	CORONA	EAGLE VALLEY	EVMWD	LLWD	MWD	NORCO	RANCHO	WESTERN	TOTAL	
BASE PERIOD DEMAND											
Base Period Import Supplies (AVG FY13 & FY14)	86	15,518	514	19,214	3,074	11	93	18,029	19,060	75,599	
Base Period Local Supplies (AVG FY13 & FY14)	295	19,177	0	7,832	0	0	8,651	10,562	6,136	52,653	
Base Period Total Demand	380	34,696	514	27,047	3,074	11	8,743	28,591	25,196	128,252	
ALLOCATION YEAR DEMAND ADJUSTMENT											
Base Period Average Population	3,300	158,611	0	139,599	19,962	0	27,063	24,742	94,807	468,083	
% of growth	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	
Allocation Year Population	3,337	160,390	0	141,165	20,185	0	27,367	25,019	95,871	473,334	
GPCD Applied to Growth	104	159	0	159	138	0	159	159	159	159	
Demand Growth	4.29	317.71	0.00	279.63	34.62	0.00	54.21	49.56	189.91	938.00	
LESS Growth in Conservation & Recycling	3.26	297.17	0.00	231.66	26.33	0.00	74.89	244.89	215.81	1094.00	
Adjusted Allocation Year Demand	381	34,716	514	27,094	3,082	11	8,722	28,396	25,170	128,096	
ALLOCATION YEAR IMPORT DEMAND											
Allocation Year Local Supplies (FY2014)	292	20,012	0	10,466	0	0	8,543	10,571	5,523	55,407	
Allocation Year Imported Demand	89	14,704	514	16,628	3,082	11	179	17,825	19,647	72,689	
IMPORT MINIMUM ALLOCATION											
Import Minimum Percentage	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%	85.0%	
Import Minimum Allocation	76.0	12,498.5	436.6	14,134.2	2,619.8	9.7	152.4	15,151.0	16,700.4	61,785.5	
RETAIL IMPACT ADJUSTMENT CREDIT¹											
Dependence on Metropolitan	23%	42%	100%	61%	100%	100%	2%	63%	78%	57%	
Retail Impact Adjustment Allocation	1.2%	2.1%	5.0%	3.1%	5.0%	5.0%	0.1%	3.1%	3.9%	2.8%	
Retail Impact Adjustment CREDIT	1.0	311.4	25.7	510.3	154.1	0.6	0.2	559.4	766.8	2,062.4	
Import Allocation with Retail Credit	77.1	12,809.9	462.3	14,644.5	2,773.9	10.3	152.6	15,710.4	17,467.2	63,847.9	
DEMAND HARDENING CREDIT²											
<p>1. The MWD Retail Impact Adjustment Credit, when applied to the individual water agencies within Western's general service area, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such the amount of water over allocated is subtracted from the total Demand Hardening Credit.</p> <p>2. The MWD Conservation Demand Hardening Credit methodology, when applied to the various GPCD values and GPCD changes at the local level with significantly lower water demands, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such, the wholesale Demand Hardening Credit has been divided among the urban retail water suppliers in proportion to the base period demand for imported water relative to the total imported water demand for all urban retail water suppliers.</p>										Base GPCD Allocation Year GPCD Change in GPCD Acre-Foot Change Regional Shortage Percentage GPCD Percent Reduction	362 242 120 63,837 10% 33.3%
Demand Hardening Credit	10	1,772	0	2,194	351	0	11	2,059	2,177	8,841	
TOTAL DAP IMPORT ALLOCATION											
Total DAP Allocation	87	14,582	462	16,839	3,125	10	163	17,769	19,644	72,689	

The table above illustrates the calculation of the estimated import water supply available to each water supplier within Western's service area during DAP Shortage Level 2. All values are estimates as the actual volumes of water available to each agency are ultimately dependent on the certified production of local supplies throughout Western's import agency region. The final allocation will be reconciled at the completion of each fiscal year during which a water allocation is in place.

Shortage Level 3: Calculations Spreadsheet

	BOX SPRINGS	CORONA	EAGLE VALLEY	EVMWD	LLWD	MWD	NORCO	RANCHO	WESTERN	TOTAL	
BASE PERIOD DEMAND											
Base Period Import Supplies (AVG FY13 & FY14)	86	15,518	514	19,214	3,074	11	93	18,029	19,060	75,599	
Base Period Local Supplies (AVG FY13 & FY14)	295	19,177	0	7,832	0	0	8,651	10,562	6,136	52,653	
Base Period Total Demand	380	34,696	514	27,047	3,074	11	8,743	28,591	25,196	128,252	
ALLOCATION YEAR DEMAND ADJUSTMENT											
Base Period Average Population	3,300	158,611	0	139,599	19,962	0	27,063	24,742	94,807	468,083	
% of growth	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	
Allocation Year Population	3,337	160,390	0	141,165	20,185	0	27,367	25,019	95,871	473,334	
GPCD Applied to Growth	104	159	0	159	138	0	159	159	159	159	
Demand Growth	4.29	317.71	0.00	279.63	34.62	0.00	54.21	49.56	189.91	938.00	
LESS Growth in Conservation & Recycling	3.26	297.17	0.00	231.66	26.33	0.00	74.89	244.89	215.81	1094.00	
Adjusted Allocation Year Demand	381	34,716	514	27,094	3,082	11	8,722	28,396	25,170	128,096	
ALLOCATION YEAR IMPORT DEMAND											
Allocation Year Local Supplies (FY2014)	292	20,012	0	10,466	0	0	8,543	10,571	5,523	55,407	
Allocation Year Imported Demand	89	14,704	514	16,628	3,082	11	179	17,825	19,647	72,689	
IMPORT MINIMUM ALLOCATION											
Import Minimum Percentage	77.5%	77.5%	77.5%	77.5%	77.5%	77.5%	77.5%	77.5%	77.5%	77.5%	
Import Minimum Allocation	69.3	11,395.7	398.1	12,887.1	2,388.7	8.9	139.0	13,814.1	15,226.8	56,333.9	
RETAIL IMPACT ADJUSTMENT CREDIT¹											
Dependence on Metropolitan	23%	42%	100%	61%	100%	100%	2%	63%	78%	57%	
Retail Impact Adjustment Allocation	1.8%	3.2%	7.5%	4.6%	7.5%	7.5%	0.2%	4.7%	5.9%	4.3%	
Retail Impact Adjustment CREDIT	1.6	467.1	38.5	765.4	231.2	0.9	0.3	839.2	1,150.2	3,093.6	
Import Allocation with Retail Credit	70.9	11,862.8	436.6	13,652.5	2,619.8	9.7	139.3	14,653.3	16,377.0	59,427.4	
DEMAND HARDENING CREDIT²											
<p>1. The MWD Retail Impact Adjustment Credit, when applied to the individual water agencies within Western's general service area, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such the amount of water over allocated is subtracted from the total Demand Hardening Credit.</p> <p>2. The MWD Conservation Demand Hardening Credit methodology, when applied to the various GPCD values and GPCD changes at the local level with significantly lower water demands, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such, the wholesale Demand Hardening Credit has been divided among the urban retail water suppliers in proportion to the base period demand for imported water relative to the total imported water demand for all urban retail water suppliers.</p>										Base GPCD Allocation Year GPCD Change in GPCD Acre-Foot Change Regional Shortage Percentage GPCD Percent Reduction	362 242 120 63,837 15% 33.3%
Demand Hardening Credit	13	2,412	0	2,986	478	0	14	2,802	2,962	12,068	
TOTAL DAP IMPORT ALLOCATION											
Total DAP Allocation	84	14,275	437	16,639	3,098	10	154	17,455	19,339	71,496	

The table above illustrates the calculation of the estimated import water supply available to each water supplier within Western's service area during DAP Shortage Level 3. All values are estimates as the actual volumes of water available to each agency are ultimately dependent on the certified production of local supplies throughout Western's import agency region. The final allocation will be reconciled at the completion of each fiscal year during which a water allocation is in place.

Shortage Level 4: Calculations Spreadsheet

	BOX SPRINGS	CORONA	EAGLE VALLEY	EVMWD	LLWD	MWD	NORCO	RANCHO	WESTERN	TOTAL	
BASE PERIOD DEMAND											
Base Period Import Supplies (AVG FY13 & FY14)	86	15,518	514	19,214	3,074	11	93	18,029	19,060	75,599	
Base Period Local Supplies (AVG FY13 & FY14)	295	19,177	0	7,832	0	0	8,651	10,562	6,136	52,653	
Base Period Total Demand	380	34,696	514	27,047	3,074	11	8,743	28,591	25,196	128,252	
ALLOCATION YEAR DEMAND ADJUSTMENT											
Base Period Average Population	3,300	158,611	0	139,599	19,962	0	27,063	24,742	94,807	468,083	
% of growth	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	
Allocation Year Population	3,337	160,390	0	141,165	20,185	0	27,367	25,019	95,871	473,334	
GPCD Applied to Growth	104	159	0	159	138	0	159	159	159	159	
Demand Growth	4.29	317.71	0.00	279.63	34.62	0.00	54.21	49.56	189.91	938.00	
LESS Growth in Conservation & Recycling	3.26	297.17	0.00	231.66	26.33	0.00	74.89	244.89	215.81	1094.00	
Adjusted Allocation Year Demand	381	34,716	514	27,094	3,082	11	8,722	28,396	25,170	128,096	
ALLOCATION YEAR IMPORT DEMAND											
Allocation Year Local Supplies (FY2014)	292	20,012	0	10,466	0	0	8,543	10,571	5,523	55,407	
Allocation Year Imported Demand	89	14,704	514	16,628	3,082	11	179	17,825	19,647	72,689	
IMPORT MINIMUM ALLOCATION											
Import Minimum Percentage	70.0%	70.0%	70.0%	70.0%	70.0%	70.0%	70.0%	70.0%	70.0%	70.0%	
Import Minimum Allocation	62.6	10,292.9	359.6	11,639.9	2,157.5	8.0	125.5	12,477.3	13,753.2	50,882.2	
RETAIL IMPACT ADJUSTMENT CREDIT¹											
Dependence on Metropolitan	23%	42%	100%	61%	100%	100%	2%	63%	78%	57%	
Retail Impact Adjustment Allocation	2.3%	4.2%	10.0%	6.1%	10.0%	10.0%	0.2%	6.3%	7.8%	5.7%	
Retail Impact Adjustment CREDIT	2.1	622.8	51.4	1,020.5	308.2	1.1	0.4	1,118.9	1,533.6	4,124.8	
Import Allocation with Retail Credit	64.7	10,915.6	411.0	12,660.5	2,465.7	9.2	125.9	13,596.2	15,286.9	55,007.0	
DEMAND HARDENING CREDIT²											
<p>1. The MWD Retail Impact Adjustment Credit, when applied to the individual water agencies within Western's general service area, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such the amount of water over allocated is subtracted from the total Demand Hardening Credit.</p> <p>2. The MWD Conservation Demand Hardening Credit methodology, when applied to the various GPCD values and GPCD changes at the local level with significantly lower water demands, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such, the wholesale Demand Hardening Credit has been divided among the urban retail water suppliers in proportion to the base period demand for imported water relative to the total imported water demand for all urban retail water suppliers.</p>										Base GPCD Allocation Year GPCD Change in GPCD Acre-Foot Change Regional Shortage Percentage GPCD Percent Reduction	362 242 120 63,837 20% 33.3%
Demand Hardening Credit	16	2,883	0	3,570	571	0	17	3,350	3,541	14,482	
TOTAL DAP IMPORT ALLOCATION											
Total DAP Allocation	81	13,799	411	16,230	3,037	9	143	16,946	18,828	69,489	

The table above illustrates the calculation of the estimated import water supply available to each water supplier within Western's service area during DAP Shortage Level 4. All values are estimates as the actual volumes of water available to each agency are ultimately dependent on the certified production of local supplies throughout Western's import agency region. The final allocation will be reconciled at the completion of each fiscal year during which a water allocation is in place.

Shortage Level 5: Calculations Spreadsheet

	BOX SPRINGS	CORONA	EAGLE VALLEY	EVMWD	LLWD	MWD	NORCO	RANCHO	WESTERN	TOTAL	
BASE PERIOD DEMAND											
Base Period Import Supplies (AVG FY13 & FY14)	86	15,518	514	19,214	3,074	11	93	18,029	19,060	75,599	
Base Period Local Supplies (AVG FY13 & FY14)	295	19,177	0	7,832	0	0	8,651	10,562	6,136	52,653	
Base Period Total Demand	380	34,696	514	27,047	3,074	11	8,743	28,591	25,196	128,252	
ALLOCATION YEAR DEMAND ADJUSTMENT											
Base Period Average Population	3,300	158,611	0	139,599	19,962	0	27,063	24,742	94,807	468,083	
% of growth	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	
Allocation Year Population	3,337	160,390	0	141,165	20,185	0	27,367	25,019	95,871	473,334	
GPCD Applied to Growth	104	159	0	159	138	0	159	159	159	159	
Demand Growth	4.29	317.71	0.00	279.63	34.62	0.00	54.21	49.56	189.91	938.00	
LESS Growth in Conservation & Recycling	3.26	297.17	0.00	231.66	26.33	0.00	74.89	244.89	215.81	1094.00	
Adjusted Allocation Year Demand	381	34,716	514	27,094	3,082	11	8,722	28,396	25,170	128,096	
ALLOCATION YEAR IMPORT DEMAND											
Allocation Year Local Supplies (FY2014)	292	20,012	0	10,466	0	0	8,543	10,571	5,523	55,407	
Allocation Year Imported Demand	89	14,704	514	16,628	3,082	11	179	17,825	19,647	72,689	
IMPORT MINIMUM ALLOCATION											
Import Minimum Percentage	62.5%	62.5%	62.5%	62.5%	62.5%	62.5%	62.5%	62.5%	62.5%	62.5%	
Import Minimum Allocation	55.9	9,190.0	321.1	10,392.8	1,926.3	7.2	112.1	11,140.4	12,279.7	45,430.5	
RETAIL IMPACT ADJUSTMENT CREDIT¹											
Dependence on Metropolitan	23%	42%	100%	61%	100%	100%	2%	63%	78%	57%	
Retail Impact Adjustment Allocation	2.9%	5.3%	12.5%	7.7%	12.5%	12.5%	0.3%	7.8%	9.8%	7.1%	
Retail Impact Adjustment CREDIT	2.6	778.5	64.2	1,275.7	385.3	1.4	0.5	1,398.6	1,917.0	5,156.0	
Import Allocation with Retail Credit	58.5	9,968.5	385.3	11,668.5	2,311.6	8.6	112.5	12,539.0	14,196.7	50,586.5	
DEMAND HARDENING CREDIT²											
<p>1. The MWD Retail Impact Adjustment Credit, when applied to the individual water agencies within Western's general service area, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such the amount of water over allocated is subtracted from the total Demand Hardening Credit.</p> <p>2. The MWD Conservation Demand Hardening Credit methodology, when applied to the various GPCD values and GPCD changes at the local level with significantly lower water demands, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such, the wholesale Demand Hardening Credit has been divided among the urban retail water suppliers in proportion to the base period demand for imported water relative to the total imported water demand for all urban retail water suppliers.</p>										Base GPCD Allocation Year GPCD Change in GPCD Acre-Foot Change Regional Shortage Percentage GPCD Percent Reduction	362 242 120 63,837 25% 33.3%
Demand Hardening Credit	19	3,354	0	4,153	664	0	20	3,897	4,120	16,896	
TOTAL DAP IMPORT ALLOCATION											
Total DAP Allocation	77	13,323	385	15,822	2,976	9	133	16,436	18,317	67,482	

The table above illustrates the calculation of the estimated import water supply available to each water supplier within Western's service area during DAP Shortage Level 5. All values are estimates as the actual volumes of water available to each agency are ultimately dependent on the certified production of local supplies throughout Western's import agency region. The final allocation will be reconciled at the completion of each fiscal year during which a water allocation is in place.

Shortage Level 6: Calculations Spreadsheet

	BOX SPRINGS	CORONA	EAGLE VALLEY	EVMWD	LLWD	MWD	NORCO	RANCHO	WESTERN	TOTAL	
BASE PERIOD DEMAND											
Base Period Import Supplies (AVG FY13 & FY14)	86	15,518	514	19,214	3,074	11	93	18,029	19,060	75,599	
Base Period Local Supplies (AVG FY13 & FY14)	295	19,177	0	7,832	0	0	8,651	10,562	6,136	52,653	
Base Period Total Demand	380	34,696	514	27,047	3,074	11	8,743	28,591	25,196	128,252	
ALLOCATION YEAR DEMAND ADJUSTMENT											
Base Period Average Population	3,300	158,611	0	139,599	19,962	0	27,063	24,742	94,807	468,083	
% of growth	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	
Allocation Year Population	3,337	160,390	0	141,165	20,185	0	27,367	25,019	95,871	473,334	
GPCD Applied to Growth	104	159	0	159	138	0	159	159	159	159	
Demand Growth	4.29	317.71	0.00	279.63	34.62	0.00	54.21	49.56	189.91	938.00	
LESS Growth in Conservation & Recycling	3.26	297.17	0.00	231.66	26.33	0.00	74.89	244.89	215.81	1094.00	
Adjusted Allocation Year Demand	381	34,716	514	27,094	3,082	11	8,722	28,396	25,170	128,096	
ALLOCATION YEAR IMPORT DEMAND											
Allocation Year Local Supplies (FY2014)	292	20,012	0	10,466	0	0	8,543	10,571	5,523	55,407	
Allocation Year Imported Demand	89	14,704	514	16,628	3,082	11	179	17,825	19,647	72,689	
IMPORT MINIMUM ALLOCATION											
Import Minimum Percentage	55.0%	55.0%	55.0%	55.0%	55.0%	55.0%	55.0%	55.0%	55.0%	55.0%	
Import Minimum Allocation	49.2	8,087.2	282.5	9,145.7	1,695.2	6.3	98.6	9,803.6	10,806.1	39,978.9	
RETAIL IMPACT ADJUSTMENT CREDIT¹											
Dependence on Metropolitan	23%	42%	100%	61%	100%	100%	2%	63%	78%	57%	
Retail Impact Adjustment Allocation	3.5%	6.4%	15.0%	9.2%	15.0%	15.0%	0.3%	9.4%	11.7%	8.5%	
Retail Impact Adjustment CREDIT	3.1	934.2	77.1	1,530.8	462.3	1.7	0.6	1,678.3	2,300.5	6,187.2	
Import Allocation with Retail Credit	52.3	9,021.4	359.6	10,676.4	2,157.5	8.0	99.2	11,481.9	13,106.6	46,166.0	
DEMAND HARDENING CREDIT²											
<p>1. The MWD Retail Impact Adjustment Credit, when applied to the individual water agencies within Western's general service area, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such the amount of water over allocated is subtracted from the total Demand Hardening Credit.</p> <p>2. The MWD Conservation Demand Hardening Credit methodology, when applied to the various GPCD values and GPCD changes at the local level with significantly lower water demands, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such, the wholesale Demand Hardening Credit has been divided among the urban retail water suppliers in proportion to the base period demand for imported water relative to the total imported water demand for all urban retail water suppliers.</p>										Base GPCD Allocation Year GPCD Change in GPCD Acre-Foot Change Regional Shortage Percentage GPCD Percent Reduction	362 242 120 63,837 30% 33.3%
Demand Hardening Credit	21	3,826	0	4,737	758	0	23	4,445	4,699	19,309	
TOTAL DAP IMPORT ALLOCATION											
Total DAP Allocation	74	12,847	360	15,413	2,915	8	122	15,927	17,806	65,475	

The table above illustrates the calculation of the estimated import water supply available to each water supplier within Western's service area during DAP Shortage Level 6. All values are estimates as the actual volumes of water available to each agency are ultimately dependent on the certified production of local supplies throughout Western's import agency region. The final allocation will be reconciled at the completion of each fiscal year during which a water allocation is in place.

Shortage Level 7: Calculations Spreadsheet

	BOX SPRINGS	CORONA	EAGLE VALLEY	EVMWD	LLWD	MWD	NORCO	RANCHO	WESTERN	TOTAL	
BASE PERIOD DEMAND											
Base Period Import Supplies (AVG FY13 & FY14)	86	15,518	514	19,214	3,074	11	93	18,029	19,060	75,599	
Base Period Local Supplies (AVG FY13 & FY14)	295	19,177	0	7,832	0	0	8,651	10,562	6,136	52,653	
Base Period Total Demand	380	34,696	514	27,047	3,074	11	8,743	28,591	25,196	128,252	
ALLOCATION YEAR DEMAND ADJUSTMENT											
Base Period Average Population	3,300	158,611	0	139,599	19,962	0	27,063	24,742	94,807	468,083	
% of growth	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	
Allocation Year Population	3,337	160,390	0	141,165	20,185	0	27,367	25,019	95,871	473,334	
GPCD Applied to Growth	104	159	0	159	138	0	159	159	159	159	
Demand Growth	4.29	317.71	0.00	279.63	34.62	0.00	54.21	49.56	189.91	938.00	
LESS Growth in Conservation & Recycling	3.26	297.17	0.00	231.66	26.33	0.00	74.89	244.89	215.81	1094.00	
Adjusted Allocation Year Demand	381	34,716	514	27,094	3,082	11	8,722	28,396	25,170	128,096	
ALLOCATION YEAR IMPORT DEMAND											
Allocation Year Local Supplies (FY2014)	292	20,012	0	10,466	0	0	8,543	10,571	5,523	55,407	
Allocation Year Imported Demand	89	14,704	514	16,628	3,082	11	179	17,825	19,647	72,689	
IMPORT MINIMUM ALLOCATION											
Import Minimum Percentage	47.5%	47.5%	47.5%	47.5%	47.5%	47.5%	47.5%	47.5%	47.5%	47.5%	
Import Minimum Allocation	42.5	6,984.4	244.0	7,898.5	1,464.0	5.4	85.2	8,466.7	9,332.6	34,527.2	
RETAIL IMPACT ADJUSTMENT CREDIT¹											
Dependence on Metropolitan	23%	42%	100%	61%	100%	100%	2%	63%	78%	57%	
Retail Impact Adjustment Allocation	4.1%	7.4%	17.5%	10.7%	17.5%	17.5%	0.4%	11.0%	13.7%	9.9%	
Retail Impact Adjustment CREDIT	3.7	1,089.9	89.9	1,785.9	539.4	2.0	0.6	1,958.1	2,683.9	7,218.4	
Import Allocation with Retail Credit	46.2	8,074.3	333.9	9,684.4	2,003.4	7.4	85.8	10,424.8	12,016.4	41,745.6	
DEMAND HARDENING CREDIT²											
<p>1. The MWD Retail Impact Adjustment Credit, when applied to the individual water agencies within Western's general service area, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such the amount of water over allocated is subtracted from the total Demand Hardening Credit.</p> <p>2. The MWD Conservation Demand Hardening Credit methodology, when applied to the various GPCD values and GPCD changes at the local level with significantly lower water demands, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such, the wholesale Demand Hardening Credit has been divided among the urban retail water suppliers in proportion to the base period demand for imported water relative to the total imported water demand for all urban retail water suppliers.</p>										Base GPCD Allocation Year GPCD Change in GPCD Acre-Foot Change Regional Shortage Percentage GPCD Percent Reduction	362 242 120 63,837 35% 33.3%
Demand Hardening Credit	24	4,297	0	5,320	851	0	26	4,992	5,278	21,723	
TOTAL DAP IMPORT ALLOCATION											
Total DAP Allocation	70	12,371	334	15,005	2,855	7	111	15,417	17,294	63,469	

The table above illustrates the calculation of the estimated import water supply available to each water supplier within Western's service area during DAP Shortage Level 7. All values are estimates as the actual volumes of water available to each agency are ultimately dependent on the certified production of local supplies throughout Western's import agency region. The final allocation will be reconciled at the completion of each fiscal year during which a water allocation is in place.

Shortage Level 8: Calculations Spreadsheet

	BOX SPRINGS	CORONA	EAGLE VALLEY	EVMWD	LLWD	MWD	NORCO	RANCHO	WESTERN	TOTAL	
BASE PERIOD DEMAND											
Base Period Import Supplies (AVG FY13 & FY14)	86	15,518	514	19,214	3,074	11	93	18,029	19,060	75,599	
Base Period Local Supplies (AVG FY13 & FY14)	295	19,177	0	7,832	0	0	8,651	10,562	6,136	52,653	
Base Period Total Demand	380	34,696	514	27,047	3,074	11	8,743	28,591	25,196	128,252	
ALLOCATION YEAR DEMAND ADJUSTMENT											
Base Period Average Population	3,300	158,611	0	139,599	19,962	0	27,063	24,742	94,807	468,083	
% of growth	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	
Allocation Year Population	3,337	160,390	0	141,165	20,185	0	27,367	25,019	95,871	473,334	
GPCD Applied to Growth	104	159	0	159	138	0	159	159	159	159	
Demand Growth	4.29	317.71	0.00	279.63	34.62	0.00	54.21	49.56	189.91	938.00	
LESS Growth in Conservation & Recycling	3.26	297.17	0.00	231.66	26.33	0.00	74.89	244.89	215.81	1094.00	
Adjusted Allocation Year Demand	381	34,716	514	27,094	3,082	11	8,722	28,396	25,170	128,096	
ALLOCATION YEAR IMPORT DEMAND											
Allocation Year Local Supplies (FY2014)	292	20,012	0	10,466	0	0	8,543	10,571	5,523	55,407	
Allocation Year Imported Demand	89	14,704	514	16,628	3,082	11	179	17,825	19,647	72,689	
IMPORT MINIMUM ALLOCATION											
Import Minimum Percentage	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	40.0%	
Import Minimum Allocation	35.8	5,881.6	205.5	6,651.4	1,232.9	4.6	71.7	7,129.9	7,859.0	29,075.5	
RETAIL IMPACT ADJUSTMENT CREDIT¹											
Dependence on Metropolitan	23%	42%	100%	61%	100%	100%	2%	63%	78%	57%	
Retail Impact Adjustment Allocation	4.7%	8.5%	20.0%	12.3%	20.0%	20.0%	0.4%	12.6%	15.6%	11.3%	
Retail Impact Adjustment CREDIT	4.2	1,245.6	102.7	2,041.1	616.4	2.3	0.7	2,237.8	3,067.3	8,249.6	
Import Allocation with Retail Credit	40.0	7,127.2	308.2	8,692.4	1,849.3	6.9	72.5	9,367.7	10,926.3	37,325.1	
DEMAND HARDENING CREDIT²											
<p>1. The MWD Retail Impact Adjustment Credit, when applied to the individual water agencies within Western's general service area, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such the amount of water over allocated is subtracted from the total Demand Hardening Credit.</p> <p>2. The MWD Conservation Demand Hardening Credit methodology, when applied to the various GPCD values and GPCD changes at the local level with significantly lower water demands, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such, the wholesale Demand Hardening Credit has been divided among the urban retail water suppliers in proportion to the base period demand for imported water relative to the total imported water demand for all urban retail water suppliers.</p>										Base GPCD Allocation Year GPCD Change in GPCD Acre-Foot Change Regional Shortage Percentage GPCD Percent Reduction	362 242 120 63,837 40% 33.3%
Demand Hardening Credit	26	4,768	0	5,904	945	0	28	5,540	5,857	24,137	
TOTAL DAP IMPORT ALLOCATION											
Total DAP Allocation	66	11,896	308	14,596	2,794	7	101	14,907	16,783	61,462	

The table above illustrates the calculation of the estimated import water supply available to each water supplier within Western's service area during DAP Shortage Level 8. All values are estimates as the actual volumes of water available to each agency are ultimately dependent on the certified production of local supplies throughout Western's import agency region. The final allocation will be reconciled at the completion of each fiscal year during which a water allocation is in place.

Shortage Level 9: Calculations Spreadsheet

	BOX SPRINGS	CORONA	EAGLE VALLEY	EVMWD	LLWD	MWD	NORCO	RANCHO	WESTERN	TOTAL	
BASE PERIOD DEMAND											
Base Period Import Supplies (AVG FY13 & FY14)	86	15,518	514	19,214	3,074	11	93	18,029	19,060	75,599	
Base Period Local Supplies (AVG FY13 & FY14)	295	19,177	0	7,832	0	0	8,651	10,562	6,136	52,653	
Base Period Total Demand	380	34,696	514	27,047	3,074	11	8,743	28,591	25,196	128,252	
ALLOCATION YEAR DEMAND ADJUSTMENT											
Base Period Average Population	3,300	158,611	0	139,599	19,962	0	27,063	24,742	94,807	468,083	
% of growth	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	
Allocation Year Population	3,337	160,390	0	141,165	20,185	0	27,367	25,019	95,871	473,334	
GPCD Applied to Growth	104	159	0	159	138	0	159	159	159	159	
Demand Growth	4.29	317.71	0.00	279.63	34.62	0.00	54.21	49.56	189.91	938.00	
LESS Growth in Conservation & Recycling	3.26	297.17	0.00	231.66	26.33	0.00	74.89	244.89	215.81	1094.00	
Adjusted Allocation Year Demand	381	34,716	514	27,094	3,082	11	8,722	28,396	25,170	128,096	
ALLOCATION YEAR IMPORT DEMAND											
Allocation Year Local Supplies (FY2014)	292	20,012	0	10,466	0	0	8,543	10,571	5,523	55,407	
Allocation Year Imported Demand	89	14,704	514	16,628	3,082	11	179	17,825	19,647	72,689	
IMPORT MINIMUM ALLOCATION											
Import Minimum Percentage	32.5%	32.5%	32.5%	32.5%	32.5%	32.5%	32.5%	32.5%	32.5%	32.5%	
Import Minimum Allocation	29.1	4,778.8	167.0	5,404.3	1,001.7	3.7	58.3	5,793.0	6,385.4	23,623.9	
RETAIL IMPACT ADJUSTMENT CREDIT¹											
Dependence on Metropolitan	23%	42%	100%	61%	100%	100%	2%	63%	78%	57%	
Retail Impact Adjustment Allocation	5.3%	9.5%	22.5%	13.8%	22.5%	22.5%	0.5%	14.1%	17.6%	12.8%	
Retail Impact Adjustment CREDIT	4.7	1,401.3	115.6	2,296.2	693.5	2.6	0.8	2,517.5	3,450.7	9,280.7	
Import Allocation with Retail Credit	33.8	6,180.1	282.5	7,700.4	1,695.2	6.3	59.1	8,310.5	9,836.1	32,904.6	
DEMAND HARDENING CREDIT²											
<p>1. The MWD Retail Impact Adjustment Credit, when applied to the individual water agencies within Western's general service area, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such the amount of water over allocated is subtracted from the total Demand Hardening Credit.</p> <p>2. The MWD Conservation Demand Hardening Credit methodology, when applied to the various GPCD values and GPCD changes at the local level with significantly lower water demands, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such, the wholesale Demand Hardening Credit has been divided among the urban retail water suppliers in proportion to the base period demand for imported water relative to the total imported water demand for all urban retail water suppliers.</p>										Base GPCD Allocation Year GPCD Change in GPCD Acre-Foot Change Regional Shortage Percentage GPCD Percent Reduction	362 242 120 63,837 45% 33.3%
Demand Hardening Credit	29	5,240	0	6,488	1,038	0	31	6,087	6,436	26,550	
TOTAL DAP IMPORT ALLOCATION											
Total DAP Allocation	63	11,420	283	14,188	2,733	6	90	14,398	16,272	59,455	

The table above illustrates the calculation of the estimated import water supply available to each water supplier within Western's service area during DAP Shortage Level 9. All values are estimates as the actual volumes of water available to each agency are ultimately dependent on the certified production of local supplies throughout Western's import agency region. The final allocation will be reconciled at the completion of each fiscal year during which a water allocation is in place.

Shortage Level 10: Calculations Spreadsheet

	BOX SPRINGS	CORONA	EAGLE VALLEY	EVMWD	LLWD	MWD	NORCO	RANCHO	WESTERN	TOTAL	
BASE PERIOD DEMAND											
Base Period Import Supplies (AVG FY13 & FY14)	86	15,518	514	19,214	3,074	11	93	18,029	19,060	75,599	
Base Period Local Supplies (AVG FY13 & FY14)	295	19,177	0	7,832	0	0	8,651	10,562	6,136	52,653	
Base Period Total Demand	380	34,696	514	27,047	3,074	11	8,743	28,591	25,196	128,252	
ALLOCATION YEAR DEMAND ADJUSTMENT											
Base Period Average Population	3,300	158,611	0	139,599	19,962	0	27,063	24,742	94,807	468,083	
% of growth	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	1.12%	
Allocation Year Population	3,337	160,390	0	141,165	20,185	0	27,367	25,019	95,871	473,334	
GPCD Applied to Growth	104	159	0	159	138	0	159	159	159	159	
Demand Growth	4.29	317.71	0.00	279.63	34.62	0.00	54.21	49.56	189.91	938.00	
LESS Growth in Conservation & Recycling	3.26	297.17	0.00	231.66	26.33	0.00	74.89	244.89	215.81	1094.00	
Adjusted Allocation Year Demand	381	34,716	514	27,094	3,082	11	8,722	28,396	25,170	128,096	
ALLOCATION YEAR IMPORT DEMAND											
Allocation Year Local Supplies (FY2014)	292	20,012	0	10,466	0	0	8,543	10,571	5,523	55,407	
Allocation Year Imported Demand	89	14,704	514	16,628	3,082	11	179	17,825	19,647	72,689	
IMPORT MINIMUM ALLOCATION											
Import Minimum Percentage	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	25.0%	
Import Minimum Allocation	22.4	3,676.0	128.4	4,157.1	770.5	2.9	44.8	4,456.2	4,911.9	18,172.2	
RETAIL IMPACT ADJUSTMENT CREDIT¹											
Dependence on Metropolitan	23%	42%	100%	61%	100%	100%	2%	63%	78%	57%	
Retail Impact Adjustment Allocation	5.9%	10.6%	25.0%	15.3%	25.0%	25.0%	0.5%	15.7%	19.5%	14.2%	
Retail Impact Adjustment CREDIT	5.2	1,557.0	128.4	2,551.3	770.5	2.9	0.9	2,797.2	3,834.1	10,311.9	
Import Allocation with Retail Credit	27.6	5,233.0	256.9	6,708.4	1,541.1	5.7	45.8	7,253.4	8,746.0	28,484.2	
DEMAND HARDENING CREDIT²											
<p>1. The MWD Retail Impact Adjustment Credit, when applied to the individual water agencies within Western's general service area, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such the amount of water over allocated is subtracted from the total Demand Hardening Credit.</p> <p>2. The MWD Conservation Demand Hardening Credit methodology, when applied to the various GPCD values and GPCD changes at the local level with significantly lower water demands, results in individual agency allocations that exceed the total wholesale allocation from MWD. As such, the wholesale Demand Hardening Credit has been divided among the urban retail water suppliers in proportion to the base period demand for imported water relative to the total imported water demand for all urban retail water suppliers.</p>										Base GPCD Allocation Year GPCD Change in GPCD Acre-Foot Change Regional Shortage Percentage GPCD Percent Reduction	362 242 120 63,837 50% 33.3%
Demand Hardening Credit	32	5,711	0	7,071	1,131	0	34	6,635	7,015	28,964	
TOTAL DAP IMPORT ALLOCATION											
Total DAP Allocation	59	10,944	257	13,780	2,672	6	80	13,888	15,760	57,448	

The table above illustrates the calculation of the estimated import water supply available to each water supplier within Western's service area during DAP Shortage Level 10. All values are estimates as the actual volumes of water available to each agency are ultimately dependent on the certified production of local supplies throughout Western's import agency region. The final allocation will be reconciled at the completion of each fiscal year during which a water allocation is in place.

Appendix B Overview of the Metropolitan Water District Shortage Allocation Plan

Metropolitan's WSAP is the basis for allocation of shortages in supplies to member agencies should Metropolitan be unable to meet total firm demands. The first WSAP was prepared in 2007 due to dry conditions and uncertainty about future pumping operations from the State Water Project caused by fishery protection measures in the Sacramento-San Joaquin Bay-Delta. Since 2007, Metropolitan staff worked jointly with the member agency managers and staff to revise the plan. In December of 2014, the Metropolitan Board of Directors adopted the revisions as described later in this appendix.

The WSAP is based upon the 1999 Water Surplus and Drought Management Plan (WSDM Plan), which introduced the concept of using a base period to estimate water needs under an allocation.

Water Surplus and Drought Management Plan

The WSDM is the drought management plan that Metropolitan currently operates under which addresses both drought actions and water surplus actions. However, a water allocation methodology in the event "rationing" becomes necessary is not included in the WSDM Plan.

The following are the guiding principle, supporting principles and implementation goals of the WSDM Plan:

Guiding Principle

- Metropolitan will encourage storage of water during periods of surplus and work jointly with its Member Agencies to minimize the impacts of water shortages on the region's retail consumers and economy during periods of shortage.

Supporting Principles

- Maintain an ongoing coordinated effort among Metropolitan and its Member Agencies to encourage efficient water use and cost-effective local resource.
- Encourage local and regional storage during periods of surplus and use of storage during periods of shortage.
- Manage and operate Metropolitan's regional storage and delivery system in coordination with local facilities to capture and store surplus water in local groundwater and surface reservoirs.
- Arrange for secure sources of additional water from outside the region for use during periods of shortage.
- Call upon sources of additional water from outside the region and water stored locally to meet the needs of consumers and protect the economy during periods of shortage.

WSDM Plan Implementation Goals

- Avoid mandatory import water allocations to the extent practicable.
- Equitably allocate imported water on the basis of agencies' needs. Considerations to create an equitable allocation of imported water may include:
 - Impact on retail consumers and economy
 - Reclamation/Recycling
 - Conservation
 - Population and economic growth
 - Investment in local resources
 - Change and/or loss of local supply
 - Participation in Metropolitan's Non-firm (interruptible) Programs
 - Investment in Metropolitan's facilities
- Encourage storage of surplus supplies to mitigate shortages and improve water quality.⁹

Although an allocation method was not adopted, a draft plan was devised and specific concepts of an allocation are laid out in the WSDM Plan. These concepts include an overall policy objective of the allocation method as follows: "...to minimize the impacts to any one agency and the region as a whole. To meet that objective, the method of allocating firm imported supply will account for each agency's:

- demands on Metropolitan,
- local resources, and
- total retail demands."¹⁰

Water sales to an agency up to the amount allocated will be at the prevailing full service rate. Deliveries for water use from 100 to 102 percent of the allocation would be charged the prevailing full service rate plus \$175 per acre-foot (this cost is similar to the cost of Governors Water Bank water offered for sale in the 1987–92 drought). Water deliveries in excess of 102 percent of the target amount would be charged three times the full service rate.

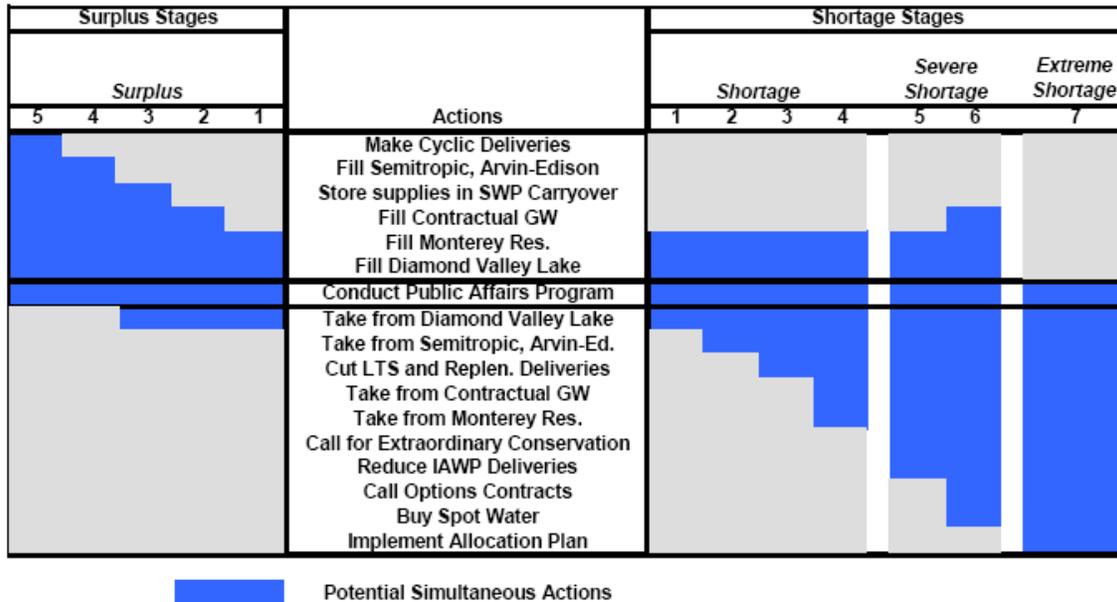
The WSDM Plan has four resource stages in which actions fall. These resource stages are:

- **Surplus:** Supplies are sufficient to allow Metropolitan to meet Full Service demands, make deliveries to all interruptible programs (replenishment, long-term seasonal storage, and agricultural deliveries), and deliver water to regional and local facilities for storage.
- **Shortage:** Supplies are sufficient to allow Metropolitan to meet Full Service demands and make partial or full deliveries to interruptible programs, sometimes using stored water and voluntary water transfers.
- **Severe Shortage:** Supplies are insufficient and Metropolitan is required to make withdrawals from storage, call on its water transfers, and possibly call for extraordinary drought conservation and reduce deliveries under the IAWP.
- **Extreme Shortage:** Supplies are insufficient and Metropolitan is required to allocate available imported supplies.¹¹

Based on the resource stage that Metropolitan is in, varying actions may occur. These actions are shown in Figure 1, below, as developed by Metropolitan. The matrix acts as a “framework.” Actual response would be based on conditions at the time of need.

Figure 3-1: Sequence of WSDM Plan Water Resource Management Steps

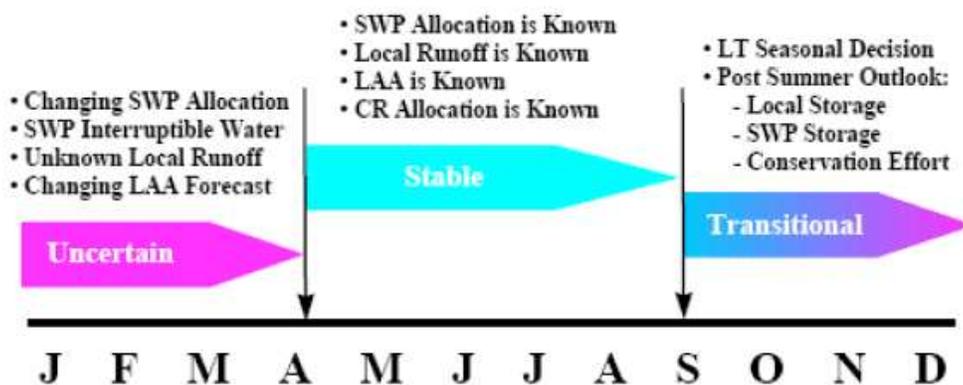
Figure 1: Sequence of WSDM Plan Water Resource Management Steps



The matrix is read from the center of the “Actions” column to the right or left. If Metropolitan is in a surplus stage, it would be read from the center up and to the left. If Metropolitan is in shortage stages, it would be read from the center down and to the right. Metropolitan’s General Manager has authority to act on all surplus actions and shortage actions 1 through 4. Metropolitan’s Board of Directors must approve actions 5 through 7.

The timeline below, from the WSDM Plan, shows a hypothetical shortage year.¹²

Figure 3-2: Shortage Year Timeline



From January through April, supplies are uncertain. The State Water Project (SWP) allocation is changing based on hydrology as well as the Los Angeles Aqueduct. From May through the end of September, supplies are known and actions have been taken in response to those known supplies. From October through December, a transitional period develops where there is uncertainty on the availability of supplies for the following period, and a decision is made on whether to offer long-term storage deliveries to member agencies as well as assess local storage, SWP storage and conservation efforts that have occurred.

A Drought Program Officer (DPO) will administer the public outreach programs. The DPO will be responsible for coordinating the various activities during a drought.

2007 Metropolitan Shortage Allocation Plan

Metropolitan's November 20, 2007 Board of Directors letter on the Draft Metropolitan Proposed Shortage Allocation Plan identifies the following central objectives of the Plan:

1. Address retail demands and wholesale water needs in the allocation year;
2. Adjust for factors such as population or economic growth, demand hardening, conservation savings, local investment, and the need for wholesale imported water; and
3. Employ an allocation formula that is as equitable as possible on the wholesale level while helping minimize hardships experienced by individuals and by the regional economy at the retail level.

The Plan employs a "two promise method" for supply allocation to ensure that:

1. On a retail level, shortages do not exceed the total Metropolitan percentage shortage (Retail Promise).
2. On a wholesale level, shortages do not exceed one and a half times the total Metropolitan percentage shortage (Wholesale Promise).

Key elements of the plan include:

- **Base Period** – Use of historical data is needed to estimate retail demands, local supplies, and wholesale water needs. The Plan uses a three-year average historical period as its base, with the initial period being 2004 through 2006. It is understood that this base period will be updated or adjusted as time progresses.
- **Growth Adjustment** – Estimates of retail demands need to be adjusted for growth that occurred between an allocation year and the base period. The Proposal uses county-level estimates of average annual growth in population as a proxy for member agency growth. Agencies will also have a choice to use a weighted average of population and job growth instead of just population.
- **Local Supply Adjustment** – Estimates of local supplies need to be adjusted for gains, losses, and extraordinary increases. These adjustments are critical to having reasonable estimates of total retail water needs.

- **Demand Hardening** – The Plan recognizes that significant increases in non-potable recycling and conservation savings devices can harden demands, and make additional reductions in water use more difficult to achieve. To address hardening due to non-potable recycling, non-potable recycling deliveries and the associated demands are not included in the allocation formula, thereby making all elements of the plan applicable to potable water uses only. To address hardening due to conservation, the Plan provides a credit based on the amount of conservation savings within a member agency and the regional shortage level declared by Metropolitan.
- **Depth of Shortage** – The Plan treats shallow shortages, defined as regional shortages up to ten percent, differently than deeper shortages. In shallow shortages, reductions in Metropolitan supplies will be done on an across-the-board basis, with adjustments for conservation demand hardening. This means that severely disparate impacts at a retail level are not addressed until regional shortages are greater than ten percent. At that point, the Plan employs an allocation formula that is equitable on the wholesale level while helping to minimize impacts to the regional economy from disparate shortages at the retail level.

Allocation Procedure

The shortage allocation formula has been developed for ten shortage levels from 5 to 50 percent.

1	5%	92.50%	0.00%	30%
2	10%	85.00%	0.00%	30%
3	15%	77.50%	7.50%	40%
4	20%	70.00%	10.00%	50%
5	25%	62.50%	12.50%	75%
6	30%	55.00%	15.00%	90%
7	35%	47.50%	17.50%	100%
8	40%	40.00%	20.00%	100%
9	45%	32.50%	22.50%	100%
10	50%	25.00%	25.00%	100%

Allocation Period

The allocation period covers twelve consecutive months, from July of a given year through the following June. This period was selected by Metropolitan so as to minimize the impacts of varying SWP allocations. It was also selected to provide member agencies with sufficient time to implement their outreach strategies and rate modifications.

Setting the Regional Shortage Level

Metropolitan staff shall be responsible for recommending a Regional Shortage Level for Board consideration. The final recommendation shall be based on water supply availability and Metropolitan water supply management actions, storage, and transfer operations that are consistent with those outlined in the WSDM Plan adopted by the Board in 1999, and the monthly status reports provided to the Water Planning and Stewardship Committee. Metropolitan’s Board of Directors, through the Water Planning and Stewardship Committee, shall be responsible for approving the final Regional Shortage Level at its April meeting. By the April meeting, the majority of the winter snowfall accumulation period will have passed, and will allow staff to make an allocation based on a stable supply picture. Barring

unforeseen large-scale circumstances, the shortage level will be put in place for the entire allocation period without change. This will allow a stable planning platform for the agencies.

Allocation Appeals Process

An appeals process will be necessary for the administration of any changes or corrections to an agency's allocation. Metropolitan shall designate an Appeals Liaison as the official point of contact for all information and inquiries regarding appeals. Basis for appeals claims can include but are not limited to:

- Adjusting erroneous historical data used in base year calculations
- Adjusting for unforeseen loss or gain in local supply
- Adjusting for extraordinary increases in local supply

Small appeals, defined as those that would change an agency allocation by a threshold of less than 10 percent and less than 5,000 acre-feet, shall be evaluated and approved or denied by Metropolitan staff determination. For process transparency, Metropolitan staff shall provide a report to the Board of Directors on all submitted appeals, including the basis for determination of the outcome of the appeal. Member Agencies may request to forward appeals that are denied by Metropolitan staff to the Board of Directors through the Water Planning and Stewardship Committee for final resolution. For large appeals, defined as those that would change an agency allocation by a threshold of 10 percent and at least 5,000 acre-feet, Metropolitan staff shall refer the appeal to the Board of Directors through the Water Planning and Stewardship Committee for approval.

Allocation Penalty Rates

Member agency allocations shall be enforced through a penalty rate structure. The recommended penalty rate structure is an ascending block structure. This structure provides a lower penalty for minor overuse of allocations, and a higher penalty for major overuse of allocations.

Changes since the 2007 Plan

The WSAP has undergone a series of updates since the plan was first developed in 2007 and implemented in 2009. The most recent update approved in December of 2014 includes the following changes:

- Replaced the WSAP Base Period with the Fiscal Years ending 2013 and 2014 and included a credit process for mitigating for reduced local demands as a result of restrictions in place during the new Base Period;
- Replaced the method for calculating Conservation Demand Hardening;
- Added a separate allocation for drought-impacted groundwater basins; and
- Replaced the WSAP Penalty Rates with an Allocation Surcharge based on the marginal costs of water conservation programs.

Updated Base Period

The WSAP “Base Period” is used to determine the retail consumptive water demands for each member agency. The Base Period retail demand is adjusted for growth in population, conservation savings, and non-potable recycling production occurring from the base period to the year in which an allocation is declared (Allocation Year). The recent update replaces the WSAP Base Period of 2004–2006 with Fiscal Years ending 2013 and 2014. The change provides a more up-to-date estimate of current retail consumptive water demand.

Western’s complete general water service area Base Period consumptive water demands at the time of Metropolitan Board adoption are summarized in the following table.

Local Supplies		MWD Purchases		Retail Demand		Allocation Year 2015		
FY 2012-2013	FY 2013-2014	FY 2012-2013	FY 2013-2014	FY 2012-2013	FY 2013-2014	Retail Demand	Local Supply	WSAP Baseline
186,497	183,858	68,457	75,910	260,997	259,768	261,793	183,858	77,934

Demand Hardening Methodology

Conservation Demand Hardening occurs at the retail water use level as consumers install more conservation saving devices and participating in available programs. In order to estimate conservation savings, each member agency will establish a historical baseline GPCD calculated in a manner consistent with California Senate Bill SBx7-7. Reductions from the baseline GPCD to the Allocation Year would be the basis used to calculate the equivalent conservation savings in acre-feet. The Conservation Demand Hardening credit will be based on an initial 10 percent of the GPCD-based Conservation savings plus an additional 5 percent for each level of Regional Shortage set by the Board of Directors during implementation of the WSAP. The credit will also be adjusted for:

- overall percentage reduction in retail water demand, and
- Western’s dependence on Metropolitan.

This provides a base demand hardening credit equal to 10 percent of conservation savings and increases the credit as deeper shortages occur, which is when conservation demand hardening has a bigger impact on the retail consumer. The credit also increases based on the percentage of an agency’s demand that was reduced through conservation. This accounts for increased hardening that occurs as increasing amounts of conservation are implemented. Lastly, the credit is scaled to the member agency’s dependence on Metropolitan to ensure that credits are being applied to the proportion of water demand that is being affected by reductions in Metropolitan supply.

Separate Allocation for Drought-Impacted Groundwater Basins

Groundwater basins help provide vital local supplies that can buffer the region from short-term drought impacts. Longer droughts can result in reductions to the many sources of water that replenish groundwater basins, resulting in lower basin levels and potential impacts to the overlying consumptive demands. Limited imported deliveries under these conditions may help avoid impacts to the basins that may be drawn out of their normal operating range or subject to water quality or regulatory impacts. Metropolitan provides a limited allocation for drought impacted groundwater basins based on the following framework:

- Metropolitan staff will meet with a requesting member agency and the appropriate groundwater basin manager to document whether the basin is in one of the following conditions:
 - Groundwater basin overdraft conditions that will result in water levels being outside normal operating ranges during the WSAP allocation period; or
 - Violations of groundwater basin water quality and/or regulatory parameters that would occur without imported deliveries.
- Metropolitan will provide an allocation based on the verified need for groundwater replenishment. The allocation would start with a member agency's ten-year average purchases of imported groundwater replenishment supplies (excluding years in which deliveries were curtailed). The amount would then be reduced by the declared WSAP Regional Shortage Level (5 percent for each Regional Shortage Level).
- Any allocation provided under this provision for drought impacted groundwater basins is intended to help support and maintain groundwater production for consumptive use. As such, a member agency receiving an allocation under this provision will be expected to maintain groundwater production levels equivalent to the average pumping in the Base Period. Any adjustments to a member agency's M&I allocation due to lower groundwater production would be reduced by deliveries made under this provision.
- Agencies for which this allocation does not provide sufficient supplies for the needs of the groundwater basin may use the WSAP Appeals Process to request additional supply (subject to Board approval). The appeal should include a Groundwater Management Plan that documents the need for additional supplies according to the following tenets:
 - Maintenance of groundwater production levels;
 - Maintenance of, or reducing the further decline of, groundwater levels;
 - Maintenance of key water quality factors/indicators;
 - Avoidance of permanent impacts to groundwater infrastructure or geologic features, and;
 - Consideration of severe and/or inequitable financial impacts.

Final amounts and allocations will be determined following consultation with groundwater basin managers and member agencies.

WSAP Penalty Rates

The Allocation Surcharge is based on the costs that Metropolitan and its member agencies are incurring to implement outdoor water use reductions through turf removal programs. The Allocation Surcharge is designed to provide a price signal based on the marginal conservation costs incurred to reduce water use in dry and shortage years. Any revenues collected from the Allocation Surcharge would be used to fund the implementation of the Turf Removal program or other similar programs designed to conserve water and reduce future demands.

- The Allocation Surcharge is based on Metropolitan's current cost of the turf removal program. Metropolitan is currently paying \$2 per square foot of turf removed. The estimated water

savings is 44 gallons per year for each square foot of turf removed for a period of ten years. Based on this savings rate, the estimated cost of the program is \$1,480 per acre-foot.

- Water use between 100 percent and 115 percent of WSAP supply allocations is charged with the Allocation Surcharge of \$1,480 per acre-foot. Water use greater than 115 percent of WSAP supply allocations is charged two times the Allocation Surcharge or \$2,960 per acre-foot. Two times the Allocation Surcharge provides funding for additional turf removal and conservation programs to conserve additional water and further reduce demand or, if appropriate, allow for a higher per square foot incentive payment.

Attachment 3 - Western Ordinance 385

ORDINANCE 385

ORDINANCE OF THE BOARD OF DIRECTORS OF
THE WESTERN MUNICIPAL WATER DISTRICT OF
RIVERSIDE COUNTY ADOPTING A DROUGHT
ALLOCATION PLAN

WHEREAS, Western Municipal Water District ("Western") was formed by the voters in 1954 for the purpose of importing water supplies from the Metropolitan Water District of Southern California ("Metropolitan"); and

WHEREAS, Western delivers these imported water supplies, from the State Water Project and the Colorado River Aqueduct and treated at Metropolitan's Henry J. Mills and Robert A. Skinner Filtration Plants, to communities on a wholesale basis to augment their own supplies; and

WHEREAS, Western serves a population of more than 70,000 people directly on a retail basis and over 880,000 people through its member agencies with State Water Project water and various locally-produced supplies; and

WHEREAS, Metropolitan has adopted the 1999 Water Surplus and Drought Management Plan ("WSDM Plan"). The guiding principle of the WSDM Plan is to encourage storage of water during periods of surplus and to work jointly with its member agencies, such as Western, to minimize impacts on the retail consumers and the economy during periods of shortage; and

WHEREAS, recent dry conditions and uncertainty about future pumping operations from the State Water Project have brought about the possibility that Metropolitan may not have access to the supplies necessary to meet total firm demands in the near future and may have to allocate shortages in supplies to its member agencies, such as Western. To prepare for this possibility, Metropolitan adopted an updated Water Supply Shortage Allocation Plan ("WSAP") in December of 2014, which

addresses the principles adopted pursuant to the WSDM Plan;
and

WHEREAS, Western desires to adopt this Ordinance in order to adopt a Drought Allocation Plan ("DAP") which is required in order to plan for, and implement, the reduced Metropolitan water deliveries which will result if certain provisions of the WSAP are implemented. The DAP identifies the method that will be used to allocate limited imported supplies among Western's retail agencies if Metropolitan implements said provisions of the WSAP; and

WHEREAS, on April 15, 2015, Western's Board of Directors adopted Resolution 2904, setting a public hearing regarding the proposed adoption of this Ordinance and the DAP;
and

WHEREAS, Water Code sections 71640 et seq. authorize Western to restrict the use of Western water during any emergency caused by drought, or other threatened or existing water shortage; and

WHEREAS, Water Code sections 375 et seq. provide that Western may, by a majority vote of the members of the Board of Directors after holding a public hearing upon notice, adopt and enforce a water conservation program, such as the DAP, to reduce the quantity of water used by its customers for the purpose of conserving the water supplies of Western; and

WHEREAS, Western has the power and authority to enact a water conservation program, such as the DAP, pursuant to Water Code sections 375 et seq. and 71640 et seq.

NOW, THEREFORE, BE IT ORDAINED BY THE BOARD OF DIRECTORS OF WESTERN MUNICIPAL WATER DISTRICT OF RIVERSIDE COUNTY AS FOLLOWS:

Section 1. Notice and Public Hearing. The Board of Directors conducted a public hearing on May 20, 2015 at 14205 Meridian Parkway, Riverside, California in order for customers to have the opportunity to be heard to protest against, and to present their respective needs to the Board of Directors regarding the proposed adoption of this Ordinance 385 and the DAP. Pursuant to Water Code section 376, notice of the public hearing was published on May 12, 2015 in the Riverside Press-Enterprise, a newspaper printed, published, and circulated within the area in which the subject water supply is distributed. Said notice was published at least seven (7) days prior to the date of the hearing;

Section 2. Adoption of Drought Allocation Plan.

(a) Western hereby adopts and authorizes the implementation of the DAP attached hereto as Exhibit "A" and incorporated herein by reference. The General Manager, or his/her designee, are hereby authorized and directed to immediately implement the applicable provisions of this Ordinance and the DAP upon the effective date hereof.

(b) The DAP includes a supply allocation methodology which was patterned after the Metropolitan WSAP methodology and in collaboration with Western's retail agencies. The goal of said methodology is to provide an equitable means of apportioning imported municipal and industrial supplies during periods when Metropolitan implements its WSAP. As further described in the DAP, Western staff and designated wholesale customer representatives have

collectively agreed to the allocation methodology described in the DAP.

(c) The Allocation Plan Implementation Elements shall be implemented at the time, and in the manner, as set forth in the DAP and therefore, shall not require any further action by Western's Board of Directors before being implemented by Western's General Manager, or his/her designee, as set forth in the DAP. For example, and not by way of limitation, it is anticipated that the allocation of imported supplies under the DAP shall be implemented at the time that Metropolitan allocates its supplies through its WSAP process. Should Metropolitan implement its WSAP, Western's General Manager, or his/her designee, will determine the appropriate shortage level, as set forth in the DAP, so that supplies allocated at the Western service area level are equal to or less than the Metropolitan allocation.

Section 3. Application of the DAP. The provisions of the DAP and this Ordinance shall apply to the allocation of water for retail municipal and industrial purposes among the following agencies:

- (a) Box Springs Mutual Water Company;
- (b) City of Corona;
- (c) City of Norco;
- (d) Eagle Valley Mutual Water Company;
- (e) Elsinore Valley Municipal Water District;
- (f) Lee Lake Water District;
- (g) Rancho California Water District;
- (h) Western Municipal Water District Retail Customers

Section 4. Severability. If any provision, section, subsection, sentence, clause, or phrase of this Ordinance or

the application of same to any person or set of circumstances is held to be unconstitutional, void, or invalid, such decision shall not affect the remaining portions of this Ordinance which shall remain in full force and effect, and all provisions of this Ordinance are declared to be severable for that purpose.

Section 5. Incompatible Provisions. To the extent any provision of this Ordinance is incompatible with or at variance with any other Western policy or rules and regulations, the provisions of this Ordinance shall be controlling, and all other Western policies and rules and regulations shall be interpreted to harmonize with and not change the provisions of this Ordinance.

Section 6. Exemption From California Environmental Quality Act. The Board of Directors determines that the adoption of the DAP and this Ordinance, for the purpose of addressing water shortages and allocation of supplies, are exempt from the requirements of the California Environmental Quality Act ("CEQA") pursuant to Section 15269(c) of the State CEQA Guidelines. Section 15269(c) provides that actions necessary to prevent or mitigate for an emergency are exempt from CEQA. The Board of Directors finds that the adoption of the DAP is necessary to mitigate for the emergency water shortages that may result in the near future if Metropolitan implements its WSAP. The Board of Directors hereby directs staff to prepare and file a Notice of Exemption within five (5) working days of adoption of this Ordinance.

Section 7. Effective Date. This Ordinance shall be effective immediately upon adoption and shall be presumed to continue in effect unless or until a contrary finding is made by applicable action of the Board of Directors. Within fifteen

(15) days from the date of adoption, a summary of this Ordinance shall be published one time in the Riverside Press-Enterprise with the names of those Board members voting for and against. A certified copy of this Ordinance shall be posted in the District offices along with the names of those Board members voting for and against.

Section 8. Prior Ordinances. This Ordinance shall supersede and otherwise control over the provisions of Ordinance 371. As of the effective date of this Ordinance 385, Ordinance 371 shall be of no further force or effect.

Section 9. Incorporation of Recitals. All of the foregoing Recitals are true and correct and the Board of Directors so finds and determines. The Recitals set forth above are incorporated herein and made an operative part of this Ordinance.

ADOPTED AND APPROVED this 20th day of May, 2015 by the Board of Directors of the Western Municipal Water District of Riverside County.



DONALD D. GALLEANO
President

May 20, 2015

I HEREBY CERTIFY that the foregoing is a full, true, and correct copy of Ordinance 385 adopted by the Board of Directors of Western Municipal Water District of Riverside County at a duly-noticed regular meeting held on May 20, 2015.


THOMAS D. EVANS
Secretary-Treasurer

Attachment 4 - Western Ordinance 394

ORDINANCE 394

AN ORDINANCE OF THE WESTERN MUNICIPAL
WATER DISTRICT OF RIVERSIDE COUNTY
ESTABLISHING AN UPDATED RETAIL
CUSTOMER WATER SUPPLY SHORTAGE
CONTINGENCY RESPONSE PROGRAM

WHEREAS, California Constitution article X, section 2 and California Water Code section 100 provide that because of conditions prevailing in the State of California, it is the declared policy of the State that the general welfare requires that the water resources of the State shall be put to beneficial use to the fullest extent of which they are capable, the waste or unreasonable use of water shall be prevented, and the conservation of such waters is to be exercised with a view to the reasonable and beneficial use thereof in the interest of the people and the public welfare; and

WHEREAS, pursuant to California Water Code section 106, it is the declared policy of the State that the use of water for domestic use is the highest use of water and that the next highest use is for irrigation; and

WHEREAS, pursuant to California Water Code section 375, a District may adopt and enforce a water conservation program to reduce the quantity of water used by persons within its jurisdiction for the purpose of conserving the water supplies of the city; and

WHEREAS, pursuant to California Water Code section 71610.5, a District may undertake a water conservation program to reduce water use and may require, as a condition of new service, that reasonable water-saving devices and water reclamation devices be installed to reduce water use; and

WHEREAS, pursuant to California Water Code section 71640, a District may restrict the use of District water during any emergency caused by drought, or other threatened or existing water shortage, and may prohibit the waste of District water or the use of District water during such periods for any purpose other than those that the District determines to be necessary. A District may also prohibit use of District water during such periods for specific uses which it finds to be nonessential. Pursuant to Water Code section 71641, a District may prescribe and define by ordinance the restrictions, prohibitions, and exclusions referred to in section 71640; and

WHEREAS Western Municipal Water District's (Western) Board of Directors recognizes continued long-term challenges to the region and the state. Western's service area's Mediterranean climate typically exhibits hot, dry summers and mild, wet winters. Annual precipitation totals vary substantially from year to year, averaging 10.24 to 12.06 inches depending on the region. Climate change impacts are predicted to increase the uncertainty of water supplies. Additionally, regulatory restrictions on pumping from the Bay-Delta region affecting State Water Project (SWP) deliveries will continue to impact Western's supply reliability. Western relies heavily on imported water supplies, obtaining approximately up to 60 percent of its total supply from Metropolitan Water District of Southern California (MWD); and

WHEREAS, because of the prevailing conditions in the state and the declared policy of the State that Western manage its water resources for the general welfare to ensure their beneficial use to the fullest extent of which they are capable, Western hereby finds and determines that it is necessary and appropriate to adopt, implement, and enforce a Water Supply Shortage Contingency Response Program (the Program) to reduce the quantity of water used by consumers within Western's retail service area to ensure

that there is sufficient water for human consumption, sanitation, and fire protection; and

WHEREAS, pursuant to California Water Code section 350, Western's Board of Directors is authorized to declare a Water Shortage Emergency to prevail within its jurisdiction when it finds and determines that Western will not be able to or cannot satisfy the ordinary demands and requirements of water consumers without depleting Western's water supply to the extent that there would be insufficient water for human consumption, sanitation, and fire protection, and as more fully set forth in this Ordinance; and

WHEREAS, the Board of Directors hereby finds and determines that in the event Western determines that it is necessary to declare that a Water Shortage Emergency exists, Western will be authorized pursuant to this Ordinance to implement supply shortage response measures to regulate water consumption activities within the retail service area and ensure that the water delivered is put to beneficial use for the greatest public benefit, with particular regard to domestic use, including human consumption, sanitation, and fire protection, and that the waste or unreasonable use of water is prevented; and

WHEREAS, the Board of Directors is authorized and hereby finds and determines that it is necessary to prescribe and define by ordinance restrictions, prohibitions, and exclusions for the use of water during a threatened or existing water shortage and adopt and enforce a water supply shortage contingency response program to: (i) prohibit the waste of Western water or the use of Western water during such period; (ii) prohibit use of water during such periods for specific uses which Western may from time to time find nonessential; and (iii) reduce and restrict the quantity of water used by Persons within Western; and

WHEREAS, the Board of Directors hereby finds and determines that Western shall: (i) implement water supply shortage response

measures; (ii) regulate the water consumption activities of Persons within Western for the purposes of conserving and protecting Western's water supplies, reducing the quantity of water consumed, and deterring and preventing the waste or unreasonable use or unreasonable method of use of valuable water resources; and (iii) establish and impose fines and/or penalties as set forth herein to accomplish these purposes, discourage water or unreasonable use of water during a declared water shortage, and pay for Western's water conservation and regulatory program; and

WHEREAS, the Board of Directors hereby finds that Western's Tiered water budget-based rate structure is an effective method of managing demand through price signals and eliminating inefficient usage while maintaining revenue stability and proportionately allocate the costs of service to those who place the greatest demands on Western's water system and limited water supplies; and

WHEREAS, the Board of Directors hereby finds and determines that it is desirable to adopt the Program in order to codify the rules and regulations governing its actions, and the actions of Persons using and consuming water within Western, particularly during declared water shortages and water shortage emergencies, to protect the general welfare and Western's water supplies, and to reduce water consumption all in accordance with the declared policies and laws of the State; and

WHEREAS, the Board of Directors hereby further finds and determines that this Ordinance and the Program set forth herein are in the public interest and serve the public purpose of Western; and

WHEREAS, the California Urban Water Management Planning Act, Water Code Section 10610 et seq. (the Act) mandates that every urban supplier of water providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually, prepare and adopt, in accordance with prescribed

requirements, a Water Shortage Contingency Plan (WSCP) as part of its Urban Water Management Plan; and

WHEREAS, in accordance with the Act, Western adopted its WSCP, a detailed plan for how Western intends to act or respond to water shortage conditions on June 16, 2021 and adopted a revised WSCP on January 19, 2022; and

WHEREAS, this Program is one legal authority that enables Western to implement its WSCP; and

WHEREAS, in accordance with applicable law, a Notice of a Public Hearing regarding Western's Program was published within the jurisdiction of Western on December 15 and 22, 2021 for English language and on December 17 and 24, 2021 for Spanish language; and

WHEREAS, in accordance with applicable law, a public hearing was held on January 19, 2022 at 9:30 a.m., or soon thereafter, in the boardroom of the offices of the Western Municipal Water District of Riverside County, 14205 Meridian Parkway, Riverside, California 92518 in order to provide members of the public and other interested entities with the opportunity to be heard in connection with proposed adoption of the Program and issues related thereto; and

WHEREAS, at the Hearing held on January 19, 2022, the Board heard and considered all oral testimony, written materials, and written protests concerning the proposed Program, and at the close of the Hearing, Western did not receive written protests against the establishment of and imposition of the proposed Water Shortage Contingency Response Program and associated Drought Fines; and

WHEREAS, due to the fiscal impacts referenced above, the Board of Directors has determined that it is in the best interests of Western to adopt the proposed Water Supply Shortage Contingency

Response Program identified herein and as more particularly described and set forth herein; and

NOW, THEREFORE, BE IT ORDAINED by the Board of Directors of the Western Municipal Water District of Riverside County as follows:

Section 1. Recitals

The Board of Directors hereby finds and determines that the above recitals are true and correct and incorporated herein.

Section 2. Findings and intent

(A) The Board of Directors finds and determines that because of the prevailing conditions in the state, it is necessary and appropriate for Western to adopt, implement, and enforce this Program to reduce the quantity of water used by Persons within Western to ensure that there is sufficient water for human consumption, sanitation, and fire protection. Western further finds and determines that during periods of drought, water shortages, and water shortage emergencies the general welfare requires that Western maximize the beneficial use of its available water resources to the extent that it is capable, and that the waste or unreasonable use, or unreasonable method of use of water shall be prevented and the conservation of water is to be extended with the view to the reasonable and beneficial use thereof in the interests of the people of Western and for the public health, safety, and welfare.

(B) This Ordinance adopts the Program which establishes water waste restrictions, supply shortage response measures, regulations, Drought Fines, and administrative fines and/or penalties to be implemented during declared water supply shortage stages.

(C) This Ordinance adopts the Program which establishes six (6) water supply shortage stages and supply shortage response measures to be implemented by Western, with increasing

restrictions on water use for water waste in response to decreasing water supplies and/or worsening drought conditions, and administrative fines and drought penalties for violating this Ordinance and the Program in relation thereto and as described herein.

(D) The water supply shortage stages may be caused by, but are not limited to, any or all of the following circumstances or events:

- (1) A regional water supply shortage exists;
- (2) Delivery infrastructure such as storage reservoirs, pipes, pumps, filtration devices or groundwater wells are inoperable or unusable (such as by power outages, mechanical failure, or contamination);
- (3) Alternative water supplies are limited or unavailable;
- (4) Groundwater levels or groundwater quality is approaching levels which may require augmentation of the groundwater basin or other actions necessary to protect the groundwater basin as prescribed by the California Department of Water Resources, the Regional Water Quality Control Board, Riverside County, or some other regulatory body;
- (5) MWD's Water Shortage Contingency Plan stages, and the Water Surplus and Drought Management Plan stages and the MWD Water Supply Allocation Plan stages and corresponding actions have been implemented; or
- (6) a statewide drought declaration.

Section 3. Purpose and scope

(A) The purposes of the provisions of this Ordinance and Program are to assure the highest beneficial use of Western water supplies and to provide sufficient water supplies to meet

the basic needs of human consumption, sanitation, and fire protection within the District's direct retail service area.

(B) This Ordinance is not intended to repeal, abrogate, annul, impair or in any way interfere with the free use of property by covenant, deed, or other private agreement or with restrictive covenants running with the land to which Western provides water services.

(C) The provisions of this Ordinance shall apply to all Persons within Western's direct retail service area and all property served in a retail capacity wherever situated.

(D) Nothing in this Ordinance is intended to affect or limit the ability of Western to respond to an emergency, including an emergency that affects the ability of Western to supply water.

Section 4. Definitions

For the purposes of this Ordinance, the following words, terms, and phrases shall have the following meanings:

"Appellant" means the Person appealing a decision of the Approving Authority, General Manager or other Western official.

"Approving Authority" means the General Manager of Western, or his or her designee, charged with approving or denying written applications for Relief.

"Base Period" means a period of time similar to a Customer's Billing Period in both fiscal year 2019-2020 and fiscal year 2020-2021. For the purposes of determining historical water use for a Billing Period, the average is calculated using the similar Billing Period from both fiscal year 2019-2020 and fiscal year 2020-2021.

"Billing Period" means the billing period in which a Customer's water use is measured for purposes of calculating the amount of the water service fees that shall be collected for the water service provided.

"Billing Tier" or "Tier" means the volume of water within a defined and adopted rate.

"Board of Directors" means the Board of Directors of Western Municipal Water District.

"District" means the Western Municipal Water District.

"Drought Fine" means an administrative fine and/or penalty for violation of this Ordinance and the Program, as described in more detail below in Section 15 herein.

"Enforcement Officer" means any individual employed or otherwise charged by Western to inspect or enforce codes, ordinances, mandates, regulations, resolutions, rules or other laws adopted by the Board of Directors or other regulatory bodies.

"General Manager" means the General Manager of Western or his or her authorized designee.

"Immediate Emergency" means a breakage or failure of a dam, pump, pipeline or conduit, a disaster or other disruption of Western's water supply.

"Medical Adjustment" means an adjustment to the residential indoor water allocation based on medical needs. Medical adjustments must be approved by Western and are not subject to mandatory residential indoor water allocation reductions in any stage. Western will consider a request for medical adjustment at any time and at any stage. The adjustment shall be removed with any changes to the account holder.

"MWD" means the Metropolitan Water District of Southern California.

"Non-Potable Water" means water that is not of drinking water quality, but which may still be used for purposes other than for human consumption.

"Person" means any natural person, firm, joint venture, joint stock company, partnership, public or private association, club, company, corporation, business trust, organization, public

or private agency, government agency or institution, school district, college, university, any other user of water provided by the District, or the manager, lessee, agent, servant, officer or employee of any of them or any other entity which is recognized by law as the subject of rights or duties.

"Program" means the Water Supply Shortage Contingency Response Program adopted pursuant to this Ordinance.

"Property Owner" means the owner of a parcel whose name and address appears on the last Riverside County equalized secured property tax assessment roll, or in the case of any public entity, the State of California, or the United States, means the representative of that public entity at the address of that entity known to Western.

"Recycled Water" means municipal wastewater that has been treated to meet all applicable Federal, State and local standards for use in approved applications, including, but not limited to, agricultural and landscape irrigation.

"Relief" means excuse from compliance with the regulations and restrictions on water use contained in this Ordinance.

"State" means the State of California.

"Water Budget" means a Customer's total water billing allocation for indoor and outdoor water use. The specific indoor and outdoor allocation of water depends on the type of Customer (Customer sector) and the specific characteristics of the Customer's site.

"Water Customer" or "Customer" means a Person who, according to Western's records, receives water service to a parcel of property.

"Water Shortage Emergency" means a condition existing within Western in which the ordinary water demands and requirements of Persons within Western cannot be satisfied without depleting

Western's water supply to the extent that there would be insufficient water for human consumption, sanitation, and fire protection. A Water Shortage Emergency includes both an Immediate Emergency, in which Western is unable to meet current water needs of Persons within Western, as well as a threatened water shortage, in which Western determines that its supply cannot meet an increased future demand.

"Water Shortage Contingency Plan" or "WSCP" means the Plan developed by MWD as a guide for MWD's intended actions during water shortage conditions. It is meant to improve preparedness for droughts and other impacts on water supplies by describing the process used to address varying degrees of water shortages. The WSAP and WSDM Plans are referenced in MWD's WSCP.

"Water Supply Allocation Plan" or "WSAP" means the Plan developed by MWD to calculate member agencies' supply allocations should a shortage be declared.

"Water Surplus and Drought Management" Plan or "WSDM" means the 1999 Plan that MWD uses to direct its resource operations to ensure that shortage allocations of imported water supplies are not required.

"Western" means the Western Municipal Water District.

Section 5. Stage Implementation

(A) The General Manager shall monitor the projected supply of and demand for water within the retail water service area of Western during periods of a water shortage or supply shortage and shall recommend to the Board of Directors the extent of the demand reduction required through the implementation and/or termination of particular water supply shortage stages to prudently plan and supply water to water Customers. Thereafter, the Board of Directors may order the implementation or termination of the appropriate stage.

(B) The declaration of any stage beyond Stage 1 shall be made by resolution of the Board of Directors. Within ten (10) calendar days of the adoption of the resolution declaring the applicable stage, Western shall make a public announcement and provide notice of the applicable water supply shortage stage. Such declaration and notice shall provide the extent, terms, and conditions as well as the associated Drought Fines and other administrative fines respecting the use and consumption of water in accordance with the applicable water supply shortage stage as provided in this Ordinance. Upon such declaration and publication of such notice, due and proper notice shall be deemed to have been given to each and every Person supplied water within the District.

(C) The water supply shortage stage designated shall become effective immediately upon announcement.

(D) Except in the event of an Immediate Emergency, the declaration of a Water Shortage Emergency during any water supply shortage stage shall be made in accordance with California Water Code sections 350 *et seq.*

(E) Notwithstanding any other provision of this Ordinance, if an Immediate Emergency occurs and the Board of Directors cannot meet in time to act to protect the public interest, the General Manager is hereby authorized and directed to implement any necessary rules and regulations upon his or her written determination that Western cannot adequately supply water to meet the ordinary demands of water consumers, and that such implementation is necessary to protect the public health and safety.

(1) The General Manager's written determination of an Immediate Emergency shall be:

(a) filed with Western Board of Director's
Secretary;

(b) posted on Western's website;

(c) delivered to the Board of Directors; and
(d) subsequently considered by the Board of Directors at a general or special meeting for review, revocation, or ratification.

(2) The implementation of any rules and regulations during an Immediate Emergency shall take effect immediately upon making a posting of the determination of the Immediate Emergency on Western's website.

(3) The Board of Directors' meeting shall be held on the earliest date that a quorum of the Board of Directors is available. At the Board of Directors meeting, the General Manager shall update the Board of Directors on the severity and length of the Immediate Emergency.

Section 6. Stage 1 - Water Supply Watch - Water Use Efficiency is a Way of Life

(A) Stage 1 is also referred to as a "Water Supply Watch - Water Use Efficiency is a Way of Life" and applies during periods when Western is able to meet all of the water demands of its customers or when supplies are reduced by 10%. Stage 1 and the permanent prohibitions set forth herein shall be in effect at all times unless the Board of Directors otherwise declares that another stage is in effect pursuant to this Ordinance and such stage establishes more stringent prohibitions on the use of water during the particular stage.

Under Stage 1, customers are encouraged to use water efficiently and take advantage of Western's water use efficiency programs. Stage 1 also mandates the implementation of several permanent water waste prohibitions, even when there is no foreseeable threat of a water shortage. Water waste is in violation of California Law at any stage. California's water law and policy, Article X, Section 2 of the California Constitution, requires that all uses of the State's water be both reasonable and beneficial

and places a significant limitation on water rights by prohibiting the waste, unreasonable use, unreasonable method of use, or unreasonable method of diversion of water. The permanent prohibitions shall be continually in effect at all levels of water shortage declarations in addition to the requirements specific to each level. All of Western's water efficiency programs and water conservation regulations will be in full force and effect during Stage 1.

The permanent shortage response measures include:

(1) All plumbing leaks, improperly adjusted sprinklers, or other water conduits/fixtures that require repair or adjustment shall be corrected to the satisfaction of Western within 96 hours of customer notification by Western.

(2) When installing plumbing fixtures, use low-flow devices, except for those that require high-flow fixtures for health and/or sanitary reasons.

Outdoor Water Use

(3) All outdoor irrigation shall be maintained and adjusted to prevent water waste.

(4) All irrigators shall ensure automatic irrigation timers are adjusted according to changes in the weather.

(5) Watering of lawns and/or groundcovers and irrigating landscaping is permitted only between the hours of 8 p.m. and 8 a.m.

(6) Watering outdoor landscaped areas shall be avoided during measurable rain events and two days thereafter. A measurable rainfall event is determined to be precipitation that measures greater than 0.25 inches as recorded at the California Irrigation Management Information System (CIMIS) Station Number 44 for customers in or near the Riverside service area and CIMIS Station 62 for customers in or near the Murrieta and Rainbow service area. Measurement

information is available online at CIMIS website (www.cimis.water.ca.gov).

(7) Watering outdoor landscaped areas shall be avoided during significant wind events.

(8) No customer shall allow water to leave his or her property by drainage onto adjacent properties or public or private roadways or streets due to excessive irrigation and/or uncorrected leaks.

(9) When installing new landscaping, refer to the Water Use Classification of Landscape Species (WUCOLS). Plant low-water California Friendly® Landscapes. Non-functional turf areas are not recommended.

(10) All open hoses shall be equipped with automatic, positive shut-off nozzles.

(11) All swimming pools, spas, ponds, and fountains shall be equipped with re-circulating pumps.

(12) Where possible, install pool and spa covers to minimize water loss due to evaporation during non-operating days.

(13) Draining and refilling of private swimming pools is discouraged, unless necessary for health and safety or leak repair.

(14) The non-commercial washing of automobiles, trucks, trailers, boats, airplanes and other types of mobile equipment shall be done with a hand-held bucket or a hand-held hose equipped with an automatic, positive shut-off nozzle.

(15) No customer shall use water to wash down sidewalks, driveways, parking areas, tennis courts, patios, or other paved or hard surface areas, except to alleviate immediate fire or sanitation hazards, and then only by use of a hand-held bucket or similar container, a hand-held hose equipped

with an automatic, positive self-closing shut-off device, or a low-volume, high-pressure cleaning machine.

Construction

(16) Construction operations receiving water from a construction meter, hydrant meter, or water truck shall not use water for any purpose other than those required by regulatory agencies.

(17) Where possible, construction operations should utilize non-potable and recycled water for their purposes.

Commercial

(18) It is prohibited to install single-pass cooling systems in buildings requesting new water service. Single pass cooling equipment should either be modified to recirculate water or, if possible, should be eliminated.

(19) New commercial conveyor car washes and new commercial laundry systems should install recirculating water systems.

(20) Eating or drinking establishments, or other public places where food or drinks are sold, served, or offered for sale, should only provide drinking water upon specific request and are encouraged to use low-flow certified pre-rinse spray valves.

(21) Commercial lodging establishments shall provide an option not to launder linens daily. Commercial lodging establishments shall prominently display notice of this option in each guestroom using clear and easily understood language.

(22) Developers of commercial properties are urged to eliminate or not install non-functional turf and to install water-wise landscaping using native or drought-tolerant plants.

(23) No commercial property shall allow water to leave the property by drainage onto adjacent properties or public or private roadways or streets due to excessive irrigation and/or uncorrected leaks.

Homeowner Associations (HOAs)

(24) Homeowner Associations (HOAs), community service organizations, or similar entities are strongly discouraged from enforcing provisions of their rules and regulations that prohibit reducing or eliminating the watering of vegetation or lawns during a declared drought emergency.

(25) Western strongly encourages counties, cities, HOAs, and other enforcement agencies to suspend code enforcement and fines for brown turf areas and to otherwise comply with new state laws regarding limitations on such enforcement.

(26) HOAs shall eliminate irrigation runoff from residential and HOA common area landscapes. HOAs are strongly encouraged to adopt and enforce water use restrictions in their rules and regulations.

Section 7. Stage 2 - Water Supply Alert

(A) Stage 2 is also referred to as a "Water Supply Alert" and applies during periods when there is up to a 20% reduction in Western supplies. This may correlate to MWD's WSCP Stage 2.

(B) The objective of Stage 2 is to achieve a moderate reduction in water use through additional voluntary actions, enhanced outreach, and customer support programs, and may be adjusted depending on supply conditions via a Board-approved resolution.

(C) Voluntary conservation measures will be called upon during this stage. Western shall develop a public information campaign to provide customers with options for achieving the Stage

2 demand reduction goal. Western shall explore increased customer incentives for conservation measures.

The Stage 2 shortage response measures include:

(1) All plumbing leaks, improperly adjusted sprinklers, or other water conduits/fixtures that require repair or adjustment shall be corrected to the satisfaction of the Western within 72 hours of customer notification by Western.

Outdoor Water Use

(2) All irrigators should install a self-adjusting, weather-based, irrigation controller. Ensure the controller has a manual mode that will allow compliance with higher stages of this Program.

(3) All irrigators should tune-up irrigation systems by checking for and repairing leaks and damaged sprinklers.

(4) New development landscaping plans shall eliminate the installation of non-functional turf grass and shall use efficient irrigation devices where possible.

Indoor Water Use

(5) Customers should wash only full loads of laundry and/or dishes.

(6) Customers should install low-flow certified showerheads and shorten shower times.

(7) Customers should consider replacing older inefficient appliances with certified low-flow appliances.

Commercial

(8) Commercial customers will be encouraged to develop a Water Management Plan that mirrors the stages and reduction targets described in the Program.

(9) Commercial, institutional, industrial, and landscape customers, including but not limited to, parks, school grounds, highway medians, commercial landscaping, and golf courses are restricted to irrigation applications

between 8 p.m. and 6 a.m. These irrigators are advised to adjust automatic irrigation timers according to changing weather patterns and landscape requirements.

(10) Customers irrigating with recycled water need to provide signage on the site that conforms with recycled water use requirements and is clearly visible. Customers irrigating with recycled water are encouraged to develop a Water Management Plan that describes how water waste will be eliminated.

Section 8. Stage 3 - Water Supply Reduction - Targeting Unsustainable Use

(A) Stage 3 is also referred to as a "Water Supply Reduction - Targeting Unsustainable Use" stage. The intent of Stage 3 is to target and eliminate excessive water waste and water use in Western's "Unsustainable Use" category. Stage 3 applies during periods when Western supplies are reduced up to 30%. This may correlate to MWD's WSCP Stage 3.

(B) The objective of the measures undertaken in Stage 3 is to achieve a mandatory reduction of water system consumption by 10 percent.

(C) Potable water customers in areas directly served by Western that do not have Water Budgets shall reduce their water use by 10% from the Base Period.

(D) In Stage 3, Western seeks to eliminate Unsustainable water use (Tier 4). Customers with Unsustainable water use might be subject to enforcement under Section 15 of the Ordinance.

(E) Customers with dedicated landscape meters will be required to reduce by 15 percent.

(F) Commercial customers will be required to implement their respective stage in their Water Management Plan.

(G) The permanent prohibitions described in Stage 1 and 2 shall be continually in effect at this level of water shortage declaration in addition to the requirements specific to each level.

(H) Additional conservation measures will be called upon during this stage. Western shall develop a public information campaign to provide customers with options for achieving the Stage 3 demand reduction goal and complying with their applicable water allocation.

(I) Western shall explore enhanced customer incentives for conservation measures. These measures include but are not limited to landscape audits, weather-based irrigation controllers, toilets, washers, and turf replacement.

The Stage 3 shortage response measures include:

(1) All plumbing leaks, improperly adjusted sprinklers, or other water conduits/fixtures that require repair or adjustment shall be corrected to the satisfaction of Western within 48 hours of customer notification by the Western.

Outdoor Water Use

(2) Customers shall conduct a self-audit of their irrigation systems and eliminate overspray, leaks and breaks.

(3) Customers shall cut back irrigation runtimes by 15% using the Percent Adjust feature on their irrigation controller or limit lawn irrigation to no more than three days per week (during April through September) and no more than two days per week (during October through March). Customers with functional or recreational turf areas such as athletic fields, schools, and parks should attempt to reduce water use while still maintaining the health of their landscapes.

(4) Filling, refilling, or replenishing residential swimming pools, spas, ponds, streams, and artificial lakes is prohibited.

(5) Operation of any ornamental fountain or water feature, is prohibited. No water for decorative fountains or water features may be used, even if it has a recirculating system.

(6) Use of water for cooling mists is prohibited.

(7) Washing of personal vehicles at home (including autos, trucks, trailers, motor homes, boats or others) is prohibited.

Commercial

(8) Customers receiving water from Western who are engaged in commercial agricultural practices, whether for the purpose of crop production or growing of ornamental plants shall provide, maintain and use irrigation equipment and practices which are the most efficient possible. Upon the request of Western's General Manager, these persons may be required to prepare a plan describing their irrigation practices and equipment, including but not limited to, an estimate of the efficiency of the use of water on their properties.

(9) Customers are required to conduct a self-audit of their irrigation systems.

(10) Non-agricultural irrigation is limited as follows:

(a) Properties may be irrigated only between the hours of 10 p.m. to 6 a.m.

(b) Properties may not be irrigated more than 3 times per week during the months of April through October and no more than 2 times per week during the months of November through March. Landscaped area of properties that are irrigated by drip irrigation or micro-spray irrigation shall be exempt from these irrigation restrictions.

(c) All automatic irrigation timers shall be adjusted according to changing weather patterns and to eliminate run-off.

(11) Draining and refilling swimming pools, spas, ponds, streams, and artificial lakes is prohibited.

(12) Operation of any decorative fountain, pond, or similar structure is prohibited. No water for decorative fountains may be used, even if it has a recirculating system. No water for decorative fountains may be used even if recycled water is utilized.

(13) Use of water for cooling mists is prohibited.

Section 9. Stage 4 - Water Supply Reduction - Targeting Inefficient Use

(A) Stage 4 is also referred to as a "Water Supply Reduction - Targeting Inefficient Use" stage. The intent of Stage 4 is to target and eliminate excessive water waste and water use in Western's Inefficient Use Category (Tier 3). Stage 4 applies during periods when Western supplies are reduced up to 40%. This may correlate to MWD's WSCP Stage 4.

(B) The objective of the measures undertaken in Stage 4 is a mandatory reduction in water system consumption by 20%.

(C) Potable water customers in areas directly served by Western that do not have Water Budgets shall reduce their water use by 20% from the Base Period.

(D) Water use is prohibited in the "Inefficient Use" category (Tier 3) and is subject to enforcement under Section 15 of the Ordinance.

(E) Customers with dedicated landscape meters will be required to reduce by 25%.

(F) Commercial customers will be required to implement their respective stage in their Water Management Plan.

(G) Western shall develop a public information campaign to provide customers with options for achieving the Stage 4 demand reduction goal and complying with their applicable water allocation.

(H) The permanent prohibitions described in Stage 1 through 3 shall be continually in effect at this level of water shortage declaration in addition to the requirements specific to each level.

(I) Western shall explore enhanced customer incentives for conservation measures. These measures include but are not limited to landscape audits, weather-based irrigation controllers, toilets, washers, and turf replacement.

The Stage 4 shortage response measures include:

(1) All plumbing leaks, improperly adjusted sprinklers, or other water conduits/fixtures that require repair or adjustment shall be corrected to the satisfaction of the Western within 36 hours of customer notification by the Western.

(2) Use of water from fire hydrants shall be limited to firefighting related activities, or other activities necessary to maintain the health, safety, and welfare of the public.

(3) Potable water may not be used for construction purposes. Non-potable and/or recycled water must be used.

Outdoor Water Use

(4) Commercial, Non-agricultural, irrigation is limited as follows:

(a) Properties may be irrigated only between the hours of 10 p.m. to 6 a.m.

(b) Customers shall reduce their outdoor water use by 20% using the "Percent Adjust" feature on their irrigation controller or they may not irrigate more than

2 times per week during the months of April through September and no more than 1 time per week during the months of October through March.

(5) Installation of new landscapes shall be prohibited unless irrigated with recycled water. Exceptions may be provided for projects with prior approval by the appropriate jurisdiction.

Section 10. Stage 5 - Water Supply Reduction - Targeting Outdoor Use

(A) Stage 5 is also referred to as a "Water Supply Reduction - Targeting Outdoor Use" stage. The intent of Stage 5 is to target and eliminate outdoor water use. Stage 5 applies during periods when Western supplies are reduced up to 50%. This may correlate to MWD's WSCP Stage 5.

(B) The objective of the measures undertaken in Stage 5 is a mandatory reduction in water system consumption within Western by 35%.

(C) Potable water Customers in areas directly served by Western that do not have Water Budgets shall reduce their water use by 35% from the Base Period.

(D) Water use is prohibited in the "Outdoor Water Use" category (Tier 2) and is subject to enforcement under Section 15 of the Ordinance.

(E) All landscape and non-essential outdoor water use for all customers in all areas of Western's retail water service area shall be prohibited.

(F) Commercial customers will be required to implement their respective stage in their Water Management Plan.

(G) Western shall develop a public information campaign to provide customers with options for achieving the Stage 5 demand

reduction goal and complying with their applicable water allocation.

(H) The permanent prohibitions described in Stages 1 through 4 shall be continually in effect at this level of water shortage declaration in addition to the requirements specific to each level.

(I) Western shall explore enhanced customer incentives for conservation measures. These measures include but are not limited to landscape audits, weather-based irrigation controllers, toilets, washers, and turf replacement.

The Stage 5 shortage response measures include:

(1) All plumbing leaks, improperly adjusted sprinklers, or other water conduits/fixtures that require repair or adjustment shall be corrected to the satisfaction of the Western within 24 hours of customer notification by Western.

(2) At the discretion of the Board of Directors, no new potable water service connections shall be provided, no new temporary meters or permanent meters shall be provided, and no statements of immediate ability to serve or provide potable water service (such as will serve letters, certificates, or letters of availability) shall be issued.

(3) Western will suspend consideration of annexations to its service area, unless the annexation increases the water supply available to the Western by more than the anticipated demands of the property to be annexed.

(4) No planting of new landscaping (seed, sod, or other plant materials).

(5) No irrigation of lawns, landscapes and/or ornamental gardens. Hand-watering of trees once a week

is allowed. Vegetable gardens under 5,000 square feet in area grown for personal consumption are exempt.

Section 11. Stage 6 - Catastrophic Water Supply Loss - Targeting Indoor Use

(A) Stage 6 is also referred to as a "Catastrophic Water Supply Loss - Targeting Indoor Use" stage. The intent of this stage is to substantially reduce the demand for water through indoor conservation actions. Stage 6 applies during periods when Western supplies are reduced by more than 50%, including catastrophic emergencies. This may correlate to MWD's WSCP Stage 6. Stage 6 may be declared during an Immediate Emergency. A Stage 6 declaration may also be accompanied by a Board Resolution declaring a Water Shortage Emergency under California Water Code sections 350 *et seq.*

(B) The objective of the measures undertaken in Stage 6 is to significantly reduce water consumption within Western's retail water service area to protect public health, safety, and fire flow.

(C) Except as otherwise provided in this Section 10, all water supply shortage response measures of Stages 1 through 5 shall be in full force and effect during Stage 6.

(D) Customers will be required to reduce use in the "Indoor Water Use" category (Tier 1) by 10% or more and is subject to enforcement under Section 15 of the Ordinance.

(E) The use of non-potable or recycled water is permitted pursuant to the specific rules and regulations that govern their use and availability.

(F) All landscape and non-essential outdoor water use for all customers in all areas of Western's retail water service area shall be prohibited.

(G) Except as to property for which a building permit has been heretofore issued, no new water meter(s) shall be provided, except in the following circumstances:

(1) for projects necessary to protect the public's health, safety, and welfare; or

(2) when using recycled water.

(H) Commercial customers will be required to further enact their conservation plan.

(I) Potable water customers in areas directly served by Western that do not have Water Budgets shall reduce their indoor water use by 10%.

(J) The use of water for commercial, manufacturing, or processing purposes may be further reduced in volume than is indicated in this section if it is determined to be in the best interest of the health, sanitation, and fire flow protection in the communities served by Western. This determination may be made by the Board of Directors, the General Manager or his or her authorized designee as provided for in Section 5(E).

(K) All dedicated irrigation meters will be locked off by Western personnel.

(L) Customers with a Western authorized Medical Adjustment to their Tier 1 allocation will be permitted 100% of their Tier 1 Water Budget.

(M) Western shall develop a public information campaign to provide customers with options for achieving the Stage 6 demand reduction goals and complying with their allocation.

(N) Customers are encouraged to participate in customer incentive programs for conservation measures, specifically related to indoor water saving devices like toilets and washers.

Section 12. Violations and remedies

(A) Criminal Violation. It shall be unlawful for any Person to willfully violate the provisions of this Ordinance. Any violation of the provisions of this Ordinance shall be a misdemeanor, unless made an infraction by the prosecutor, subject to imprisonment in the county jail for not more than thirty (30) days or by fine not to exceed \$1,000, or by both as provided in California Water Code section 377.

(B) Cease and Desist Order. The General Manager may issue a cease and desist order directing the Property Owner, or occupant, or other Person in charge of day-to-day operations of any property, and/or any other Person responsible for a violation of this Ordinance to:

(1) immediately discontinue any prohibited use of water pursuant to this Ordinance; and

(2) immediately cease any activity not in compliance with the terms, conditions, and requirements of this Ordinance.

(C) Civil Action. In addition to any other remedies provided in this Ordinance, any violation of this Ordinance may be enforced by civil action brought by the District and the imposition of administrative fines and/or penalties. In any such action, the District may seek, and the court may grant, as appropriate, any or all of the following remedies:

(1) a temporary and/or permanent injunction;

(2) assessment of the violator for the costs of enforcement of the violation and for the reasonable costs of preparing and bringing legal action under this Ordinance; and

(3) assessments under this subsection shall be paid to Western to be used exclusively for costs associated with implementing or enforcing the water supply shortage and regulatory provisions of this Ordinance.

(D) Cumulative. All remedies provided herein shall be cumulative and not exclusive.

(E) On-going. A Person shall be deemed guilty of a separate offense for each and every day or portion thereof during which any violation of any provision of this Ordinance is committed, continued, or permitted.

Section 13. Notices

(A) Any notice, notice of violation, cease and desist order, and administrative compliance order shall be served pursuant to the requirements of this Ordinance and shall:

(1) identify the provision(s) of this Ordinance and any State law, if applicable, alleged to have been violated; and

(2) state that continued noncompliance may result in civil, criminal, or administrative enforcement actions against the Person who committed the violation, or the Property Owner and/or occupant of the property where the violation occurred; and

(3) state a compliance date that must be met by the Person who committed the violation, or the Property Owner and/or occupant of the property where the violation occurred; and

(4) order remediation work, where applicable, that must be taken by the Property Owner and/or occupant of the property; and

(5) state that the recipient has a right to appeal the matter as set forth in this Ordinance; and

(6) include the address of the affected property and be addressed to the Property Owner as shown on the most recently issued equalized assessment roll or as may otherwise appear in the current records of the District. If the order applies to a responsible party who is not the Property Owner, or if the event is not related to a specific property, the notice may be sent to the last known address of the responsible party; and

(7) be deemed served ten (10) business days after posting on the property, if the Property Owner or occupant of the affected property cannot be located after the reasonable efforts of the General Manager or his or her authorized designee.

(B) Any notice, notice of violation, cease and desist order, and administrative compliance order may be sent by regular mail. Service by regular mail is effective on the date of mailing.

(C) The notice of violation may include, where deemed applicable by the General Manager or his or her authorized designee, the following terms and conditions:

(1) specific steps or actions and time schedules for compliance as reasonably necessary to prevent future violations of this Ordinance; and

(2) any other terms, conditions, or requirements reasonably calculated to prevent continued or threatened future violations of this Ordinance, including, but not limited to, discontinuing or limiting water service with the installation of a flow-restricting device.

(D) In addition to or in conjunction with the notice of violation, for a first violation of any provision of this Ordinance, within two (2) weeks of the violation:

(1) the District may provide notice to the Property Owner or occupant of the property where the violation occurred to advise such Person of:

(a) the water supply shortage stage then in effect and the provisions of this Ordinance relating thereto;

(b) water supply shortage response measures that are required and may be implemented pursuant to this Ordinance;

(c) possible consequences and actions which may be taken by Western for future violations of this Ordinance, including discontinuance of water service; and

(d) administrative fines and/or penalties that may be imposed for the specific violation and any future violations of this Ordinance;

(2) if the General Manager or his or her authorized designee deem it to be appropriate, the District may order the installation of a flow-restricting device on the service line for any Person who violates any term or provision of this Ordinance.

(E) In addition to or in conjunction with the notice of violation, for a second or any subsequent violation of this Ordinance, within two (2) weeks of the violation:

(1) the District may provide notice to the property where the violation occurred to notify the Property Owner or occupant of the property where the violation occurred to advise such Person of:

(a) the water supply shortage stage then in effect and the provisions of this Ordinance relating thereto;

(b) the water supply shortage response measures that are required and may be implemented by such Person; and

(c) possible consequences which may occur in the event of any future violations of this Ordinance;

(2) if the General Manager or his or her authorized designee deem it to be appropriate, the District may order the installation of a flow-restricting device on the service line for any Person who violates any term or provision of this Ordinance;

(3) if the General Manager or his or her authorized designee deem it to be appropriate, the District may discontinue water service at the location where the violation occurred.

(F) The District may, after one (1) written notice of violation, order that a special meter reading or readings be made in order to ascertain whether wasteful or unreasonable use of water is occurring. The District may impose a meter reading fee for each meter reading it conducts pursuant to this Ordinance.

Section 14. Administrative compliance order and fines

(A) Separate from, in addition to, or in combination with a notice of violation or cease and desist order, the General Manager or his or her authorized designee may issue an administrative compliance order against the Property Owner and/or occupant of the property where a violation of this Ordinance occurred and/or any other Person responsible for a violation of this Ordinance who violates any provision of this Ordinance. Issuance of a notice of violation or a cease and desist order is not a prerequisite to the issuance of an administrative compliance order. The administrative compliance order shall allege the act(s) or failure(s) to act that constitute violations of this Ordinance and shall set forth the penalty for the violation(s).

(B) The General Manager may impose the following administrative fines and/or penalties, in addition to other appropriate action requirements and measures:

(1) For water meters one inch and smaller (1") in size:

(a) For the first violation during any water supply shortage stage by any Person of any provision of this Ordinance, the District may issue a written notice to the Person which sets forth the facts surrounding the violation and additional information such as the required compliance and potential administrative fines and/or penalties for noncompliance;

(b) For a second violation during any water supply shortage stage by any Person of any provision of this Ordinance within the preceding twelve (12) calendar months,

Western may issue a written notice to the Person which sets forth a complete copy of this Ordinance or summary document of Western's Water Supply Shortage Contingency Response Program as well as additional information such as the required compliance and potential administrative fines and/or penalties for noncompliance.

(c) For a third violation during Stages 1 and 2 by any Person of any of the provisions of this Ordinance within the preceding twelve (12) calendar months, Western may impose an administrative fine and/or penalty in the amount of fifty dollars (\$50.00) per day for each day a Person violates any provision of this Ordinance. During Stages 3 through 6, Western may impose an administrative fine and/or penalty in the amount of one hundred dollars (\$100.00) per day for each day a Person violates any provision of this Ordinance.

(d) For a fourth violation during Stages 1 and 2 by any Person of any of the provisions of this Ordinance within the preceding twelve (12) calendar months, Western may impose an administrative fine and/or penalty in the amount of one hundred dollars (\$100.00) per day for each day a Person violates any provision of this Ordinance. During Stages 3 through 6, Western may impose an administrative fine and/or penalty in the amount of two hundred dollars (\$200.00) per day for each day a Person violates any provision of this Ordinance.

(e) For a fifth and any subsequent violation, Western may install a flow-restricting device of two and one-half gallons per minute (2.5 GPM) capacity for services up to one-inch (1") size and comparatively sized restrictors for larger services or terminate a Person's service in accordance with the District's applicable rules and regulations. These measures are in addition to any an administrative fines and/or penalties provided for herein.

(f) Any such restricted or terminated service may be restored in accordance with Western's applicable rules and regulations and only upon a showing that the Person is in compliance with this Ordinance. Prior to any restoration of service, the customer shall pay all Western charges for any restriction or termination of service and its restoration as provided for in Western rules governing water service, including, but not limited to payment of all past due bills and administrative fines and/or penalties and any other amounts which may be due and owing under this Ordinance.

(2) For water meters larger than one inch (1") and larger:

(a) For the first violation during any water supply shortage stage by any Person of any provision of this Ordinance, the Western may issue a written notice to the Person which sets forth the facts surrounding the violation and additional information such as the required compliance and potential administrative fines and/or penalties for noncompliance.

(b) For a second violation during any water supply shortage stage by any Person of any provision of this Ordinance within the preceding twelve (12) calendar months, Western may issue a written notice to the Person which sets forth a complete copy of this Ordinance or summary document of Western's Water Shortage Contingency Response Program as well as additional information such as the required compliance and potential administrative fines and/or penalties for noncompliance.

(c) For a third violation during water supply shortage Stages 1 and 2 by any Person of any of the provisions of this Ordinance within the preceding twelve (12) calendar months, Western may impose an administrative fine and/or penalty in the amount of fifty dollars (\$50.00) per day for each day a Person violates any provision of this Ordinance. During Stages 3 through

6, Western may impose an administrative fine and/or penalty in the amount of one hundred and fifty dollars (\$150.00) per day for each day a Person violates any provision of this Ordinance.

(d) For a fourth violation during water supply shortage Stages 1 and 2 by any Person of any of the provisions of this Ordinance within the preceding twelve (12) calendar months, Western may impose an administrative fine and/or penalty in the amount of one hundred and fifty dollars (\$150.00) per day for each day a Person violates any provision of this Ordinance. During Stages 3 through 6, Western may impose an administrative fine and/or penalty in the amount of three hundred dollars (\$300.00) per day for each day a Person violates any provision of this Ordinance.

(e) For a fifth and any subsequent violation, Western may install a flow restricting device or terminate a Person's service in accordance with the Western's applicable rules and regulations, in addition to the administrative fines and/or penalties provided for herein.

(f) Any such restricted or terminated service may be restored in accordance with Western's applicable rules and regulations and only upon a showing that the Person is in compliance with this Ordinance. Prior to any restoration of service, the Customer shall pay all Western charges for any restriction or termination of service and its restoration as provided for in the District rules governing water service, including, but not limited to, payment of all past due bills and administrative fines and/or penalties and any other amounts which may be due and owing under this Ordinance.

(3) An amount that shall not exceed one thousand dollars (\$1,000.00) per day for each day on which a Person violates any provision of this Ordinance. Unless timely appealed, an

administrative compliance order shall be effective and final as of the date it is issued by the General Manager.

(C) The amount of any administrative fines and/or penalties imposed pursuant to this Section 14 may be collected by including said amount on the customer's water bill. The amount of any administrative fines and/or penalties imposed pursuant to this Section 14 which have remained delinquent for a period of sixty (60) calendar days shall constitute a lien against the real property of the Person violating this Ordinance. The lien provided herein shall have no force and effect until recorded with the Riverside County Recorder and when recorded shall have the force and effect and priority of a judgment lien and continue for ten (10) years from the time of recording unless sooner released, and shall be renewable in accordance with the provisions of sections 683.110 to 683.220, inclusive, of the California Code of Civil Procedure.

(D) All moneys collected under this Section 14 shall be deposited in a special account of Western and shall be made available for enforcement of this Ordinance and enhanced water conservation incentive programs.

(E) Western may, at its option, elect to petition the Superior Court to confirm any order establishing administrative fines and/or penalties and enter judgment in conformity therewith in accordance with the provisions of sections 1285 to 1287.6, inclusive, of the California Code of Civil Procedure.

Section 15. Drought Fine

(A) Pursuant to California Water Code section 377, Western may enforce water use limitation established by an ordinance or resolution by a volumetric penalty in an established amount.

(B) In accordance with such authority, and separate from, in addition to, or in combination with a notice of violation

or cease and desist order or the administrative compliance order and any administrative fines and/or penalties imposed pursuant thereto, the General Manager or his or her authorized designee may issue a Drought Fine against the Property Owner and/or occupant of the property in order to enforce water use limitations required as a part of this Ordinance and the Program. Issuance of a notice of violation or a cease and desist order or an administrative compliance order is not a prerequisite to the issuance of a Drought Fine. The Drought Fine shall allege the act(s) or failure(s) to act that constitute violations of this Ordinance and shall set forth the penalty for the violation(s).

(C) The General Manager may impose the following Drought Fines:

(1) For water meters once inch (1") and smaller in size:

(a) For violating the targeted reductions described in Sections 8 through 11, subsection D of this Ordinance, Western will issue an incremental Drought Fine based on volumetric usage for noncompliance, as provided below.

(b) For a violation occurring during Stage 3 by any customer of provision 8 (D) of this Ordinance, which is described as water use prohibited in the "Unsustainable Use" Category (defined as Tier 4), Western will impose a Drought Fine in the amounts of zero dollars (\$0.00) for usage occurring zero to fifteen percent (0-15%) above budgeted amount for Tiers 1-3, ten dollars (\$10.00) for usage occurring sixteen to twenty-five percent (16-25%) above budgeted amount for Tiers 1-3, twenty dollars (\$20.00) for usage occurring twenty-six to fifty percent (26-50%) above budgeted amount for Tiers 1-3, and thirty dollars (\$30.00) for usage occurring fifty percent (50%) and more above the budgeted amount for Tiers 1-3.

(i) For example, Western had declared a Stage 3 shortage stage (as defined in this Ordinance). As defined in provision 8 (D) of this Ordinance, which is described as water use prohibited in the "Unsustainable Use" Category (defined as Tier 4). In this example, a Customer, with a meter size of 1-inch, uses 30 billing units and 5 billing units occurs in the Unsustainable Use category (Tier 4). The budgeted amount for Tiers 1-3, also representing the non-restricted water use, is 25 billing units (30 total billing units minus 5 billing units in Tier 4). The percentage determined would be $5/25 = 20\%$, so a fine would be given. The amount of the fine would be looked up by the corresponding percentage usage, meter size, and the relative stage. In this example, their fine of \$10 is added to the Customer's bill (Stage 3, 16-25% restricted category).

(c) For a violation occurring during Stage 4 by any customer of provision 9 (D) of this Ordinance, which is described as water use prohibited in the "Inefficient Use" Category (defined as Tier 3), Western will impose a Drought Fine in the amounts of zero dollars (\$0.00) for usage occurring zero to fifteen percent (0-15%) above budgeted amount for Tier 3, twenty dollars (\$20.00) for usage occurring sixteen to twenty-five percent (16-25%) above budgeted amount for Tier 3, thirty dollars (\$30.00) for usage occurring twenty-six to fifty percent (26-50%) above budgeted amount for Tier 3, and forty dollars (\$40.00) for usage occurring fifty percent (50%) and more above the budgeted amount for Tier 3.

(i) For example, Western had declared a Stage 4 shortage stage (as defined in this Ordinance). As defined in provision 9 (D) of this Ordinance, which is described as water use prohibited in the "Inefficient Use" Category (defined as Tier 3). In this example, a Customer, with a meter size of 1-inch, uses 20 billing units and 6 billing units occurs in water

use in the Inefficient water use category. The non-restricted water use is 14 billing units (20 total billing units minus 6 billing units in Tier 3 or higher). The percentage determined would be $6/14 = 42\%$, so a fine would be given. The amount of the fine would be looked up by the corresponding percentage usage, meter size, and the relative stage. In this example, their fine of \$30 is added to the Customer's bill (Stage 4, 26-50% restricted category).

(d) For a violation occurring during Stage 5 by any customer of provision 10 (D) of this Ordinance, which is described as water use prohibited in the "Outdoor Water Use" Category (defined as Tier 2), Western will impose a Drought Fine in the amounts of zero dollars (\$0.00) for usage occurring zero to fifteen percent (0-15%) above budgeted amount for Tier 2, thirty dollars (\$30.00) for usage occurring sixteen to twenty-five percent (16-25%) above budgeted amount for Tier 2, forty dollars (\$40.00) for usage occurring twenty-six to fifty percent (26-50%) above budgeted amount for Tier 2, and forty-five dollars (\$45.00) for usage occurring fifty percent (50%) and more above the budgeted amount for Tier 2.

(e) For a violation occurring during Stage 6 by any customer of provision 11 (D) of this Ordinance, which is described as requiring indoor reductions by 10% or more (defined as Tier 1), Western will impose a Drought Fine in the amounts of zero dollars (\$0.00) for usage occurring zero to fifteen percent (0-15%) above reduced amount for Tier 1, forty-five dollars (\$45.00) for usage occurring sixteen to twenty-five percent (16-25%) above reduced amount for Tier 1, fifty-five dollars (\$55.00) for usage occurring twenty-six to fifty percent (26-50%) above reduced amount for Tier 1, and sixty-five dollars (\$65.00) for usage occurring fifty percent (50%) and more above the reduced amount for Tier 1.

For water meters larger than one inch (1"):

(a) For violating the targeted reductions described in Sections 8 through 11, subsection E of this Ordinance, Western will issue an incremental fine based on volumetric usage for noncompliance.

(b) For a violation occurring during Stage 3 by any customer of provision 8 (D) of this Ordinance, which is described as water use prohibited in the "Unsustainable Use" Category (defined as Tier 4), Western will impose a Drought Fine in the amounts of zero dollars (\$0.00) for usage occurring zero to fifteen percent (0-15%) above budgeted amount for Tiers 1-3, thirty dollars (\$30.00) for usage occurring sixteen to twenty-five percent (16-25%) above budgeted amount for Tiers 1-3, fifty-five dollars (\$55.00) for usage occurring twenty-six to fifty percent (26-50%) above budgeted amount for Tiers 1-3, and eighty dollars (\$80.00) for usage occurring fifty percent (50%) and more above the budgeted amount for Tiers 1-3.

(c) For a violation occurring during Stage 4 by any customer of provision 9 (D) of this Ordinance, which is described as water use prohibited in the "Inefficient Use" Category (defined as Tier 3), Western will impose a Drought Fine in the amounts of zero dollars (\$0.00) for usage occurring zero to fifteen percent (0-15%) above budgeted amount for Tier 3, fifty-five dollars (\$55.00) for usage occurring sixteen to twenty-five percent (16-25%) above budgeted amount for Tier 3, eighty dollars (\$80.00) for usage occurring twenty-six to fifty percent (26-50%) above budgeted amount for Tier 3, and one hundred dollars (\$100.00) for usage occurring fifty percent (50%) and more above the budgeted amount for Tier 3.

(d) For a violation occurring during Stage 5 by any customer of provision 10 (D) of this Ordinance, which is described as water use prohibited in the "Outdoor Water Use" Category (defined as Tier 2), Western will impose a Drought Fine

in the amounts of zero dollars (\$0.00) for usage occurring zero to fifteen percent (0-15%) above budgeted amount for Tier 2, eighty dollars (\$80.00) for usage occurring sixteen to twenty-five percent (16-25%) above budgeted amount for Tier 2, one hundred dollars (\$100.00) for usage occurring twenty-six to fifty percent (26-50%) above budgeted amount for Tier 2, and one hundred and thirty dollars (\$130.00) for usage occurring fifty percent (50%) and more above the budgeted amount for Tier 2.

(e) For a violation occurring during Stage 6 by any customer of provision 11 (D) of this Ordinance, which is described as requiring indoor reductions by 10% or more (defined as Tier 1), Western will impose a Drought Fine in the amounts of zero dollars (\$0.00) for usage occurring zero to fifteen percent (0-15%) above reduced amount for Tier 1, one hundred and thirty dollars (\$130.00) for usage occurring sixteen to twenty-five percent (16-25%) above reduced amount for Tier 1, one hundred and fifty-five dollars (\$155.00) for usage occurring twenty-six to fifty percent (26-50%) above reduced amount for Tier 1, and one hundred and eighty-five dollars (\$185.00) for usage occurring fifty percent (50%) and more above the reduced amount for Tier 1.

(D) The amount of any Drought Fines imposed pursuant to this Section 15 may be collected by including said amount on the customer's water bill.

(E) All moneys collected under this Section 15 shall be deposited in a special account of Western and shall be made available for enforcement of this Ordinance and water conservation programs.

1. Conservation Penalty Account:

(a) Enhanced conservation programs designed to reduce water demands;

(b) Outreach and Education Programs designed to reduce water demands, decrease water waste, or generally raise water awareness;

(c) Enforcement of any provision of this Ordinance;

Section 16. Recovery of costs

(A) The General Manager shall serve an invoice for costs upon the Property Owner and/or occupant of any property, or any other responsible Person who is subject to a notice of violation, a cease and desist order, or an administrative compliance order. An invoice for costs shall be immediately due and payable to Western. If any Property Owner or Person in charge of day-to-day operations, Customer, or responsible party, or any other Person fails to either pay the invoice for costs or appeal successfully the invoice for costs in accordance with this Ordinance, then Western may institute collection proceedings. The invoice for costs may include reasonable attorneys' fees.

(B) Western shall impose any other fines and/or penalties or regulatory fees, as fixed from time to time by the Board of Directors, for a violation or enforcement of this Ordinance.

(C) In order to recover the costs of the water supply shortage program set forth in this Ordinance, the Board of Directors may, from time to time, fix and impose fees and charges. Western fees and charges may include, but are not limited to fees and charges for:

(1) any visits of an Enforcement Officer or other District staff for time incurred for meter reading, follow-up visits, or the installation or removal of a flow-restricting device;

(2) monitoring, inspection, and surveillance procedures pertaining to enforcement of this Ordinance;

(3) enforcing compliance with any term or provision of this Ordinance;

(4) re-initiating service at a property where service has been discontinued pursuant to this Ordinance;

(5) processing any fees necessary to carry out the provisions of this Ordinance.

Section 17. Appeals

Any Person subject to a notice of violation, cease and desist order, administrative compliance order, or drought fine may file a written appeal of such order or notice to the General Manager within thirty (30) calendar days of the date of service of the order or notice. An appeal shall be made in accordance with the following procedures:

(1) The Appellant shall complete and submit in writing a form provided by Western for such purpose and shall state in such form the grounds for his or her appeal. All appeals shall be submitted to Western's Board Secretary within thirty (30) calendar days of the date of the notice of violation, cease and desist order, administrative compliance order, or Drought Fine.

(2) The General Manager or his or her authorized designee shall review the appeal and any related information provided, and, if necessary, cause an investigation and report to be made concerning the request for Relief. The General Manager or his or her authorized designee shall have fifteen (15) calendar days from the submission of the appeal to render a decision on whether to grant the appeal and mail notice thereof to the Appellant. If the General Manager or his or her authorized designee grants the appeal, then within fifteen (15) calendar days of such

determination the General Manager or his or her authorized designee shall give written notice thereof to the Appellant.

(3) The decision of the General Manager or his or her authorized designee may be appealed by the Appellant to the Board of Directors. Such appeal must be submitted in writing and filed with the District Secretary within fifteen (15) calendar days of the date of decision of the General Manager or his or her authorized designee. The Board of Directors shall conduct a hearing on such appeal at its next regularly scheduled Board of Directors meeting; provided, however, the Board of Directors shall have received the notice of appeal at least fifteen (15) calendar days prior to such meeting. If the appeal is not submitted within at least fifteen (15) calendar days prior to a regularly scheduled Board of Directors meeting, then the Hearing shall be held at the following regularly scheduled meeting of the Board of Directors. A notice of the Hearing shall be mailed to the Appellant at least ten (10) calendar days before the date fixed for the Hearing. The Board of Directors shall review the appeal de novo. The determination of the Board of Directors shall be conclusive and shall constitute a final order. Notice of the determination by the Board of Directors shall be mailed to the Appellant within ten (10) calendar days of such determination and shall indicate whether the appeal has been granted in whole or in part and set forth the terms and conditions of the appeal, if any, granted to the Appellant. If the appeal is denied, the Appellant shall comply with all terms and conditions of this Ordinance and the applicable stage then in effect.

(4) Until the conclusion of the appeal process, all provisions and decisions under appeal shall remain in full force and effect until the conclusion of the appeal process.

Section 17. Relief from compliance

Consideration of written applications for Relief from compliance regarding the regulations and restrictions on water use set forth in this Ordinance may be made.

(A) Written applications for Relief shall be accepted, and may be granted or denied, by the Approving Authority, at his or her sole discretion, or by his or her designee at his or her sole discretion. The application shall be in a form prescribed by Western and shall be accompanied by a non-refundable processing fee in an amount as determined by the Board of Directors for the purpose of defraying the costs incidental to the proceedings.

(B) The grounds for granting or conditionally granting Relief are:

(1) due to unique circumstances, a specific requirement of this Ordinance would result in undue hardship to a Person using Western water or to property upon which Western water is used, that is disproportionate to the impacts to other Western water users generally or to similar property or classes of water users; or

(2) failure to grant Relief would adversely affect the health, sanitation, fire protection, or safety of the applicant or the public.

(C) The application for Relief shall be accompanied, as appropriate, with photographs, maps, drawings, and other information substantiating the applicant's request, including a statement of the applicant.

(D) An application for Relief shall be denied unless the Approving Authority finds, based on the information provided in the application, supporting documentation, or such other additional information as may be requested, and on water use information for the property as shown by the records of Western, all of the following:

(1) That the Relief does not constitute a grant of special privilege inconsistent with the limitations upon other Western customers;

(2) That because of special circumstances applicable to the property or its use, the strict application of this Ordinance would have a disproportionate impact on: (a) the property or use that exceeds customers generally; or (b) the applicant's health that exceeds customers generally;

(3) That the authorization of such Relief will not be of substantial detriment to adjacent properties, will not materially affect the ability of Western to effectuate the purposes of this Ordinance, and will not be detrimental to the public interest; and

(4) That the condition or situation of: (a) the subject property or the intended use of the property for which the Relief is sought is not common, recurrent, or general in nature; or (b) the applicant's health or safety is not common, recurrent, or general in nature.

(E) The denial or grant of a Relief shall be acted upon within fifteen (15) business days of the submittal of the complete application, including any photographs, maps, drawings, and other information substantiating the applicant's request and the statement of the applicant. The application may be approved, conditionally approved, or denied. The decision of the Approving Authority shall be prepared in writing, include terms and conditions, if any, and promptly sent to the applicant.

(F) The denial of a request for Relief may be appealed in writing to the General Manager. An appeal shall be made in accordance with the following procedures:

(1) The Appellant shall complete and submit in writing a form provided by the District for such purpose and shall

state in such form the grounds for his or her appeal. All appeals shall be submitted to Western's Board Secretary within thirty (30) calendar days of the date of the notice of the denial of the request for Relief.

(2) The General Manager or his or her authorized designee shall review the appeal and any related information provided, and, if necessary, cause an investigation and report to be made concerning the request for Relief. The General Manager or his or her authorized designee shall have fifteen (15) calendar days from the submission of the appeal to render a decision on whether to grant the appeal and mail notice thereof to the Appellant. If the General Manager or his or her authorized designee grants the appeal and determines that the request for Relief shall be granted, then within fifteen (15) calendar days of such determination the General Manager or his or her authorized designee shall give written notice thereof to the Appellant.

(3) The decision of the General Manager or his or her authorized designee may be appealed by the Appellant to the Board of Directors. Such appeal must be submitted in writing and filed with the District Secretary within fifteen (15) calendar days of the date of decision of the General Manager or his or her authorized designee. The Board of Directors shall conduct a hearing on such appeal at its next regularly scheduled Board of Directors meeting; provided, however, the Board of Directors shall have received the notice of appeal at least fifteen (15) calendar days prior to such meeting. If the appeal is not submitted within at least fifteen (15) calendar days prior to a regularly scheduled Board of Directors meeting, then the Hearing shall be held at the following regularly scheduled meeting of the Board of Directors. A notice of the Hearing shall be mailed to the Appellant at least ten (10) calendar days before the date fixed for the Hearing. The

Board of Directors shall review the appeal de novo. The determination of the Board of Directors shall be conclusive and shall constitute a final order. Notice of the determination by the Board of Directors shall be mailed to the Appellant within ten (10) calendar days of such determination and shall indicate whether the appeal has been granted in whole or in part and set forth the terms and conditions of the Relief, if any, granted to the Appellant. If the appeal is denied, the Appellant shall comply with all terms and conditions of this Ordinance and the applicable stage then in effect.

(4) Until the conclusion of the appeal process, all provisions and decisions under appeal shall remain in full force and effect until the conclusion of the appeal process.

Section 19. Conflicting Provisions

If provisions of this Ordinance are in conflict with each other, other rules and regulations of Western, any other resolution or ordinance of Western, or any State law or regulation, the more restrictive provisions shall apply.

Section 20. Severability

If any provision, section, subsection, sentence, clause or phrase or sections of this Ordinance, or the application of same to any Person or set of circumstances, is for any reason held to be unconstitutional, void or invalid, the invalidity of the remaining portions of sections of this Ordinance shall not be affected, it being the intent of the Board of Directors in adopting this Ordinance that no portions, provisions, or regulations contained herein shall become inoperative, or fail by reason of the unconstitutionality of any other provision hereof and all provisions of this Ordinance are declared to be severable for that purpose.

Section 21. Effective Date and Publication

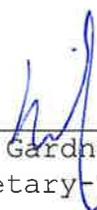
This Ordinance shall be effective upon adoption. Within ten (10) days after its adoption, Western's Board Secretary shall cause this Ordinance to be published once pursuant to California Government Code section 6061 in full in a newspaper of general circulation which is printed, published, and circulated in the District. If there is no such newspaper, the Ordinance shall be posted within Western after its adoption in three public places.

ADOPTED AND APPROVED this 19th day of January 2022 by the Board of Directors of the Western Municipal Water District.


Brenda Dennstedt
President

January 19, 2022

I HEREBY CERTIFY that the foregoing is a full, true, and correct copy of Ordinance 394 adopted by the Board of Directors of the Western Municipal Water District of Riverside County at the scheduled Public Hearing held January 19, 2022.


Mike Gardner
Secretary-Treasurer

Attachment 5 - Adoption Resolution 3198

RESOLUTION 3198

RESOLUTION OF THE BOARD OF DIRECTORS
OF WESTERN MUNICIPAL WATER DISTRICT OF
RIVERSIDE COUNTY ADOPTING A REVISED
WATER SHORTAGE CONTINGENCY PLAN

WHEREAS, The California Urban Water Management Planning Act, Water Code Section 10610 et seq. (the Act), mandates that every urban supplier of water providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually, prepare and adopt, in accordance with prescribed requirements, a water shortage contingency plan (WSCP) and to update it from time to time; and

WHEREAS, the Act specifies the requirements and procedures for adopting such Water Shortage Contingency Plans; and

WHEREAS, Western Municipal Water District of Riverside County (Western) meets the definition of both an urban retail water supplier and an urban wholesale water supplier for purposes of the Act; and

WHEREAS, in compliance with the Act, Western adopted a WSCP on June 16, 2021; AND

WHEREAS, Western has prepared a revised WSCP in accordance with the Act, and in accordance with applicable legal requirements, has undertaken certain coordination, notice, public involvement, public comment, and other procedures in relation to its WSCP; and

WHEREAS, in accordance with the Act, Western has prepared its WSCP with its own staff, with the assistance of consulting professionals, and in cooperation with other

governmental agencies, and has utilized and relied upon industry standards and the expertise of industry professionals in preparing its WSCP, and has also utilized the California Department of Water Resources Guidebook for Urban Water Suppliers to Prepare 2020 Urban Water Management Plans (March 2021), including its related appendices, in preparing its WSCP; and

WHEREAS, in accordance with applicable law, including Water Code section 10642, and Government Code section 6066, a Notice of a Public Hearing regarding Western's WSCP was published within the jurisdiction of Western on December 15 and 22, 2021 for English language and December 17 and 24, 2021 for Spanish language; and

WHEREAS, in accordance with applicable law, including but not limited to Water Code section 10642, a public hearing was held on January 19 at 9:30 a.m., or soon thereafter, in the boardroom of the offices of the Western Municipal Water District of Riverside County, 14205 Meridian Parkway, Riverside, California 92518 in order to provide members of the public and other interested entities with the opportunity to be heard in connection with proposed adoption of the WSCP and issues related thereto; and

WHEREAS, pursuant to said public hearing on Western's WSCP, Western, among other things, encouraged the active involvement of diverse social, cultural, and economic members of the community within Western's service area with regard to the preparation of the Plan, encouraged community input regarding Western's Water Shortage Contingency Plan; and

WHEREAS, the Board of Directors has reviewed and considered the purposes and requirements of the Act, the contents of the WSCP, and the documentation contained in the administrative record in support of the WSCP, and has determined that the factual analyses and conclusions set forth in the WSCP are legally sufficient; and

WHEREAS, Section 10652 of the California Water Code provides that the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code) does not apply to the preparation and adoption of a WSCP; and

WHEREAS, Western is updating its WSCP to incorporate the details described in Ordinance 394; and

WHEREAS, the Board of Directors desires to adopt an updated WSCP in compliance with the Act.

NOW THEREFORE BE IT RESOLVED, the Board of Directors of the Western Municipal Water District of Riverside County hereby resolve as follows:

1. The recitals above are true and correct;
2. The revised Water Shortage Contingency Plan is hereby adopted, as amended by changes incorporated by the Board of Directors as a result of input received (if any) at the public hearing and ordered filed with the Secretary of the Board of Directors;
3. The General Manager is hereby authorized and directed to include a copy of this Resolution in Western's Water Shortage Contingency Plan;
4. The General Manager is hereby authorized and directed, in accordance with Water Code sections 10621(d) and 10644(a)(1)-(2), to electronically submit a copy of the WSCP

to the California Department of Water Resources no later than thirty (30) days after this adoption date;

5. The General Manager is hereby authorized and directed, in accordance with Water Code section 10644(a), to submit a copy of the WSCP to the California State Library, and any city or county within which Western provides water supplies no later than thirty (30) days after this adoption date;

6. The General Manager is hereby authorized and directed, in accordance with Water Code section 10645, to make the WSCP available for public review at Western's offices during normal business hours and on Western's website no later than thirty (30) days after filing a copy of the WSCP with the California Department of Water Resources;

7. The General Manager is hereby authorized and directed, in accordance with Water Code Section 10635(b), to provide that portion of the WSCP prepared pursuant to Water Code Section 10635(a) to any city or county within which Western provides water supplies no later than sixty (60) days after submitting a copy of the WSCP with the California Department of Water Resources;

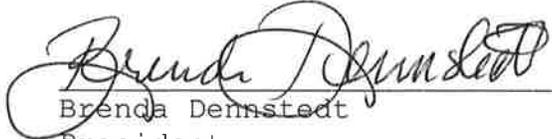
8. Western finds and determines that this resolution is not subject to CEQA pursuant to Water Code Section 10652 because CEQA does not apply to the preparation and adoption of a water shortage contingency plan or to the implementation of the actions taken pursuant to such plans. Because this resolution comprises the adoption of Western's water shortage contingency plan and involves its implementation, no CEQA review is required;

9. Pursuant to CEQA, Western directs staff to file a Notice of Exemption with the Riverside County Clerk's office within five (5) working days of adoption of this resolution;

10. The document and materials that constitute the record of proceedings on which this resolution and the above findings have been based are located at Clerk of the Board of Directors of Western Municipal Water District. The custodian for these records is the Clerk of the Board of Western;

11. The General Manager is hereby authorized and directed to implement the WSCP in accordance with the Act and to provide recommendations to the Board of Directors regarding the necessary budgets, procedures, rules, regulations or further actions to carry out the effective and equitable implementation of the WSCP.

ADOPTED, this 19th day of January, 2022.



Brenda Dennstedt
President

January 19, 2022

I HEREBY CERTIFY that the foregoing is a full, true, and correct copy of Resolution 3198 adopted by the Board of Directors of Western Municipal Water District of Riverside County at its regular meeting held on January 19, 2022.



Mike Gardner
Secretary-Treasurer

Attachment 6 - Public Hearing Notice

Legal Notice Western Municipal Water District Public Hearing Notice Ordinance 394 and 2022 Water Shortage Contingency Plan

Notice is hereby given that on **January 19, 2022 at 9:30 a.m.** in the Western Municipal Water District (Western) Boardroom, first floor at 14205 Meridian Parkway, Riverside, CA 92518, the Western Board of Directors will conduct public hearings to receive public comments and consider adoption of the (1) Draft Ordinance 394 and (2) Draft Revised Water Shortage Contingency Plan (WSCP). Following the public hearing, the Western Board of Directors may adopt the Draft Ordinance 394 and Draft WSCP with recommended modifications as a result of public input.

Ordinance 394 establishes an updated retail customer water supply shortage contingency response program (Program). The Program establishes six water shortage stages, implements water supply shortage responses measures, regulates water consumption within the District to conserve and protect the District's water supplies, to reduce water consumed, and to prevent waste or reasonable use of water. The Program also adjusts administrative fines and adds a drought fine. The Program provides authority for the District to implement its WSCP. The Draft WSCP documents Western's plans to manage and mitigate an actual water shortage condition, should one occur because of drought or other impacts on water supplies. The Draft revised WSCP incorporates the details described in Draft Ordinance 394.

A copy of the Draft Ordinance 394 and Draft WSCP will be available for public review beginning on **December 15, 2021** and can be downloaded at www.wmwd.com/uwmp. Please contact the District if you require special accommodations.

Please provide written comments on the Draft Ordinance 394 and Draft WSCP documents to board secretary@wmwd.com prior to 12:00 p.m., January 18, 2022. Members of the public who wish to comment on the Ordinance 394 and the WSCP, may make comments virtually during the public hearing, or may submit comments at the following web Address: <https://wmwd.com/publiccomments>, or directly to boardsecretary@wmwd.com. Comments received before 12:00 p.m., January 18, 2022, will become part of the January 19, 2022 public hearing and Board meeting records.

If you have any questions regarding Western's Draft Ordinance 394, Draft WSCP, or public hearing meeting, please contact Melissa Matlock at 951.571.7260 or mmatlock@wmwd.com.

Press-Enterprise: 12/15, 12/22



City of Menifee PUBLIC NOTICE

NOTICE OF FUNDING AVAILABILITY (NOFA) FOR THE COMMUNITY BLOCK GRANT PROGRAM (CDBG) FY 2022/2023

On an annual basis, the City releases a Notice of Funding Availability (NOFA) for use of the grant funds from the U.S. Department of Housing and Urban Development (HUD). The funding objectives are to develop viable communities through public/private partnerships by providing decent affordable housing, a suitable living environment, and expanded economic development opportunities principally for persons of low and moderate income.

The City of Menifee is pleased to announce the release of its 2022/2023 Community Development Block Grant (CDBG) Applications.

An information booklet explaining the federal and local goals for the CDBG Program, outlining eligible activities, eligibility criteria, and including the required application with completion instructions is in the city's website: <https://www.cityofmenifee.us/421/Programs-and-Grants>.

City staff is available to answer questions related to this NOFA and provide technical assistance to any agency wishing to apply.

An informational workshop will be held on Thursday, January 27, 2022, at 6:00 P.M. in the City Council Chambers, Menifee City Hall, 29844 Haun Road, Menifee, CA 92586. ATTENDANCE IS REQUIRED if applying for funds.

All applications must be received no later than 1PM, Tuesday, February 10, 2022.

For more information, please contact Edna I. Lebrón, Sr. Management Analyst, City of Menifee at 951-723-3713 or elebron@cityofmenifee.us. Press-Enterprise: 12/15

NOTICE OF TITLE V PERMIT MODIFICATION

NOTICE IS HEREBY GIVEN THAT Mitsubishi Cement Corporation – Cushenbury Plant (MCC), located 5808 Highway 18 in Lucerne Valley, California, has applied for Preconstruction Review including Significant Modification of a Federal Operating Permit (FOP) pursuant to the provisions of MDAQMD Regulations XII and XIII, respectively. MCC is a Portland Cement manufacturing facility located in Lucerne Valley, which includes the mining and processing of limestone, excavation, conveying, calcining, crushing, screening, storage, and transporting of materials including their primary product, cement. MCC operates under FOP number 11800001 and proposes to install one additional clinker storage dome to their existing clinker storage dome complex.

REQUEST FOR COMMENTS: Interested persons are invited to submit written comments and/or other documents regarding the terms and conditions of the proposed Federal Operating Permit. If you submit written comments, you may also request a public hearing on the proposed Significant Modification of the FOP. To be considered, comments, documents and requests for public hearing must be submitted no later than 5:00 P.M. on January 14, 2022 (or 30 days after this publication date, whichever is later) to the MDAQMD, Attention: Chris Anderson at the address listed below.

PETITION FOR REVIEW: Federal Operating Permits are also subject to review and approval by the United States Environmental Protection Agency (USEPA). If the USEPA finds no objection to the proposed permit renewal, the final permit will be issued. In the event of public objection to the issuance of a specific permit, a Title V petition may be submitted to the USEPA Administrator electronically through the Central Data Exchange at: <https://cdx.epa.gov/> or in writing to USEPA at 1200 Pennsylvania Ave, N.W., Washington, D.C. 20460. In order to file a Title V petition, issues must be raised with reasonable specificity during the public comment period, and filed within 60 days of the close of the USEPA review period.

AVAILABILITY OF DOCUMENTS: The proposed Federal Operating Permit, as well as the application and other supporting documentation are available for review at the MDAQMD offices, 14306 Park Avenue, Victorville, CA 92392. In addition, these documents are available on the MDAQMD website and can be viewed at following link: <https://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting-regulated-industry>. Please contact Chris Anderson, Air Quality Engineer, at the above address or (760) 245-1661, extension 1846 or at canderson@mdaqmd.ca.gov for additional questions pertaining to this action and/or corresponding documents.

*Traducción en español esta disponible por solicitud. Por favor llame: (760) 245-1661

SHERI HAGGARD Engineering Supervisor II Mojave Desert Air Quality Management District 14306 Park Avenue Victorville, CA 92392 Press-Enterprise: 12/15

GOVERNMENT ACTIONS & THE NEWSPAPER ROLE

Throughout our nation's history, government agencies have been required to alert citizens of certain government activities that may impact a local community, providing citizens with an opportunity to stay informed and take action when necessary. Newspapers have long partnered with government agencies by publishing public notices, enabling the government to be fully transparent and accountable to citizen taxpayers.

Publishing public notices in newspapers informs a wide audience in a local community of a government agency's action; reaching citizens that are passive information seekers. Publishing public notices through the local newspaper also serves an important audit role as the newspaper acts as an independent third party able to legally verify that the government agency has given the public notice.

Take a moment and look through the public notices. You may be surprised by what you will learn.

NOTICE OF ITEMS FOR DONATION

As a result of the demolition of the former Crestmore plant at 1500 Rubidoux Blvd, a number of unused empty paper bags that would have been used to package dry cement mix from Riverside Cement are being made available to the public free of charge. The bags are in a variety of sizes and styles. You must have the ability to transport the bags from site, and a max of 2 items per person is allowed. Priority will be given to publicly accessible museums/archives, followed by private collectors or others specializing in preservation work, and then to individuals who have a specified history-oriented use for the items, and then to individuals who have a meaningful personal connection with the site. Items will be made available until January 30, 2022. Inquiries and supporting information can be sent to riversidecementbags@gmail.com. Press-Enterprise: 11/16 - 12/15

NEED TO FILE A FICTITIOUS BUSINESS NAME STATEMENT?

You can contact your County Clerk's office at:
San Bernardino County • (909) 387-8306
Los Angeles County • (562) 462-2177

The Hemet News
 Published under Case 17137 - Oct 10, 1927
Legal Notices

NOTICE OF PETITION TO ADMINISTER ESTATE OF: DAVID MICHAEL MCGINN CASE NO. PRMC2101240

To all heirs, beneficiaries, creditors, contingent creditors, and persons who may otherwise be interested in the WILL or estate, or both, of DAVID MICHAEL MCGINN: A PETITION FOR PROBATE has been filed by BRANDY BLOMGREN in the Superior Court of California, County of RIVERSIDE.

THE PETITION FOR PROBATE requests that BRANDY BLOMGREN be appointed as personal representative to administer the estate of the decedent.

THE PETITION requests authority to administer the estate under the Independent Administration of Estates Act. (This authority will allow the personal representative to take many actions without obtaining court approval. Before taking certain very important actions, however, the personal representative will be required to give notice to interested persons unless they have waived notice or consented to the proposed action.) The independent administration authority will be granted unless an interested person files an objection to the petition and shows good cause why the court should not grant the authority.

A HEARING on the petition will be held in this court as follows: 01/18/22 at 8:30AM in Dept. T1 located at 41002 COUNTY CENTER DRIVE, #100, TEMECULA, CA 92591

Notice of Telephonic Hearing Department T1

Call 1-844-621-3956 (toll free) or 1-213-306-3065, enter meeting number: 288212024. Or, join by URL: <https://riversidecourts.webex.com/meet/femdept11webex>. Go to court's website under Probate Division to locate your calendar matter number and name yourself before joining the hearing as: ex. "02 Atty Smith" or "02 Betty Jones".

IF YOU OBJECT to the granting of the petition, you should appear at the hearing and state your objections or file written objections with the court before the hearing. Your appearance may be in person or by your attorney.

IF YOU ARE A CREDITOR or a contingent creditor of the decedent, you must file your claim with the court and mail a copy to the personal representative appointed by the court within the later of either (1) four months from the date of first issuance of letters to a general personal representative, as defined in section 58(b) of the California Probate Code, or (2) 60 days from the date of mailing or personal delivery to you of a notice under section 9052 of the California Probate Code.

Other California statutes and legal authority may affect your rights as a creditor. You may want to consult with an attorney knowledgeable in California law.

YOU MAY EXAMINE the file kept by the court. If you are a person interested in the estate, you may file with the court a Request for Special Notice (form DE-154) of the filing of an inventory and appraisal of estate assets or of any petition or account as provided in Probate Code section 1250. A Request for Special Notice form is available from the court clerk.

DAVID S. CHON - SBN 238274, THE LEGACY LAWYERS, PROFESSIONAL CORPORATION 10221 SLATER AVENUE, SUITE 106 FOUNTAIN VALLEY CA 92708 BSC 220921 12/15, 12/16, 12/22/21 CNS-3537197#

THE HEMET NEWS

NOTICE OF PETITION TO ADMINISTER ESTATE OF: HOWARD DOUGLAS HISINGTON

CASE NUMBER: PRMC2101156

To all heirs, beneficiaries, creditors, contingent creditors, and persons who may otherwise be interested in the will or estate, or both, of: HO

A Petition for Probate has been filed by: LORI REAKSECKER in the Superior Court of California, County of: Riverside

The Petition for Probate requests that: LORI REAKSECKER be appointed as personal representative to administer the estate of the decedent.

The petition requests authority to administer the estate under the Independent Administration of Estates Act. (This authority will allow the personal representative to take many actions without obtaining court approval. Before taking certain very important actions, however, the personal representative will be required to give notice to interested persons unless they have waived notice or consented to the proposed action.) The independent administration authority will be granted unless an interested person files an objection to the petition and shows good cause why the court should not grant the authority.

A hearing on the petition will be held in this court as follows:

Date: 12/30/2021
 Time: 8:30 AM Dept.: T1
 Address of court: 41002 County Center Drive #100, Temecula, CA 92591. This hearing may be attended by telephone:

- Call 1-844-621-3956 (toll free) or 1-213-306-3065
- Enter Meeting Number: 288212024
- Or, join by URL: <https://riversidecourts.webex.com/meet/femdept11webex>

It is important to call in promptly. Otherwise, there may be a delay before you are able to speak during the hearing.

If you object to the granting of the petition, you should appear at the hearing and state your objections or file written objections with the court before the hearing. Your appearance may be in person or by your attorney.

If you are a creditor or a contingent creditor of the decedent, you must file your claim with the court and mail a copy to the personal representative appointed by the court within the later of either (1) four months from the date of first issuance of letters to a general personal representative, as defined in section 58(b) of the California Probate Code, or (2) 60 days from the date of mailing or personal delivery to you of a notice under section 9052 of the California Probate Code.

Other California Statutes and legal authority may affect your rights as a creditor. You may want to consult with an attorney knowledgeable in California law.

You may examine the file kept by the court. If you are a person interested in the estate, you may file with the court a Request for Special Notice (form DE-154) of the filing of an inventory and appraisal of estate assets or of any petition or account as provided in Probate Code section 1250. A Request for Special Notice form is available from the court clerk.

Attorney for Petitioner: COLLEEN S. PATTERSON LAW OFFICE OF COLLEEN S. PATTERSON 41591 E. FLORIDA AVE., SUITE H, HEMET, CA 92544 (951) 658-4900 Hemet News: 12/09, 12/15, 12/16

NOTICE OF TRUSTEE'S SALE TS

No.: FHAC.277-768 APN: 551-383-006 Title Order No.: DS7300-20001278

NOTE: THERE IS A SUMMARY OF THE INFORMATION IN THIS DOCUMENT ATTACHED TO YOU ARE IN DEFAULT UNDER A DEED OF TRUST DATED 10/19/2005. UNLESS YOU TAKE ACTION TO PROTECT YOUR PROPERTY, IT MAY BE SOLD AT A PUBLIC SALE. IF YOU NEED AN EXPLANATION OF THE NATURE OF THE PROCEEDING AGAINST YOU, YOU SHOULD CONTACT A LAWYER. A public auction sale to the highest bidder for cash, cashier's check drawn on a state or national bank, check drawn by a state or federal credit union, or a check drawn by a state or federal savings and loan association, or savings association, or savings bank specified in Section 5102 of the Financial Code and authorized to do business in this state will be held by the duly appointed trustee as shown below, of all right, title, and interest conveyed to and now held by the trustee in the hereinafter described property under and pursuant to a Deed of Trust described below. The sale will be made, but without covenant or warranty, expressed or implied, regarding title, possession, or encumbrances, to pay the remaining principal sum of the note(s) secured by the Deed of Trust, with interest and late charges thereon, as provided in the note(s), advances, under the terms of the Deed of Trust, interest thereon, fees, charges and expenses of the Trustee for the total amount (at the time of the initial publication of the Notice of Sale) reasonably estimated to be set forth below. The amount may be greater on the day of sale. Trustor: HENRY V. BATHANTI AND GLENDA BATHANTI, HUSBAND AND WIFE AS JOINT TENANTS Duly Appointed Trustee: PROBER AND RAPHAEL, ALC Recorded 10/27/2005 as Instrument No. 2005-0887189 in book N/A, page N/A of Official Records in the office of the Recorder of Riverside County, California, Date of Sale: 12/29/2021 at 9:00 AM Place of Sale: In front of the Corona Civic Center, 849 W. Sixth Street, Corona, CA 92882. Amount of unpaid balance and other charges: \$277,352.13 Street Address or other common designation of real property: 2007 HOOPER DRIVE SAN JACINTO, CALIFORNIA 92583 A.P.N.: 551-383-006 The undersigned Trustee disclaims any liability for any incorrectness of the street address or other common designation, if any, shown above. If no street address or other common designation is shown, directions to the location of the property may be obtained by sending a written request to the beneficiary within 10 days of the date of first publication of this Notice of Sale. NOTICE TO POTENTIAL BIDDERS: If you are considering bidding on this property lien, you should understand that there are risks involved in bidding at a trustee auction. You will be bidding on a lien, not on the property itself. Placing the highest bid at a trustee auction does not automatically entitle you to free and clear ownership of the property. You should also be aware that the lien being auctioned off may be a junior lien. If you are the highest bidder at the auction, you are or may be responsible for paying off all liens senior to the lien being auctioned off, before you can receive clear title to the property. You are encouraged to investigate the existence, priority, and size of outstanding liens that may exist on this property by contacting the county recorder's office or a title insurance company, either of which may charge you a fee for this information. If you consult either of these resources, you should be aware that the same lender may hold more than the mortgage or deed of trust on the property. NOTICE TO PROPERTY OWNER: The sale date shown on this notice of sale may be postponed one or more times by the mortgagee, beneficiary, trustee, or a court, pursuant to Section 2924g of the California Civil Code. The law requires that information about trustee sale postponements be made available to you and to the public, as a courtesy to those not present at the sale. If you wish to learn whether your sale date has been postponed, and, if applicable, the rescheduled time and date for the sale of this property, you may call (800) 683-2468 or visit this Internet Web site www.servicelinkasap.com, using the file number assigned to this case FHAC.277-768. Information about postponements that are very short in duration or that occur close in time to the scheduled sale may not immediately be reflected in the telephone information or on the Internet Web site. The best way to verify postponement information is to attend the scheduled sale. For sales conducted after January 1, 2021: NOTICE TO TENANT: You may have a right to purchase this property after the trustee auction pursuant to Section 2924m of the California Civil Code. If you are an "eligible tenant buyer," you can purchase the property if you match the last and highest bid placed at the trustee auction. If you are an "eligible bidder," you may be able to purchase the property if you exceed the last and highest bid placed at the trustee auction. There are three steps to exercising this right of purchase. First, 48 hours after the date of the trustee sale, you can call (800) 683-2468, or visit this internet website www.servicelinkasap.com, using the file number assigned to this case FHAC.277-768 to find the date on which the trustee's sale was held, the amount of the last and highest bid, and the address of the trustee. Second, you must send a written notice of intent to place a bid so that the trustee receives it no more than 15 days after the trustee's sale. Third, you must submit a bid so that the trustee receives it no more than 45 days after the trustee's sale. If you think you may qualify as an "eligible tenant buyer" or "eligible bidder," you should consider contacting an attorney or appropriate real estate professional immediately for advice regarding this potential right to purchase. Date: 11/23/2021 PROBER AND RAPHAEL, ALC 20750 Ventura Blvd. #100 Woodland Hills, California 91364 Sale Line: (800) 683-2468 Rita Terzyan, Trustee Sale Officer A-FN4738273 12/08/2021, 12/15/2021, 12/22/2021 Hemet News

IF YOU ARE A CREDITOR or a contingent creditor of the decedent, you must file your claim with the court and mail a copy to the personal representative appointed by the court within the later of either (1) four months from the date of first issuance of letters to a general personal representative, as defined in section 58(b) of the California Probate Code, or (2) 60 days from the date of mailing or personal delivery to you of a notice under section 9052 of the California Probate Code.

Other California statutes and legal authority may affect your rights as a creditor. You may want to consult with an attorney knowledgeable in California law.

YOU MAY EXAMINE the file kept by the court. If you are a person interested in the estate, you may file with the court a Request for Special Notice (form DE-154) of the filing of an inventory and appraisal of estate assets or of any petition or account as provided in Probate Code section 1250. A Request for Special Notice form is available from the court clerk.

Attorney for Petitioner: COLLEEN S. PATTERSON LAW OFFICE OF COLLEEN S. PATTERSON 41591 E. FLORIDA AVE., SUITE H, HEMET, CA 92544 (951) 658-4900 Hemet News: 12/09, 12/15, 12/16

IF YOU ARE A CREDITOR or a contingent creditor of the decedent, you must file your claim with the court and mail a copy to the personal representative appointed by the court within the later of either (1) four months from the date of first issuance of letters to a general personal representative, as defined in section 58(b) of the California Probate Code, or (2) 60 days from the date of mailing or personal delivery to you of a notice under section 9052 of the California Probate Code.

Other California Statutes and legal authority may affect your rights as a creditor. You may want to consult with an attorney knowledgeable in California law.

You may examine the file kept by the court. If you are a person interested in the estate, you may file with the court a Request for Special Notice (form DE-154) of the filing of an inventory and appraisal of estate assets or of any petition or account as provided in Probate Code section 1250. A Request for Special Notice form is available from the court clerk.

Attorney for Petitioner: COLLEEN S. PATTERSON LAW OFFICE OF COLLEEN S. PATTERSON 41591 E. FLORIDA AVE., SUITE H, HEMET, CA 92544 (951) 658-4900 Hemet News: 12/09, 12/15, 12/16

Legal Notice

Legal Notice

ORDER TO SHOW CAUSE FOR CHANGE OF NAME CASE NUMBER: CVSW2109623 PETITION OF: Terry Ray Sandoval FOR CHANGE OF NAME SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

TO ALL INTERESTED PERSONS: 1. Petitioner: Terry Ray Sandoval filed a petition with this court for a decree changing names as follows: Present name: Terry Ray Sandoval to Proposed name: Terry Ray Jenkins

THE COURT ORDERS that all persons interested in this matter appear before this court at the hearing indicated below to show cause, if any, why the petition for change of name should not be granted. Any person objecting to the name changes described above must file a written objection that includes the reasons for the objection at least two court days before the matter is scheduled to be heard and must appear at the hearing to show cause why the petition should not be granted. If no written objection is timely filed, the court may grant the petition without a hearing.

NOTICE OF HEARING
 a. Date: 12-30-21
 Time: 8:00 am Dept.: S101
 b. The address of the court is 30755-D Auld Road, Murrieta, CA 92563.

3. A copy of this Order to Show Cause shall be published at least once each week for four successive weeks prior to the date set for hearing on the petition in the following newspaper of general circulation, printed in this county: The Press-Enterprise Date: NOV 15 2021 Jeffrey Zimel JUDGE OF THE SUPERIOR COURT Press-Enterprise: 12/01, 12/08, 12/15, 12/22

Legal Notice

T.S. No. 19-02146-FM-CA Title No. 1216220 A.P.N. 458-372-002 NOTICE OF TRUSTEE'S SALE. YOU ARE IN DEFAULT UNDER A DEED OF TRUST DATED 03/05/2018. UNLESS YOU TAKE ACTION TO PROTECT YOUR PROPERTY, IT MAY BE SOLD AT A PUBLIC SALE. IF YOU NEED AN EXPLANATION OF THE NATURE OF THE PROCEEDING AGAINST YOU, YOU SHOULD CONTACT A LAWYER. A public auction sale to the highest bidder for cash, cashier's check(s) must be made payable to National Default Servicing Corporation), drawn on a state or national bank, a check drawn by a state or federal credit union, or a check drawn by a state or federal savings and loan association, savings association, or savings bank specified in Section 5102 of the Financial Code and authorized to do business in this state will be held by the duly appointed trustee as shown below, of all right, title, and interest conveyed to and now held by the trustee in the hereinafter described property under and pursuant to a Deed of Trust described below. The sale will be made in an "as is" condition, but without covenant or warranty, expressed or implied, regarding title, possession, or encumbrances, to pay the remaining principal sum of the note(s) secured by the Deed of Trust, with interest and late charges thereon, as provided in the note(s), advances, under the terms of the Deed of Trust, interest thereon, fees, charges and expenses of the Trustee for the total amount (at the time of the initial publication of the Notice of Sale) reasonably estimated to be set forth below. The amount may be greater on the day of sale. Trustor: Zulma P. Castillo, as single woman and Marlene Castillo, a single woman as joint tenants Duly Appointed Trustee: National Default Servicing Corporation Recorded 03/07/2018 as Instrument No. 2018-0086650 (or Book, Page) of the Official Records of Riverside County, CA. Date of Sale: 01/04/2022 at 9:00 AM Place of Sale: In front of the Corona Civic Center, 849 W. Sixth Street, Corona, CA 92882. Estimated amount of unpaid balance and other charges: \$415,505.74 Street Address or other common designation of real property: 33298 Hitching Post Drive Winchester, CA 92596 A.P.N.: 458-372-002 The undersigned Trustee disclaims any liability for any incorrectness of the street address or other common designation, if any, shown above. If no street address or other common designation is shown, directions to the location of the property may be obtained by sending a written request to the beneficiary within 10 days of the date of first publication of this Notice of Sale. If the Trustee is unable to convey title for any reason, the successful bidder's sole and exclusive remedy shall be the return of monies paid to the Trustee, and the successful bidder shall have no further recourse. The requirements of California Civil Code Section 2923.5(b)/2923.55(c) were fulfilled when the Notice of Default was recorded. NOTICE TO POTENTIAL BIDDERS: If you are considering bidding on this property lien, you should understand that there are risks involved in bidding at a trustee auction. You will be bidding on a lien, not on the property itself. Placing the highest bid at a trustee auction does not automatically entitle you to free and clear ownership of the property. You should also be aware that the lien being auctioned off may be a junior lien. If you are the highest bidder at the auction, you are or may be responsible for paying off all liens senior to the lien being auctioned off, before you can receive clear title to the property. You are encouraged to investigate the existence, priority, and size of outstanding liens that may exist on this property by contacting the county recorder's office or a title insurance company, either of which may charge you a fee for this information. If you consult either of these resources, you should be aware that the same lender may hold more than one mortgage or deed of trust on the property. NOTICE TO PROPERTY OWNER: The sale date shown on this notice of sale may be postponed one or more times by the mortgagee, beneficiary, trustee, or a court, pursuant to Section 2924g of the California Civil Code. The law requires that information about trustee sale postponements be made available to you and to the public, as a courtesy to those not present at the sale. If you wish to learn whether your sale date has been postponed, and, if applicable, the rescheduled time and date for the sale of this property, you may call or visit this Internet Web site www.ndscorp.com/sales, using the file number assigned to this case 19-02146-FM-CA. Information about postponements that are very short in duration or that occur close in time to the scheduled sale may not immediately be reflected in the telephone information or on the Internet Web site. The best way to verify postponement information is to attend the scheduled sale. Date: 11/18/2021 National Default Servicing Corporation c/o Tiffany & Bosco, P.A., its agent, 1455 Frazee Road, Suite 820 San Diego, CA 92108 Toll Free Phone: 888-264-4010 Sales Line 855-219-8501; Sales Website: www.ndscorp.com By: Rachael Hamilton, Trustee Sales Representative 12/01/2021, 12/08/2021, 12/15/2021 CPP351722 Hemet News

IF YOU ARE A CREDITOR or a contingent creditor of the decedent, you must file your claim with the court and mail a copy to the personal representative appointed by the court within the later of either (1) four months from the date of first issuance of letters to a general personal representative, as defined in section 58(b) of the California Probate Code, or (2) 60 days from the date of mailing or personal delivery to you of a notice under section 9052 of the California Probate Code.

Other California statutes and legal authority may affect your rights as a creditor. You may want to consult with an attorney knowledgeable in California law.

YOU MAY EXAMINE the file kept by the court. If you are a person interested in the estate, you may file with the court a Request for Special Notice (form DE-154) of the filing of an inventory and appraisal of estate assets or of any petition or account as provided in Probate Code section 1250. A Request for Special Notice form is available from the court clerk.

Attorney for Petitioner: COLLEEN S. PATTERSON LAW OFFICE OF COLLEEN S. PATTERSON 41591 E. FLORIDA AVE., SUITE H, HEMET, CA 92544 (951) 658-4900 Hemet News: 12/09, 12/15, 12/16

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