



February 18, 2020

Mr. Robert Hunter
General Manager
Municipal Water District of Orange County
18700 Ward Street
Fountain Valley, CA 92708

Re: Proposed Orange County Residential End Uses of Water Study

Rob:

On February 19, 2020, the Municipal Water District of Orange County (MWDOC) Board of Directors will consider the implementation of several water use efficiency research activities. These activities include the implementation of a Residential End Uses of Water Study (End Uses Study). As a leader in the industry, IRWD recognizes the importance of understanding residential water use and we appreciate MWDOC's interest in wanting to understand use in Orange County. IRWD has reviewed the proposed End Uses Study and identified some significant concerns. The purpose of this letter is to express those concerns and to recommend a different approach for the study.

Many retail agencies will likely have concerns with the proposed End Uses Study and will choose to not participate. However, some retail agencies may want MWDOC to assist them in a localized End Uses Study of their service areas. Accordingly, IRWD recommends that MWDOC replace the concept of a "Core" funded Orange County Residential End Uses of Water Study with a "Choice" funded program where MWDOC could provide assistance to retail agencies that request MWDOC's help in performing localized End Uses Studies.

Concerns with End Uses Study:

IRWD has the following concerns with the End Uses Study proposed by MWDOC:

1. The study and evaluation of customer water use as well as demand forecasting is the purview and responsibility of individual retail agencies;
2. Retailers typically have specific knowledge, assumptions and methodologies that are used when calculating their projected demands. This local experience should be the basis for any forecasts used by MWDOC and Metropolitan Water District of Southern California (Metropolitan);
3. Any residential uses and demand forecasts that MWDOC might derive from its study could conflict with retail agencies' understanding of their unique service areas and customer water use;

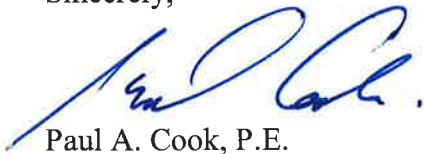
Mr. Robert Hunter
General Manager
Municipal Water District of Orange County
February 18, 2020
Page 2

4. Differences in residential uses and demand forecasts between the retail agencies and MWDOC will introduce uncertainty about the accuracy of the forecasts;
5. The MWDOC study will result in comparisons being made among the retail agencies that could complicate the stakeholder input process for the recent water use efficiency legislation;
6. IRWD has experienced problems with the “Flume” type water sensors that MWDOC is proposing to use in its study. The use of such devices can cause meter problems and challenges in planning meter replacements, and can result in customer billing complaints;
7. IRWD’s Rules and Regulations do not permit the installation of the “Flume” type water sensors on IRWD meters; and
8. Per capita residential water use varies dramatically across Orange County. The sampling of end uses for only a subset of Orange County retail agencies will not be useable in forecasting future demands across the county.

As a result of these concerns, IRWD should not be expected to participate in the study. It is likely that other retail agencies will have similar concerns and choose not to participate. However, some retail agencies may want MWDOC to assist them in a localized End Uses Study of their service areas. To assist such agencies, IRWD recommends that MWDOC replace the concept of a “Core” funded Orange County Residential End Uses of Water Study with a “Choice” funded program where MWDOC could provide direct assistance to the interested retail agencies.

We appreciate the opportunity to share our concerns with the proposed End Uses Study. Please provide a copy of this letter to the MWDOC Board of Directors. If you have any questions or would like to discuss our concerns, please contact me at (949) 453-5590.

Sincerely,



Paul A. Cook, P.E.
General Manager

cc: MWDOC Board of Directors