

# **General Order 103** **Working Group Report**

**California Public Utilities Commission**  
**Division of Water and Audits**

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## ***I. Introduction/ Overview***

### ***A. Executive Summary***

This Working Group (WG) Report provides the WGs' recommended changes to General Order 103, "Rules Governing Water Service Including Minimum Standards for Design & Construction" which resulted from an extensive WG evaluation process that took place from March through June 2008. This Report also provides: 1) an overview of the WG evaluation process, 2) a summary of the specific WGs' recommended GO 103 changes, and 3) Division of Water and Audits (DWA) Staff's recommendations.

The WGs' recommended changes to GO 103 are aligned with the Commission's objectives outlined in the December 20, 2007, Order Instituting Rulemaking (R.07-12-015.) Listed below are the five objectives the Commission outlined in the Rulemaking, a summary of the WGs' GO 103 recommended revisions associated with each objective, as well as several key issues that may need to be addressed:

#### ***1) Add minimum standards for operation and maintenance of water and sewer systems***

- a) The applicability of GO 103 was expanded to include wastewater system utilities, a new broader term recommended by the WG participants that includes sewer service systems and recycled water systems associated with customer services that regulated water and/or sewer utilities are providing or may provide in the future.
- b) The minimum Operation and Maintenance (O&M) standards for water utilities were updated to current industry standards and made consistent with the California Department of Public Health's (Department) Waterworks Standards, California Code of Regulations (CCR) Title 22, and other applicable regulations.
- c) The O&M requirements were revised to require water utilities to prepare and submit to DWA O&M procedures instead of O&M plans;
  - i) Submission of an O&M plan by a water utility is required when the utility prepares an O&M plan for the Department

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due to deficiencies in a utility's system(s) operation or maintenance.

- ii) Wastewater utilities are required to submit to DWA their O&M plans that are required by the State Water Resources Control Board.

**2) Add provisions to emphasize the Commission's oversight over water quality compliance**

- a) The water quality section was revised to ensure Commission oversight of water safety in conformity with the *Hartwell Corp. v. Superior Court* Decision and the Commission's Rate Case Plan Decision (D.07-05-062.)
- b) Provisions were added to require water utilities to comply with applicable State and Federal water quality regulations;
- c) Notification provisions were added to require water utilities to notify the Commission in the event that the Department or US Environmental Protection Agency (EPA) finds a utility out of compliance with water quality regulations.
- d) The General Intent section was modified to emphasize the Commission's oversight role.

**3) Update water system design and construction standards to current industry standards**

- a) Water system design and construction standards were updated to current industry standards and made consistent with the Department's Waterworks Standards, CCR Title 22, and other applicable standards.

**4) Add new customer service quality standards based on Vermont Gas System's (VGS) Performance and Reporting Plan**

- a) A new section has been added to incorporate customer service performance standards and reporting requirements for water and wastewater service utilities which were developed through the WG process using the VGS Performance and Reporting

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Plan. This new section sets the reporting requirements for customer service performance for telephone response, billing, meter reading, and work completion.

- b) The more detailed customer service performance standards are contained in Attachment 2. DWA recommends that these standards be applicable to Class A and B water utilities only because of the technical requirements and resources needed to implement them.
- c) Applicability of the GO 103 customer service standards and reporting requirements for Class C and D water utilities needs to be evaluated.
- d) Requirements for responding to customer and regulatory complaints were also added to the GO.

**5) *Remove GO 103 sections that are duplicative of current tariff provisions***

- a) Duplicate and non-applicable sections were removed from the GO as indicated in section II of this report.
- b) Because the tariff rules now take precedence over GO 103 language, the language in the tariff rules may need to be updated to the same minimum standards as the GO 103 rules.

***Summary of additional recommended changes:***

- 6) GO 103 definitions were updated and made consistent with the Department's Waterworks Standards, CCR Title 22.
- 7) Preemptive Authority language was added to the GO to express the Commission's preemption of local authorities with respect to regulatory authority over water and sewer construction and/or expansion projects of water and wastewater system utilities, consistent with existing preemptive authority for Electric utilities, per Government Code Section 53091.
  - a) The Commission will need to assess whether this preemptive authority can be added to the GO without providing notice and

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opportunity for comment to the affected local jurisdictions, or determine the type of notification required.

- 8) The maximum periods that meters can remain in service without being tested were changed back to the original periods based on the WG discussions and current utilities' meter testing and replacement practices.
  - a) The Division of Ratepayer Advocates (DRA) continues to advocate for shorter time periods.
  - b) Language was added that gives water utilities the ability to extend the maximum periods via an advice letter filing.

A more detailed overview of the WGs' proposed changes for each GO section is provided in section II of this report.

***B. Working Group Process***

On February 25, 2008 DWA held a GO 103 workshop which led to the establishment of a working group process for the evaluation of the proposed GO 103 changes (see the attached March 18, 2008 General Order 103 Workshop Report.) Five WGs were created based on specific GO 103 subject areas and sections specified below in Table 1. A WG lead was assigned to each WG to help coordinate and facilitate the WG meetings. Table 1 also includes the WG meeting dates and locations.

**Table 1**  
**Working Group Sections and Meetings**

	<b>WG1</b>	<b>WG2</b>	<b>WG 3</b>	<b>WG4</b>	<b>WG 5</b>
<b>Assigned GO 103 Sections</b>	<p><b>Section I--</b> Definitions only</p> <p><b>Section III--</b> Standards of Design and Construction</p> <p><b>Section II--</b> Standards of Service:</p>	<p><b>Section I--</b> Definitions only</p> <p><b>Section II --</b> Standards of Service: Water Quality, Testing of Water</p>	<p><b>Section I--</b> Definitions only</p> <p><b>Section VII—</b> Operation and Maintenance</p> <p><b>Section IV –</b> Measurement of Service</p>	<p><b>Section I –</b> (All)</p> <p><b>Section V –</b> Rates &amp; Billing</p> <p><b>Section VII—</b> Customer Relations-- Performance Standards</p>	<p>Working Group 5 GO 103 sewer standards</p>

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	Water Supply Requirements and Quantity of Water  <b>Section VI--</b> Fire Protection Standards				
<b>WG meeting dates &amp; locations</b>	March 27 and April 3, 2008 in San Jose, CA	April 4, 2008 in San Jose, CA	April 10, 2008 in Chula Vista, CA	March 25 and April 18, 2008 in Santa Clarita, CA	June 2, 2008 in Pacific Grove, CA. and June 26, 2008 in San Francisco, CA

The following working group guidelines were set and followed by DWA staff and WG leads:

1. The first WG meetings were formally noticed 10-days prior to the meeting. No formal notifications were required for subsequent meetings, but notices of the meetings were made to each WG distribution list.
2. At any time in the WG process, anyone could request to be added to the WG distribution list by contacting the WG leads.
3. At any point in the WG process, the WGs could request additional guidance from the assigned ALJ; these requests were to be coordinated with staff from the DWA. No requests were made from any of the WGs.
4. Additional workshop(s) could be scheduled to address global WG issues that might require input from all of the respondents to the Rulemaking. One additional workshop was held on June 24, 2008 at the Commission's Courtyard Room in San Francisco to review all of the WGs' recommended GO 103 changes and was open to all WG participants.
5. August 15, 2008 was set as the due date for the WGs to submit their final work products.

WG meetings were conducted in southern and northern California as indicated in Table 1 above to accommodate all WGs' participants. Conference call-in numbers were provided for all WG meetings, and when feasible WG meetings were web cast. All WG meetings were well attended and included representation from class A and B water utilities, the DRA and

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The Utility Reform Network (TURN); see attached sign-in sheets for a listing of attendees. The WG process worked well thanks to the cooperation and participation of the water utilities, DRA and TURN.

#### **C. GO 103 Review Process**

The general approach used by each WG was to review the Commission's proposed GO 103 changes for the specific assigned sections and to revise the GO based on the WG discussions. A GO 103 working draft was created from each WG meeting that included the WG's proposed revisions (redlined) and comments to indicate the areas of concern or disagreement by WG participant(s). The final revised GO 103 draft with all of the WGs' recommended revisions is included as Attachment 1 to this report.

## **II. Working Groups' Proposed Revisions to General Order 103**

This section of the report provides a summary of the specific WGs' recommended revisions to GO 103 sections, and also includes the areas upon which WG participant(s) could not reach agreement and/or that may need to be addressed by the Commission.

### **A. GO 103 Revisions**

#### **Section I- General**

##### **1. Intent**

The applicability of the GO 103 was expanded to include wastewater system utilities, a new broader term recommended by the WG participants that includes sewer service systems, recycled water systems, or grey water systems, which are customer services that regulated water and/or sewer utilities are providing or may provide in the future.

##### **2. Definitions**

All new and updated definitions were reviewed by the WGs, and additional definitions were added.

- a) The following definitions were added or updated -- Wastewater Meter, Customer Service Lateral, Grey Water, Utility Service Lateral, and the

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names of the appropriate regulatory agencies that regulate wastewater service utilities.

- b) Definitions for water systems' components were made more explicit to differentiate between water and wastewater system components (e.g., water meter vs. wastewater meter.)
- c) Definitions were made consistent with the Department's Waterworks Standards, CCR Title 22, and other applicable standards;
- d) Acronyms were added that are used and referenced in the body of the GO.

### **3. Information Available to the Public**

The following requirements were added to the information that a utility needs to maintain and make available to the public:

- a) Low-income ratepayer assistance programs;
- b) Customer rights and obligations;
- c) Information on obtaining emergency assistance; and
- d) How customers can make suggestions or complaints

A requirement was also added to require utilities to have most of this information available to the public in electronic form on the company's website, if a website is maintained.

***DRA recommends requiring class A and B utilities to have a website that contains links to the all of the information required above. DRA's position is that water companies' websites should have the capability to perform most routine customer transactions.***

### **4. Access to Property**

No substantive changes were made to this section.

### **5. Complaints**

The definition of complaint was made more explicit to clearly specify what constitutes a complaint that requires an investigation or action on the part of the utility.

### **6. Accidents/Acts of Terror**

No substantive changes were made to this section.

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**7. Reports and Notifications to the Commission**

New language was added to indicate that reports and notifications to the Commission required by this GO shall be filed with the DWA, or its successor with a copy sent to the DRA, or its successor.

**8. Exemptions and Variances From These Rules**

Language was added to indicate that a utility may request a variance from these rules via a Tier 3 Advice Letter for items of minor importance or temporary in nature (six months or less.)

**9. Preemption of Local Authority**

This is a new section to the GO, which was proposed by the water utilities and supported by DRA and would express the Commission's preemption of local authorities with respect to regulatory authority over water and sewer construction and/or expansion projects of water and wastewater system utilities.

Water utilities requested adding this language to put them on a comparable basis with electric utilities, per Government Code Section 53091.

***We anticipate that the Commission will to address whether such preemptive language can be added to the GO without providing notice and opportunity to comment to the affected local jurisdictions, or determine the procedure that needs to be provided.***

**Section II- Standards of Service**

**1. General**

This section was re-written to simplify the section. Language was added to require wastewater utilities to comply with the State Board, Regional Board, and County Health Department permit requirements and all applicable regulations.

**2. Water Quality and Supply Requirements**

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*A. Water Quality*

The water quality section was revised to document and facilitate Commission oversight of water safety in conformity with the *Hartwell Corp. v. Superior Court* Decision and the Commission's Rate Case Plan Decision (D.07-05-062).

The following requirements were added:

- i. Water utilities are required to comply with applicable State and Federal laws pertaining to water quality and applicable regulations of the Department and US EPA;
- ii. Water utilities are required to notify the Commission when a water utility is found out of compliance by the Department or US EPA or notifies customers of a water quality event;
- iii. Water utilities are required to have samples of their water analyzed by an accredited water laboratory;
- iv. Recycled water must comply with the Department's recycled water requirements;

The water quality expert language was refined in accordance with D.07-05-062. An additional provision was added to give wastewater utilities the authority to disconnect customers that discharge unauthorized waste into a wastewater system.

*B. Quantity of Water*

This section was revised and made consistent with the Department's Waterworks Standards, CCR Title 22.

(1) Source.

GO language was augmented to indicate that water supplied by a utility can be produced from a source or sources described in the utility's Urban Water Management Plan (UWMP) that has been reviewed by the Commission in its most recent General Rate Case (GRC) or in an amendment that the utility has submitted for review to the Commission's DWA.

(2) Operation of Supply System

GO language was revised to require production from groundwater and

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surface water sources to comply with the Department's applicable Waterworks Standards, and in accordance with a UWMP that has been reviewed by the Commission in the utility's most recent GRC.

(3) Water System Capacity

The requirements for water system capacity, Maximum Daily Demand (MDD) and Peak Hour Demand (PHD), were revised and made consistent with the Department's Waterworks Standards, CCR Title 22, Section 64554.

Language was added to indicate that if at any time, the system does not have the required capacity, the utility shall request a service connection moratorium until it can demonstrate the source capacity has been increased to meet system requirements.

(4) Sewer System Capacity

Language was added to require that once use of a utility sewer system's facilities has reached 80% of design average daily flow, as specified in the permit as issued by the Regional Board, the sewer utility must request a service connection moratorium until it can demonstrate the system capacity has been increased to meet system requirements.

**3. Continuity of Service**

*A. Emergency Interruptions*

No substantive changes were made to this section.

*B. Scheduled Interruption*

No substantive changes were made to this section.

*C. Records of Interruptions*

The required information for the records of interruption was moved to Appendix C of the GO.

*D. Reports to the Commission*

No substantive changes were made to this section.

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**4. Water Supply Requirements**

*A. Measuring Devices*

No changes were made to this section.

*B. Records*

No substantive changes were made to this section.

Note: Respondents need to address influent and effluent flows, and plant discharge fro recycled water.

**Section III- Standards of Design and Construction**

**1. General**

Language was revised to require the design and construction of utility's water or wastewater system(s) to conform to acceptable engineering standards and practices. In addition, systems must be designed and operated to provide reasonably adequate and safe service to its customers in accordance with the requirements of the Department and this General Order.

Section 2, Application for Certificate of Public Convenience and Necessity was deleted because it is not a standard of design and it is covered by other rules and tariffs.

**2. Materials and Specifications**

*A. Qualification*

GO language was revised to require materials used to construct component parts of water system(s) shall be capable of withstanding the internal and external forces to which they may be subjected in service, per applicable AWWA Standards.

Reference to the term "lead free" was updated per the California Health & Safety Code Section 116875.

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Similar language was added to require materials used to construct component parts of wastewater system(s) capable of withstanding the internal and external forces to which they may be subjected in service per applicable standards.

*B. Specifications*

No changes were made to this section.

*C. Newly Developed Materials and Equipment*

No changes were made to this section.

**3. Distribution Systems**

*A. Depth of Mains*

The language in the GO was simplified, but requires all pipe and service lines that are installed using the open cut method to be installed with continuous tracer tape or wire to be detectable in the future.

*B. Layouts of Water Mains*

No substantive changes were made to this section.

***Section C, Minimum Water Main Diameter and Length of Run has been deleted because it was adequately covered under minimum pipe sizes section below and length was no longer applicable.***

*C. Minimum Pipe Sizes*

No changes were made to this section.

*D. Water Main Separations*

The requirements for minimum water main separation were made consistent with the Department's CCR, Title 22, Waterworks Standards, Section 64572.

*E. Water Main Valves*

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The requirements for water valves were revised and made consistent with the Department's Water Works Standards, CCR Title 22, Sections 64577 and 64578.

***Section G, Minimum Water Main Valve Construction Standards was deleted because main valves are covered in the Material Standards for Water Mains section below.***

#### **4. Material Standards for Water Mains**

The requirements for all new water main materials used in the distribution system were revised and made consistent with the Department's Waterworks Standards, CCR Title 22, Section 64570. The requirements were also augmented to require utilities to consider the cost effectiveness of the materials it selects. The AWWA standards table was deleted because it is part of the Waterworks Standards referenced herein.

#### **5. Service Connections Pipe and Fittings**

##### *A. General*

No changes were made to this section.

##### *B. Conditions for Adding Service Connections and Pipes*

No substantive changes were made to this section.

##### *C. Size of Service Line*

No significant changes were made to this requirement. The table in this section that provides a guide for the installation of ¾-inch and 1-inch service was deleted.

##### *D. Depth of Service Line*

No changes were made to this section.

#### **6. Distribution Reservoirs**

The distribution reservoirs requirements were made consistent with the Department's Waterworks Standards, CCR Title 22, Section 64585. The

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specific language detailing the requirements was deleted and replaced by the Waterworks reference.

***Subsurface Distribution Reservoirs section was deleted because this subcategory of distribution reservoirs is covered in the Distribution Reservoirs section above.***

#### **7. Recycled Water and Reservoirs**

The GO requirement was revised to require the Department's approval before a utility can use a reservoir that is directly augmented with recycled water as a source of supply.

#### **8. Reliability for Water Facilities**

The required reliability standards for the design and construction of all new and existing surface water treatment plants were made consistent with those of the Department's Waterworks Standards, CCR Title 22, Section 64659.

The new reliability requirement was added to require all critical equipment not addressed by Section 64659 above shall have adequate redundancy and reliability, which can include backup power/generation.

#### **9. Sewer Systems**

##### *A. Mains and Submains*

No changes were made to this section.

##### *B. Service Laterals*

The minimum size requirement for service lateral was changed from 6 to 4 inches based on the input received from the utility experts/engineers.

The depth requirement was deleted.

A requirement to have the utility's service laterals maintained at 2% minimum and 4% maximum slope was added.

#### **Section IV- Measurement of Service**

##### **1. Method of Measuring Service**

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*A. Metering*

Language was added to require all water provided by water utilities to be metered in accordance with PU Code Section 781 which prohibits mandatory metering, absent of a cost effectiveness finding or that conservation will be achieved.

*B. Registration of Meter*

No substantive changes were made to this section.

*C. Irrigation Meters*

No changes were made to this section.

*D. Meter Readings Report to the Commission*

No substantive changes were made to this section.

**2. Meter Test Facilities and Equipment**

*A. Test Facilities*

No substantive changes were made to this section.

*B. Shop Equipment*

The specific reference to the applicable AWWA M6 standard for the accuracy of the test equipment and test procedures was added.

*C. Test Measurement Standards*

No substantive changes were made to this section.

**3. Accuracy Requirements of Water Meters**

*A. General*

No changes were made to this section.

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*B. Test Flows*

Reference to AWWA M6 standard was made explicit and the table associate with this standard was deleted.

Cautionary language was added for meter bench testing for small meters (5/8 x 3/4-inch through 2-inch), a multi-jet meter and a positive displacement meter, to ensure that they are not to be tested in-line.

The tests flows table for new, rebuilt and repaired multi-jet type cold water meters was deleted because the tests flows are included in the specified AWWA standard.

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*C. Determination of Accuracy*

Meter testing accuracy requirement language was revised to include the applicable M6 AWWA standard.

*D. Sealing of Meter*

No changes were made to this section.

*E. Record of Test*

No substantive changes were made to this section.

**4. Initial Tests of Meters**

Meter storage requirement language was deleted because it is no longer applicable.

**5. Repaired or Tested Meters**

No changes were made to this section.

**6. Periodic Tests of Water Meters**

*A. General*

Language was added that would allow utilities to request to extend the maximum period that a meter can remain in service without retesting via an Advice Letter filing and based on economic factors and meter accuracy.

The maximum periods that a meter can remain in service without being tested were changed back to the original periods based on the WG discussions.

***DRA proposed reducing the maximum period that a meter could remain in service without retesting the meters. DRA proposed 15 years for meters less than 1-inch, 13 years for 1-inch meters, and 8 years for meters larger than 1-inch.***

***Water utilities support the original maximum periods based on***

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***current operating practices, manufacturers' warranties, and associated cost impacts on customers. Water utilities indicated that each utility has developed its own meter testing and replacement plan based on a number of economic factors and criteria listed above. In addition, the general practice by water utilities is to replace the smaller than 1-inch meters and not test smaller size meters because it is not cost effective to do so.***

***DWA staff does not support reducing the current maximum periods without an economic analysis or evidence to indicate that the current periods are inadequate. In addition, the current requirement does not prohibit the Commission from requiring testing of a random sample of meters at different frequencies, if there is evidence of high levels of meter inaccuracy, or high percentages of accounted water use.***

***B. Frequency of periodic tests***

No changes were made to this section.

***C. Report of Periodic Tests of Meters***

No changes were made to this section.

**7. Meter Records**

***A. Contents and Retention of Meter Records***

Language was added to require utilities to retain a written record of meters that are changed out.

Language was also added to require utilities to maintain meter records for the useful life of the meter.

**V. Rates and Billing**

**1. Filing of Tariffs**

No changes were made to this section.

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**2. Information on Bills**

No changes were made to this section.

**3. Sewer Service**

Additional language was added for billing requirements for sewer service.

**VI. Fire Protection Standards**

**1. Design Requirements**

*A. Standards of Local Fire and Protection Agency's Govern*

No changes were made to this section.

*B. Application of the Utility's Main Extension Rule*

No significant changes were made to this section.

**2. Initial Construction, Extension, or Modification**

*A. Fire Flow Table*

The fire flow language was revised to require water facilities that are constructed, extended, or modified to be designed with the capacity to provide a minimum of two hours, at a minimum of 20 psi, the fire flow required by the California Fire Code 2007, Appendix B.

Section B, Grandfathering Section was deleted because it was duplicative.

**3. Replacement of Mains**

No substantive changes were made to this section.

***Original Section 4, Flow Tests Section was deleted because the flow test requirements are included in 2 (A) above.***

**4. Fire Hydrants**

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No substantive changes were made to this section.

#### **5. Fire Hydrant Service Agreement**

No substantive changes were made to this section.

### **VII. Operation and Maintenance**

#### **1. Operation and Maintenance (O&M) Procedures and Plans**

##### *A. Submission of O&M Procedures for Water Utilities to the Commission*

The language in this section was revised. The new language requires water utilities to prepare and submit to DWA O&M procedures instead of O&M plans. Submission of an O&M plan by a water utility is required when the utility prepares an O&M plan for the Department due to deficiencies in a utility's system(s) operation or maintenance. This compromise was reached through the WG process after water utilities indicated that the preparation of O&M plans for all of their water systems would be too burdensome and costly.

Additional language was also added to provide confidentiality protection for the O&M procedures filings, per Pub. Util. Code 583.

Note: the Commission may need to set a timeline for the submission of O&M procedures.

##### *B. Contents of O&M Procedures for Water Utilities*

The following O&M procedures were added or revised:

1. The operations and maintenance schedule for each purchased water connection procedure was added.
2. The training protocols for use by employees for interacting with customers;
3. The schedule and procedures for either testing backflow prevention assemblies or notifying customers of their obligation to test backflow prevention assemblies;
4. The schedule and procedures for routine maintenance of water main valves, combination air vacuum release valves, fire hydrants,

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and valves; and

5. The qualifications and training of operating personnel including water treatment and cross connection certification;

***Section C, Updates Section-- the required updates for O&M Plans and Procedures and Emergency/Disaster Response Plan have been added to Section VII(4)B.***

#### *C. Submission of O&M Plans for Water Utilities to the Commission*

This requirement was revised to require water utilities to submit O&M plans to the Commission's DWA, if the Department requires a water utility to prepare an O&M plan due to a deficiency in their system operation or maintenance.

#### *D. Submission of O&M Plans for Wastewater System Utilities to the Commission*

New language was added that requires wastewater system utilities to submit to the Commission's DWA, subject to the confidentiality provisions, a copy of the O&M Plan required by the State Water Board General Order 0003-2006.

## **2. Asset management requirements**

Asset management requirements were moved to this section of the GO and a sanitary sewer management plan requirement was added for sewer systems.

DRA recommends adding more specificity to this section, adding language to require utilities to report to the Commission on their plans to retrofit existing facilities, use of cathodic protection programs, and other efforts to minimize corrosion and extend service life. DWA supports this addition and has incorporated it into the GO.

## **3. Emergency/Disaster Response Plan**

The Emergency/Disaster Response Plan requirement was made consistent with the Department's requirements.

Language was added to require sewer system utilities to have an Emergency Response Plan pursuant to the State Board GO-0003, 2006.

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**4. Records and Reports**

Record retention Appendix was changed from B to C.

*A. System Plans, Maps, Drawings and Other Records*

No substantive changes were made to this section. The minimum records language was augmented to include the applicable components for wastewater systems.

***Results of Laboratory Analysis Section was moved to the Records Retention Appendix C.***

*B. Required Updates*

This requirement was modified to require updates of the records and plans in VII, (1), (3), and (4) above when significant changes occur.

*C. Underground Damage Prevention*

Language was added to require utilities to comply with all California regulations for underground damage prevention.

***Flushing the System Section was deleted.***

**5. Water Treatment and Water Distribution Operators**

*A. General*

The water treatment and water distribution certifications requirements were updated and made consistent with those of the Department.

*B. Treatment Facility Operator Certification*

Language was revised to require all treatment facility operators to be certified by the Department for the functions they perform.

*C. Distribution System Operator Certification*

No changes were made to this section.

*D. Cross-Connection Operator Certification*

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New language was added to require that all cross-connection operators be certified by the AWWA, or equivalent organization.

#### *E. Wastewater Treatment and Wastewater Distribution Operators*

Certification requirements were added for wastewater treatment and wastewater distribution operators.

### **6. Pressures**

#### *A. Variations in Pressure*

No substantive changes were made to this section.

#### *B. New Systems*

The required minimum operating pressure for new systems was revised from not less than 40 psi, at all times, to not less than 40 psi during Peak Hour Demand (PHD.)

Language was added to allow utilities to request a waiver, if a utility cannot meet this pressure requirement, as a result of cost and/or system limitations.

#### *C. Changes to existing distribution systems*

The operating pressure requirement for changes to existing distribution systems was changed from not less than 30 psi to 40 psi. The required pressure is to be maintained at all service connections during PHD and not less than 20 psi based on user average day demand plus local fire flow.

Language was also added to allow utilities to request a waiver, if a utility cannot meet this pressure requirement due to cost and/or system limitations.

#### *D. Waivers*

No substantive changes were made to this section.

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***Hydraulic Analysis of the Transmission and Distribution System was deleted.***

***E. Delineation of Minimum Normal Operating Pressures***

No changes were made to this section.

***F. Pressure Recorders***

No substantive changes were made to this section.

***G. Pressure Surveys***

No substantive changes were made to this section.

**VIII. Customer Service and Reporting Standards for Water and Wastewater Service Utilities**

- a) A new section has been added to incorporate customer service performance standards and reporting requirements for water and wastewater service utilities which were developed through the WG process using the VGS Performance and Reporting Plan. This new section sets the reporting requirements for customer service performance for telephone response, billing, meter reading, and work completion.
- b) The more detailed customer service performance standards are contained in Attachment 2. DWA recommends that these performance standards be applicable to Class A and B water utilities only because of the technical and resources requirements needed to implement them.
- c) Applicability of the GO 103 customer service standards and reporting requirements for Class C and D water utilities need to be evaluated.
- d) Requirements for responding to customer and regulatory complaints were also added to the GO.

See Attachment 2 for the specific customer service and reporting standards.

DRA notes that Reporting Standards, as written in Section II.B of

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Attachment 2 do not have any type of penalty or consequence tied to the standard if the utility fails to meet any of the performance standards.

DRA recommends adding a provision to the Work Completion Performance Standards, Section II.G.1 in Attachment 2, to require utilities to pay customers if they do not keep a scheduled appointment.

***IV. Conclusion***

The WGs' proposed changes to GO 103 contained in Attachment 1 of this WG Report are the result of an extensive WG evaluation process that took place from March through June 2008. This GO 103 evaluation process involved the participation of subject matter experts and representatives from Class A and B water utilities, DRA, and TURN. The WGs' recommended changes are the result of extensive discussions and compromises reached through the WG process. The recommended changes are aligned with the Commission's outlined objectives in R.07-12-015. DWA staff therefore recommends adoption of the WGs' GO 103 proposed changes and recommendations contained in this report.

**(END OF APPENDIX A)**