

Retail and Wholesale Requirements for Water Conservation & Drought Contingency Plans



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Retail Public Water Supplier



An individual or entity that for compensation supplies water to the public for human consumption

Wholesale Public Water Supplier



An individual or entity that for compensation supplies water to another for resale to the public for human consumption

Water Conservation Plan



A strategy or combination of strategies for reducing the volume of water withdrawn from a water supply source, for reducing the loss or waste of water, for maintaining or improving the efficiency in the use of water, for increasing the recycling and reuse of water, and for preventing the pollution of water

Drought Contingency Plan



A strategy or combination of strategies for temporary supply and demand management responses to temporary and potentially recurring water supply shortages and other water supply emergencies

30 TAC Chapter 288



Retail Public Water Suppliers
Water Conservation – §288.2
Drought Contingency – §288.20

Wholesale Public Water Suppliers
Water Conservation – §288.5
Drought Contingency – §288.22



WATER CONSERVATION PLANS



Required Submittals

- ★ Every 5 years for
 - ◆ Non-irrigation (municipal and industrial) water rights holders of 1,000 acre-feet or more and
 - ◆ Irrigation water rights holders of 10,000 acre-feet or more
- ★ Implementation reports are required to be submitted with required WCPs



Water Conservation Plan Elements



System Inventory

- ★ population and customer data
- ★ water use data
- ★ water supply system data
- ★ wastewater system data



Specific, quantified five-year and ten-year targets

Retail

- goals for water loss programs
- goals for municipal use (gpcd)

Wholesale

- target goals for municipal use (gpcd)
- maximum acceptable unaccounted-for water
- the basis for the development of these goals



Diversions from the Source

Retail

metering device(s), within an accuracy of plus or minus 5.0%

Wholesale

description as to which practice(s) and/or device(s) will be utilized

Deliveries of Water



Retail

- program for universal metering of both customer and public uses of water, for meter testing and repair, and for periodic meter replacement
- measures to determine and control unaccounted-for uses of water

Deliveries of Water cont.



Wholesale

- a monitoring and record management program for determining water deliveries, sales, and losses
- a program of metering and leak detection and repair for the wholesaler's water storage, delivery, and distribution system

Additional Retail Requirements



- ★ a program of continuing public education and information regarding water conservation
- ★ a water rate structure which is not "promotional"

Additional Wholesale Requirement



- ★ a requirement in every water supply contract entered into or renewed after official adoption of the water conservation plan, and including any contract extension, that each successive wholesale customer develop and implement a water conservation plan or water conservation measures using the applicable elements of this chapter

Means for implementation and enforcement



- ★ Ordinance
- ★ Resolution
- ★ Tariff

Best Management Practices



- ★ A BMP is structured for delivering a conservation measure or series of measures that is:
 - ◆ Useful
 - ◆ Proven
 - ◆ Cost effective
 - ◆ Generally accepted

BMP Guide



- ★ The result of the work by the Texas Water Conservation Task Force
- ★ Texas Water Development Board Report 362
- ★ Link:
<http://www.twdb.state.tx.us/assistance/conservation/TaskForceDocs/WCITFBMPGuide.pdf>

Best Management Practices



- ★ Each BMP structure has several elements that:
 - ◆ Describe the efficiency measures
 - ◆ Implementation techniques
 - ◆ Schedule of implementation
 - ◆ Scope
 - ◆ Costs considerations
 - ◆ References to assist end users

BMP Examples



- ★ System Water Audit and Water Loss
- ★ Water Conservation Pricing
- ★ Prohibition on Wasting Water
- ★ Residential Toilet Replacement Programs
- ★ School Education
- ★ Public Information

DROUGHT CONTINGENCY PLANS



Required Submittals



- ★ Review every 5 years
- ★ Update as necessary
- ★ Required for ALL Retail & Wholesale providers
- ★ Submit to TCEQ every 5 years if entity
 - ◆ provides Wholesale Service
 - ◆ has >3,300 retail connections

Drought Contingency Plan Elements



Public/User Input



Preparation of the plan shall include provisions to actively inform the public and affirmatively provide opportunity for public/user input

Ongoing Education



Retail

Provisions shall be made for a program of continuing public education and information regarding the drought contingency plan

Wholesale

Provisions for informing wholesale customers about the plan

Initiation/Termination of Drought Response Stages



Retail

procedures for notification of the public

Wholesale

procedures for notification of wholesale customers

Triggers



The drought contingency plan must include:

- a description of the information to be monitored by the water supplier
- specific criteria for the initiation and termination of drought response stages
- an explanation of the rationale or basis for such triggering criteria

Retail Triggers



- ★ reduction in available water supply up to a repeat of the drought of record
- ★ water production or distribution system limitations
- ★ supply source contamination
- ★ system outage due to the failure or damage of major water system components

Wholesale Triggers



A minimum of three drought or emergency response stages providing for the implementation of measures in response to water supply conditions during a repeat of the drought-of-record

Specific, Quantified Targets



The drought contingency plan must include specific, quantified targets for water use reductions to be achieved during periods of water shortage and drought

Supply/Demand Management



- ★ Retail
 - curtailment of non-essential water uses
 - utilization of alternative water sources and/or alternative delivery mechanisms
- ★ Wholesale
 - pro rata curtailment of water deliveries to or diversions by wholesale water customers as provided in Texas Water Code, §11.039
 - utilization of alternative water sources

Variances



The drought contingency plan must include procedures for granting variances to the plan

Wholesale Contracts



The drought contingency plan must include a provision in every wholesale water contract entered into or renewed after adoption of the plan, including contract extensions, that in case of a shortage of water resulting from drought, the water to be distributed shall be divided in accordance with Texas Water Code, §11.039

Means for implementation and enforcement



- ★ Ordinance
- ★ Resolution
- ★ Tariff

COORDINATION WITH REGIONAL WATER PLANNING GROUPS



Conclusions



The rule requirements are similar for retail and wholesale providers

'however'

The approach to planning is very different between retail and wholesale providers

Conclusions



Incorporating BMPs into Water Conservation Plans can:

- ♦ Maximize the effectiveness of the plans
- ♦ Allow for more accurate measurement and reporting of implementation progress

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