



## IRVINE RANCH WATER DISTRICT

15600 Sand Canyon Avenue • P.O. Box 57000 • Irvine, California 92619-7000 • (949) 453-5300 • [www.inwd.com](http://www.inwd.com)

April 13, 2015

Jessica Bean  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

### **RE: Comments on SWRCB Mandatory Conservation Proposed Regulatory Framework**

Dear Ms. Bean:

Thank you for the opportunity to provide comments for the State Water Resources Control Board's (SWRCB) consideration as it develops a framework for achieving the 25 percent reduction in potable urban water use mandated by Executive Order B-29-15. The Irvine Ranch Water District (IRWD) understands the importance of achieving a 25 percent reduction in potable urban water use at this time as California enters the fourth year of a severe drought.

As we have discussed on several occasions with the SWRCB, IRWD has taken many steps over many years to encourage water use efficiency and the wise use of water within its service area including the implementation of innovative conservation measures and recycled water development. Our past efforts have allowed us to achieve dramatic reductions in water usage; however, they have also resulted in significant demand hardening, which makes achieving substantial new reductions in water savings during the current drought more challenging. Despite this challenge, the District remains committed to continuing to seek greater water efficiency and conservation within our service area during this drought and well into the future.

IRWD has reviewed the "Mandatory Conservation Proposed Regulatory Framework" released by the SWRCB on April 7, 2015. We recognize and appreciate the SWRCB's challenge in developing an easy to understand apportionment of the 25 percent water use reduction allocating a proportionally higher reduction to those areas with higher per capita use. The draft regulatory framework sets a simple outline for the implementation of a 25 percent reduction in potable urban water use. Unfortunately, the simple nature of this framework has not resulted in an apportionment scheme that balances recognition for supply development through reuse, the prior adoption of water conservation practices and the resultant demand hardening, and the goal of ensuring efficient water use by Californians.

**The District asks the SWRCB to consider the following changes to the framework, all of which are discussed in more detail below:**

- 1) Treat water produced from Indirect Potable Reuse (IPR) projects the same as recycled water production, which is not reported in the amount of potable water produced by agencies;**
- 2) Provide agencies with a 2.5% reduction credit off of their required potable water reduction target for each 10 percent of total water demand met by recycled water;**
- 3) Use total service population GPCD data to apportion water supplier reductions;**
- 4) Increase the number of apportionment tiers contained within the framework;**

- 5) **Use an average GPCD and incorporate a climate adjustment factor based on Evapotranspiration Zones allowing for the establishment and maintenance of drought tolerant landscaping to determine apportionment tiers;**
- 6) **Reexamine the “June 2014 –February 2015 Urban Water Supplier Report” for data quality before an apportionment is based on the data; and**
- 7) **Allow suppliers to exclude extraordinary supplies from potable water supply production.**

To assist the SWRCB in understanding the statewide impacts of these proposed changes to the framework, and what a framework with the changes could look like, several agencies are working on refining the SWRCB proposed framework worksheet. This refined spreadsheet will be provided to the SWRCB for its consideration by April 21, 2015.

Detailed Comments:

IRWD offers the following detailed comments for the SWRCB’s consideration as it considers refinements to its proposed framework.

- 1) ***Water produced from indirect potable reuse projects should be treated as reused water, and not be counted as potable water production. The SWRCB should treat water produced from IPR projects in the same manner it treats recycled water production, and should not consider water production from IPR projects in the amount of potable water produced by agencies.***

Implicit in the concept of reliability is the responsibility of water suppliers to develop an array of strategies to meet existing and future water needs. IRWD, like others throughout the state, has actively developed and made substantial investments in alternative local supplies, recycled water, IPR and water use efficiency in order to prepare for times of drought and limited imported water supplies. These efforts have not only allowed our agency to become more self-reliant, but have also aided the entire state by lessening the demand for imported water.

During times of drought, the benefits of increased self-reliance continue to accrue to the state. A lower demand on the state’s water supplies is a benefit for the entire state as it means those impaired supplies can go further. This benefit has been recognized by the SWRCB for recycled water in the current emergency drought regulations; however, the benefits of similar reuse projects have not been recognized in the proposed framework. The SWRCB should treat all recycled water and reuse projects equally, and its framework should reflect this understanding of water from IPR projects, which if not implemented would result in water discharges and the water not being put to beneficial reuse.

An example of such IPR projects is Orange County’s engagement in advanced water recycling and IPR through the Groundwater Replenishment System (GWRS). GWRS has expanded the use of indirect potable supplies within the county and throughout the state, and has helped establish the important role IPR can play towards building a reliable water supply for all of California. Like recycled water, Orange County invested in this supply because it takes wastewater flows, which are a more “drought-proof” water supply, and reuses the water as a source of supply.

IRWD asks the SWRCB to clarify that water production from IPR projects be treated the same as recycled water, and that urban water suppliers are not required to report IPR production as part of their potable water supply production. Furthermore, IRWD asked the SWRCB to enact this change retroactively and allow agencies to correct their reported numbers for 2013 and each reporting period since June 2014 to better reflect potable water production from non-reuse projects, which are impacted by the drought. To limit the exclusion of IPR projects to those projects which are truly indirect potable reuse projects, the SWRCB may want to consider using the definition of IPR contained with SBx7-7.

- 2) ***The SWRCB should provide a recycled water adjustment credit within the framework to agencies with large percentages of their total water supply comprised of recycled water to account for demand hardening as a result of those efforts.***

The Governor's Executive Order makes clear that the State should try to mitigate the impact of the mandatory water restrictions on California's economy. This is why the Executive Order did not place a mandatory 25 percent reduction on agricultural water usage. Since the issuance of Executive Order B-29-15, the Governor has reemphasized the need to try to reduce the potential negative impact the drought may have on California's economy. California's urban centers comprise the majority of California's economy and the SWRCB framework, as proposed, would have a substantial impact on the urban Commercial, Industrial and Institutional (CII) sector unless the framework is altered to focus on CII outdoor potable water use.

Executive Order B-29-15 directs the SWRCB to focus CII potable water reductions on outdoor water use in order to mitigate the impact a 25 percent reduction in potable urban water use will have on California's economy.<sup>1</sup> In areas of the state where CII outdoor demands are still served by potable water, CII outdoor potable demands represent a discretionary potable use that can and should be targeted for reduction. However, a number of agencies have already targeted CII outdoor potable use through extensive recycled water programs. For these agencies, outdoor potable CII demand has hardened, and has approached or is approaching zero.

Under the current framework, this demand hardening is not recognized. **Unless the framework is modified to credit these previous reductions in CII outdoor potable water use, the framework risks causing negative economic impacts in those service areas where CII outdoor potable demands have been addressed through recycled water programs.**

For example, in the case of IRWD, IRWD's total potable CII use in 2014 was 22,764 acre-feet. IRWD's CII outdoor use in 2014 was 24,597 acre-feet, and was served with recycled water. In areas served by potable water, this 24,597 acre-feet demand would be discretionary potable use that could be targeted for reduction. This is not the case for IRWD because the outdoor potable demand has already been reduced substantially and is approaching zero. Consequently, IRWD would need to cut indoor CII use, creating a negative economic impact, or reduce residential use to health and human safety levels of 25 GPCD with the resulting loss of all landscaping including drought tolerant landscapes, in order to comply with the 20 percent reduction allocated to it under the draft framework.

IRWD proposes that the SWRCB provide an agency with a 2.5% reduction credit off of their required potable water reduction target for each 10 percent of its total water demand met by recycled water. This avoids penalizing agencies who have invested in recycled water.

Similar to the proposed recycled water adjustment, significant pre-2013 conservation achievements should be considered and recognized in the proposed framework. The SWRCB should incorporate demand hardening in its apportionment of the water suppliers reductions.

- 3) ***The SWRCB should use gallons per capita daily (GPCD) data that better reflects water use within an urban water supplier's service area, and should use total service population GPCD data to apportion water supplier reductions. The SWRCB should allow each urban water supplier to state the average population it serves daily for each reporting period in addition to the residential population.***

The SWRCB has used an estimate of the residential gallons per capita used daily within the supplier's service area to determine the amount of potable water savings required of each urban water supplier. In some areas of the state,

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<sup>1</sup> Directive 5 of the Executive Order states "The Water Board shall impose restrictions to require that commercial, industrial, and institutional properties, such as campuses, golf courses, and cemeteries, immediately implement water efficiency measures to reduce potable water usage in an amount consistent with the reduction targets mandated by Directive 2 of this Executive Order."

categorization based on this number skews the required savings because it does not take into account job centers, which have dramatic daytime population increases and a resulting increase in potable water demands. We ask the SWRCB to consider allowing each urban water supplier to state the average population it serves daily each month in addition to the residential population, as the daytime and residential population numbers can vary greatly. For example, IRWD's daytime population is approximately 500,000 while its resident population is nearly 380,000.

Use of a GPCD based on the average population served would result in a better apportionment of water supplier reductions because it would account for water demands within job centers. Additionally, such an apportionment would better reflect the intent of Executive Order B-29-15, Directive 2, which calls for proportionately higher demand reductions in those areas with higher per capita water use, and not simply those areas with a higher residential GPCD (R-GPCD). IRWD asks the SWRCB to consider amending its framework to allocate water supplier reductions based on a total population served GPCD calculation instead of on R-GPCD, which focused purely on residential use.

4) ***The SWRCB should increase the number of apportionment tiers contained within the framework to more equitably align the proposed conservation standard to historic conservation efforts.***

As currently proposed, the framework provides for just four apportionment tiers. The current breakpoint between Tier 1, a 10 percent required reduction, and Tier 2, a 20 percent required reduction, is a .004 percent difference in R-GPCD. This means that if an urban water supplier's R-GPCD is less than one percent higher, it must obtain a 10 percent higher reduction in its potable water use than an agency similarly situated. Similarly, the breakpoint between Tier 2 and Tier 3, a 25 percent required reduction, is a .014 percent difference in R-GPCD, and the breakpoint between Tier 3 and Tier 4, a 35 percent required reduction, is a .005 percent difference in R-GPCD. These breakpoints mean that agencies with similar R-GPCD face substantially different reduction targets.

IRWD suggests that more tiers be added so that agencies with similar GPCD's be treated more uniformly. As demonstrated in the attached apportionment worksheet, a 25 percent statewide reduction can be obtained while allowing for a greater number of tiers. As mentioned above, IRWD is working with a number of other agencies to develop a framework for the SWRCB's consideration, which will incorporate a greater number of tiers and a more equitable treatment of similarly situated agencies, while still obtaining a 25 percent statewide reduction. We will be providing that model to the SWRCB by April 21, 2015.

5) ***The SWRCB should provide agencies with sufficient water allocations to establish and sustain drought tolerant landscaping. The framework should use DWR's CIMIS Reference Evapotranspiration Zones in determining an urban water supplier's apportionment tier.***

Additionally, IRWD asks that the SWRCB not require agencies to reduce R-GPCD below a level that allows for reasonable indoor water use and that sustains drought tolerant landscapes.

Directive 3 of the Executive Order sets a 50 million square-foot goal for replacing lawns and ornamental turf with drought tolerant landscapes. IRWD supports this effort and has been actively encouraging its customers to install drought tolerant landscapes through its RightScape Program and turf replacement rebates. The RightScape Program encourages customers to transform their landscapes into California appropriate drought-resistant landscapes using the right plants, watering schedules, and equipment. IRWD's turf replacement rebate program incentivizes these landscape transformations by offering a turf replacement incentive of \$2.00 a square-foot. In order to qualify for the rebate, customers must install drought-resistant landscapes and replace spray and overhead irrigation systems with drip systems. To date these efforts have resulted in the completed and planned removal of 3.1 million square-feet of turf. Many of these conversions are recent and have been encouraged by the drought.

New conversions have an establishment period of 4 to 6 weeks, and require a higher level of water during that time period than during their maintenance period. If California seeks to encourage its residents to change turf to drought tolerant landscapes, the SWRCB should recognize the water needs of these landscapes in its framework. Requiring

reductions in R-GPCD levels at and below a level that allows for reasonable indoor water use, and water establishment and maintenance needs for drought tolerant landscapes with an appropriate weather zone adjustment runs counter to State and local agency efforts to convert California's landscapes to drought tolerant landscapes.

Towards this end, the SWRCB framework should (i) use an average GPCD to determine apportionment tiers and (ii) allow for the impact of climate in the determination of apportionment tiers allowing sufficient water to establish and sustain drought tolerant landscapes.

Due to the high variability in month-to-month water demand across the state, it is recommended that a 10-month average GPCD (June 2014-March 2015) be used for determining which conservation tier an agency is placed. Additionally, the use of an average GPCD will provide a more accurate picture of a supplier's water use.

The SWRCB apportionment framework should also include the impact of climate in the determination of the conservation tiers. IRWD recommends that the framework incorporate, at a minimum, the effects of evapotranspiration (ET<sub>o</sub>) as published by the Department of Water Resources (DWR) in the CIMIS Reference Evapotranspiration Zones map ([http://www.cimis.water.ca.gov/App\\_Themes/images/etozonemap.jpg](http://www.cimis.water.ca.gov/App_Themes/images/etozonemap.jpg)). Use of DWR's regional ET<sub>o</sub> data in determining an agency's apportionment tier will ensure that efficient landscape water use is considered in the tier development and that the State's other drought-response goals related to California appropriate landscapes are obtained.

**6) *The "June 2014–February 2015 Urban Water Supplier Report" should be reexamined for data quality before an apportionment is based on the data.***

IRWD asks that the SWRCB examine the "June 2014- February 2015 Urban Water Supplier Report," which provides the basis for the apportionment of water supplier reductions, to ensure that the report contains quality data. The report indicates that some agencies reported R-GPCD so low that they indicated that the urban water supplier has zero or negative commercial use within its service area. This is improbable given the land use composition of California's urban areas and suggests that the underlying data contains flaws. The data should go through a quality control review before allocations are assigned. If apportionment is based on the current data set without a quality control review, the SWRCB risks making an inequitable apportionment of the required reductions.

**7) *Extraordinary supplies should not be counted towards an urban water supplier's potable water supply production.***

A few agencies in the state have taken remarkable steps to create extraordinary supplies of water that are not drawn upon except in severe shortage situations. These supplies have been developed to increase an urban water supplier's water supply reliability, and are in addition to the normal or regional supplies that the agency draws upon. For example, IRWD has engaged in water banking during wet years so that it can have an emergency supply of water, which is only to be drawn upon in a time of severe shortage. This type of forethought should be encouraged by the SWRCB and an agency should not face punitive consequences for drawing upon those planned extraordinary supplies. Urban water agencies should be permitted to draw upon these supplies during this time of drought to meet their potable water supply demands. Those agencies, which have such supplies, should not be required to count these supplies towards the potable water production considered for compliance with the framework.

**Conclusion:**

We agree with the SWRCB that the management of any limited resource includes the practice of conservation, and understand the impacts the drought is having on the state. We have implemented aggressive water conservation programs with the core feature of pricing that rewards customers for conserving, and continue to promote conservation as a way of life. These programs result in water being conserved both locally and statewide through reductions in dependence on imported water. These benefits are realized in both wet and dry times.

April 13, 2015

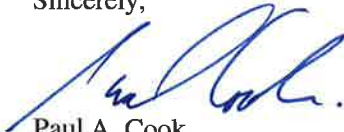
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Water resource stewardship has been a hallmark of many agencies, and it is not an understatement to say that conservation is a way of life within our service area. It is our hope that the proposed 25 percent reduction will be developed and implemented in a manner that will not only provide short-term drought relief, but designed to result in permanent water use reductions for the state.

Towards this end, the framework should recognize and support these on-going local conservation efforts and preserve the beneficial use of water reuse by giving local suppliers more flexibility and clarification in the framework. Specifically, we ask that the SWRCB continue allowing agencies to use their allocation-based tiered rate structures to gain the required potable water savings. Due to legal requirements, agencies using allocation-based tiered rate structures will need time, up to three months, to adjust their allocation tiers and rates to gain the required savings. The framework's compliance reporting requirements should recognize this need.

Thank you again for considering our comments on the proposed emergency regulations. Please do not hesitate to contact me at (949) 453-5590, or our Sacramento Advocate, Maureen O'Haren, at (916) 498-1900 if we can be of assistance to you or your staff.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul A. Cook".

Paul A. Cook  
General Manager

Enclosure:

Supplier Name	2013 Total Water Production (June-Feb)	2014/15 Total Water Production (June 14-Feb 15)	Total Water Saved (June-14 - Feb-15, compared to 2013, gallons)	Percent Saved (June-14 - Feb-15, compared to 2013, gallons)	Tier	Conservation standard	Sept-2014 R-GPCD	Proposed Required Savings
Cambria Community Services District	166,216,813	95,513,570	70,703,243	43%	1	10%	40.0	16,621,681
Vernon City of	1,907,061,769	1,788,380,162	118,681,607	6%	1	10%	43.7	190,706,177
Santa Cruz City of	2,527,700,000	1,933,400,000	594,300,000	24%	1	10%	44.9	252,770,000
Seal Beach City of	905,215,264	856,337,550	48,877,714	5%	1	10%	45.3	90,521,526
San Francisco Public Utilities Commission	20,365,410,000	18,171,900,000	2,193,510,000	8%	1	10%	45.7	2,036,541,000
California Water Service Company South San Francisco	2,075,673,590	1,907,534,254	168,139,336	8%	1	10%	46.1	207,567,359
California Water Service Company East Los Angeles	3,998,522,861	3,819,955,279	178,567,582	4%	1	10%	48.2	399,852,286
Coastside County Water District	565,550,000	524,430,000	41,120,000	7%	1	10%	48.2	56,555,000
California-American Water Company Monterey District	2,903,844,543	2,590,336,368	313,508,175	11%	1	10%	49.3	290,384,454
California-American Water Company San Diego District	2,795,094,888	2,578,195,144	216,899,744	8%	1	10%	49.4	279,509,489
East Palo Alto, City of	409,886,088	454,911,335	-45,025,247	-11%	1	10%	49.7	40,988,609
Golden State Water Company Bell-Bell Gardens	1,279,423,043	1,208,354,847	71,068,196	6%	1	10%	50.0	127,942,304
Arcata City of	499,104,000	495,047,000	4,057,000	1%	1	10%	50.2	49,910,400
North Coast County Water District	809,332,364	713,333,361	95,999,003	12%	1	10%	51.2	80,933,236
Hayward City of	4,474,967,937	3,957,222,483	517,745,455	12%	1	10%	52.2	447,496,794
Grover Beach, City of	352,828,657	208,202,769	144,625,887	41%	1	10%	52.7	35,282,867
Westborough Water District	257,568,499	213,776,790	43,791,709	17%	1	10%	54.2	25,756,850
Daly City, City of	1,888,066,301	1,622,632,784	265,433,517	14%	1	10.00%	55.6	188,806,630
Park Water Company	2,833,164,110	2,598,821,539	234,342,571	8%	2	15.00%	55.8	424,974,617
San Bruno City of	929,865,974	849,620,197	80,245,777	9%	2	15.00%	58.3	139,479,896
Port Huemene, City of	500,546,894	456,100,759	44,446,135	9%	2	15.00%	59.9	75,082,034
Soquel Creek Water District	1,046,626,000	826,889,000	219,737,000	21%	2	15.00%	60.3	156,993,900
Paramount City of	1,628,999,712	1,623,382,034	5,617,679	0%	2	15.00%	61.2	244,349,957
Golden State Water Company Bay Point	512,238,443	452,672,802	59,565,641	12%	2	15.00%	61.9	76,835,766
Armadillo Water Agency	899,761,000	773,623,400	126,137,600	14%	2	15.00%	61.9	134,964,150
Golden State Water Company Florence-Graham	1,246,571,219	1,227,482,326	19,088,894	2%	2	15.00%	62.1	186,986,583
Compton City of	1,858,855,919	1,837,323,747	21,532,172	1%	2	15.00%	65.0	278,834,388
South Gate City of	2,066,696,383	2,017,629,675	49,066,708	2%	2	15.00%	66.5	310,004,457
Golden State Water Company Southwest	7,303,405,789	6,894,299,322	409,106,467	6%	2	15.00%	66.7	1,095,510,868
Estero Municipal Improvement District	1,137,677,797	1,077,438,670	60,239,127	5%	2	15.00%	67.2	170,651,670
California Water Service Company King City	428,820,478	403,729,918	25,090,560	6%	2	15.00%	67.2	158,736,100
Menlo Park City of	1,058,240,665	769,095,397	289,145,268	27%	2	15.00%	67.7	175,764,260
Huntington Park City of	1,171,761,731	1,128,423,492	43,338,240	4%	2	15.00%	67.8	99,730,088
Golden State Water Company S San Gabriel	684,867,252	637,528,317	27,338,935	4%	2	15.00%	68.1	86,139,656
Oxnard City of	5,742,131,037	5,086,123,686	656,007,351	11%	2	15.00%	68.1	378,877,016
Redwood City, City of	2,525,846,774	2,179,170,327	346,676,447	14%	2	15.00%	68.4	47,525,438
Monro Bay City of	316,836,255	281,236,756	35,599,499	11%	2	15.00%	69.5	368,694,697
Inglewood City of	2,457,964,645	2,284,776,001	173,188,643	7%	2	15.00%	70.0	187,980,000
Golza Water District	3,523,451,480	3,053,227,871	470,203,609	13%	2	15.00%	70.5	91,578,000
Lompoc City of	1,253,200,000	1,106,800,000	146,400,000	12%	2	15.00%	70.5	159,513,886
City of Big Bear Lake, Dept. of Water & Power	610,520,000	590,469,860	20,050,140	3%	2	15.00%	70.5	31,281,737
Sweetwater Springs Water District	208,544,913	177,491,272	31,053,641	15%	2	15.00%	71.4	210,370,804
Golden State Water Company Arnesia	1,402,138,690	1,348,796,812	53,341,879	4%	2	15.00%	71.7	51,667,200
McKinleyville Community Service District	344,448,000	300,869,000	43,579,000	13%	2	15.00%	72.1	1,830,061,734
Invine Ranch Water District	12,200,411,557	11,259,526,172	940,885,385	8%	2	15.00%	72.1	182,147,689
Golden State Water Company Norwalk	1,214,317,928	1,131,519,080	82,798,848	7%	2	15.00%	73.2	62,542,887
San Lorenzo Valley Water District	416,952,583	335,050,267	81,902,316	20%	2	15.00%	73.8	445,178,220
Mountain View City of	2,967,854,797	2,591,213,885	436,640,912	15%	2	15.00%	74.0	777,824,301
Sweetwater Authority	5,185,495,337	4,886,767,783	298,727,554	6%	2	15.00%	74.1	1,462,127,938
San Gabriel Valley Water Company	9,747,519,587	9,124,165,807	623,353,780	6%	2	15.00%	74.4	1,595,135,279
Marina Coast Water District	1,063,425,908	946,906,368	117,029,540	11%	2	15.00%	74.8	159,513,886
Santa Ana City of	9,729,076,397	9,323,684,636	405,391,760	4%	2	20%	77.1	922,485,390
Sunnvale City of	4,612,426,949	3,920,970,221	691,456,728	15%	2	20%	77.3	882,061,600
Vallejo City of	4,410,308,000	4,020,375,000	389,933,000	9%	2	20%	77.5	555,883,400
Dublin San Ramon Services District	2,779,417,000	1,959,505,000	819,912,000	29%	2	20%	77.5	1,688,953,116
California Water Service Company Dominguez	8,444,765,582	8,077,205,172	367,560,410	4%	2	20%	78.3	171,881,414
Montebello Land and Water Company	859,407,071	791,398,619	68,008,451	8%	2	20%	78.5	406,625,564
Valley County Water District	2,053,127,821	1,853,913,772	179,214,049	9%	2	20%	78.8	

Santa Barbara City of	3,348,530,727	2,632,951,217	715,579,509	21%	2	20%	78.9	669,706,145
American Canyon, City of	915,968,361	777,155,653	138,812,708	15%	2	20%	79.1	183,193,672
Santa Clara City of	5,338,900,000	4,749,500,000	589,400,000	11%	2	20%	79.4	1,067,780,000
Alameda County Water District	10,539,100,000	8,458,900,000	2,080,200,000	20%	2	20%	80.2	2,107,820,000
Crestline Village Water District	185,010,871	167,499,027	17,511,844	9%	2	20%	80.3	37,002,174
Monterey Park City of	649,960,000	594,880,000	55,080,000	8%	2	20%	80.4	129,992,000
California Water Service Company Redwood Valley	108,182,674	82,440,411	25,742,263	24%	2	20%	80.6	21,636,533
Scotts Valley Water District	311,979,632	253,857,835	58,121,797	19%	2	20%	81.0	62,395,926
Greenfield, City of	573,049,890	501,684,126	71,365,764	12%	2	20%	81.2	114,609,978
California Water Service Company Mid Peninsula	3,986,792,209	3,551,780,554	435,011,655	11%	2	20%	81.5	797,358,442
San Diego City of	47,355,303,598	46,452,597,930	902,706,208	2%	2	20%	81.8	9,471,060,720
Long Beach City of	14,658,100,592	13,842,168,619	815,931,973	6%	2	20%	82.4	2,931,620,118
California Water Service Company Salinas District	4,612,101,098	4,065,974,106	546,126,992	12%	2	20%	82.9	922,420,220
Pomona City of	5,817,361,333	5,468,536,077	348,825,256	6%	2	20%	83.5	1,163,472,267
Golden State Water Company Culver City	1,267,000,000	1,124,000,000	143,000,000	11%	2	20%	83.6	253,400,000
East Bay Municipal Utilities District	52,390,500,000	46,127,500,000	6,263,000,000	12%	2	20%	83.8	10,478,100,000
Lynwood City of	1,264,349,156	1,237,371,916	26,977,240	2%	2	20%	84.4	252,869,831
Hi-Desert Water District	744,117,577	733,074,472	11,043,105	1%	2	20%	85.2	283,164,890
Golden State Water Company Culver City	1,415,824,450	1,344,756,254	71,068,196	5%	2	20%	85.2	214,149,558
Hawthorne City of	1,070,747,789	1,135,592,223	-64,844,434	-6%	2	20%	85.6	1,090,893,375
Santa Rosa City of	5,454,466,874	4,447,473,373	1,006,993,501	18%	2	20%	86.8	192,627,397
Windsor, Town of	963,136,985	817,896,531	145,240,453	15%	2	20%	86.8	133,777,122
Millbrae City of	668,885,610	603,267,242	65,618,369	10%	2	20%	87.6	153,777,122
Burlingame City of	1,288,363,748	1,075,113,151	213,250,598	17%	2	20%	87.8	257,672,750
Great Oaks Water Company Incorporated	2,641,791,567	2,210,783,322	431,008,244	16%	2	20%	88.0	528,358,313
California Water Service Company Oroville	830,595,287	682,007,037	148,588,251	18%	2	20%	88.1	166,119,057
Westminster City of	4,446,346,934	3,813,888,925	632,458,069	14%	2	20%	88.9	889,269,399
San Buenaventura City of	8,209,272,756	7,888,634,952	320,637,804	4%	2	20%	88.2	612,874,398
Otay Water District	2,438,968,604	2,305,516,153	133,452,452	4%	2	20%	89.9	1,641,854,551
Fountain Valley City of	1,526,056,730	1,408,567,739	117,488,991	8%	2	20%	90.6	487,793,721
Santa Fe Springs City of	6,808,665,567	6,318,910,872	489,754,695	7%	2	20%	90.7	305,211,346
California Water Service Company Stockton	4,000,477,969	3,830,090,298	170,387,711	4%	2	20%	91.9	800,095,594
Golden State Water Company West Orange	1,091,834,544	993,603,394	98,231,150	9%	2	20%	92.4	218,366,909
Adelanto city of	139,452,680,105	130,343,503,463	9,109,176,642	7%	2	20%	92.8	27,890,536,021
Los Angeles Department of Water and Power	583,110,000	710,650,000	-127,540,000	-22%	2	20%	92.8	116,622,000
Crescent City City of	832,612,930	742,476,980	90,135,950	11%	2	20%	92.9	166,522,586
Mesa Water District	4,434,609,825	4,283,056,327	151,553,499	3%	2	20%	92.9	886,921,965
California Water Service Company Hermosa/Redondo	2,984,799,071	2,983,495,666	1,303,406	0%	2	20%	93.4	596,959,814
Bellflower-Someraset Mutual Water Company	1,350,031,789	1,268,477,694	81,554,095	6%	2	20%	94.3	270,006,358
Rowland Water District	2,857,000,142	2,756,214,295	100,785,846	4%	2	20%	94.5	571,400,028
Crescenta Valley Water District	1,200,433,997	1,043,760,838	156,673,159	13%	2	20%	94.5	240,086,799
San Jose Water Company	36,046,000,000	31,608,900,000	4,437,700,000	12%	2	20%	94.6	7,209,200,000
Azusa City of	5,165,530,597	4,670,763,054	494,767,543	10%	2	20%	95.0	1,033,106,119
El Segundo City of	1,692,179,532	1,788,496,457	-96,316,925	-6%	2	20%	95.4	338,435,906
Mid-Peninsula Water District	823,925,361	712,822,442	111,102,919	13%	2	20%	96.3	164,785,072
Calixico City of	1,524,360,000	1,440,570,000	83,790,000	5%	2	20%	96.8	304,872,000
Watsonville City of	2,045,660,752	1,803,744,576	241,916,176	12%	2	20%	96.9	409,132,150
Torrance City of	3,906,665,343	3,703,464,394	203,200,950	5%	2	20%	97.3	781,333,069
Lomita City of	591,013,026	547,632,425	43,380,600	7%	2	20%	97.4	118,202,605
Golden State Water Company Barstow	1,595,531,512	1,445,509,515	150,021,997	9%	2	20%	98.3	319,106,302
Escondido City of	4,625,134,351	4,059,907,513	565,226,838	12%	2	20%	98.8	925,026,870
Marin Municipal Water District	7,006,662,670	5,966,662,221	1,040,000,448	15%	2	20%	99.8	1,401,332,534
San Gabriel County Water District	1,612,133,643	1,485,937,453	126,176,190	8%	2	20%	100.5	322,426,729
Pittsburg City of	2,481,549,000	2,226,323,000	255,226,000	10%	2	20%	100.7	496,309,800
Huntington Beach City of	7,506,541,568	7,116,888,432	389,653,136	5%	2	20%	100.9	1,501,308,314
Oceanside City of	6,988,111,948	6,765,555,423	222,556,525	3%	2	20%	100.9	1,397,622,390
Santa Monica City of	3,462,200,000	3,321,100,000	141,100,000	4%	2	20%	101.0	692,440,000
Nonwalk City of	559,456,000	511,830,000	47,626,000	9%	2	20%	101.0	111,891,200
Ukiah City of	678,601,000	551,722,000	126,879,000	19%	2	20%	101.0	135,720,000
Fairfield City of	5,435,000,000	4,853,000,000	582,000,000	11%	2	20%	101.1	1,087,000,000
Heila Water District	8,454,736,636	8,067,103,778	387,632,858	5%	2	20%	101.1	1,690,947,327



Camarillo City of	2,747,943,839	2,399,416,293	348,527,546	13%	2	20.00%	101.1	549,588,768
San Jose City of	5,294,000,000	4,707,000,000	587,000,000	11%	2	20.00%	101.1	1,058,800,000
Soledad City of	531,571,300	531,785,500	49,785,800	9%	2	20.00%	101.2	116,314,260
Golden State Water Company S Arcadia	908,701,874	851,189,098	57,512,777	6%	2	20.00%	101.4	181,740,375
California-American Water Company Sacramento District	8,801,191,649	7,285,565,423	1,515,626,225	17%	2	20.00%	101.4	1,760,238,330
Carpinteria Valley Water District	1,028,826,158	1,028,941,051	131,885,107	11%	2	20.00%	101.8	232,165,232
El Monte City of	328,279,000	312,936,000	15,343,000	5%	2	20.00%	101.9	65,655,800
Groveland Community Services District	127,297,692	96,625,396	30,672,236	24%	2	20.00%	102.0	25,459,526
Whittier City of	2,041,957,743	2,084,064,264	42,106,521	-2%	2	20.00%	102.3	408,391,549
Fontana City of	303,008,000	276,986,000	26,022,000	9%	2	20.00%	102.6	60,601,600
Glendale City of	6,839,188,070	6,346,086,881	493,101,189	7%	2	20.00%	103.2	515,029,687
Alhambra City of	2,575,148,433	2,329,573,763	245,574,669	10%	2	20.00%	103.3	229,858,000
Lathrop City of	1,149,290,000	990,960,000	158,330,000	14%	2	20.00%	104.9	3,267,507,769
Anaheim City of	16,337,538,847	15,992,788,037	344,750,810	2%	2	20.00%	105.1	979,313,879
Vista Irrigation District	4,896,569,394	4,632,303,886	264,265,507	5%	2	20.00%	105.3	465,733,200
California Water Service Company Kern River Valley	2,328,666,000	1,995,678,000	332,988,000	14%	2	20.00%	105.8	44,576,475
Humboldt Community Service District	610,120,000	222,882,376	201,376,182	10%	2	20.00%	106.6	122,024,000
Coachella City of	1,395,900,000	573,669,000	36,451,000	6%	2	20.00%	106.6	279,180,000
California Water Service Company Kern River Valley	1,294,010,000	1,018,900,000	101,890,000	7%	2	20.00%	107.3	636,088,170
Coachella City of	2,685,999,460	494,441,392	494,441,392	16%	2	20.00%	107.3	721,174,378
Palo Alto City of	3,180,440,852	3,247,435,321	58,436,570	10%	2	20.00%	107.6	117,837,854
Napa City of	589,289,272	550,757,340	38,531,931	7%	2	20.00%	107.8	87,561,818
Orchard Dale Water District	437,809,090	430,597,020	7,212,070	2%	2	20.00%	108.9	818,051,311
Perris City of	4,090,256,554	3,834,059,128	256,197,426	6%	2	20.00%	109.3	521,657,993
Downey City of	2,086,651,973	1,856,580,866	230,051,107	11%	3	25%	110.8	139,986,500
Lakewood City of	559,946,000	448,854,000	111,092,000	20%	3	25%	110.8	679,921,995
City of Newman Water Department	2,719,687,979	2,424,775,231	294,912,748	11%	3	25%	111.0	467,083,582
Milpitas City of	1,868,334,327	1,778,577,770	89,576,557	5%	3	25%	112.5	1,097,508,338
Golden State Water Company Placentia	4,390,033,350	4,037,168,840	352,864,510	8%	3	25%	112.9	944,480,361
Vallejos Water District	3,777,921,445	3,441,805,698	336,115,747	9%	3	25%	113.1	92,407,979
Buena Park City of	369,631,917	306,051,990	63,579,927	17%	3	25%	113.2	304,915,473
Del Oro Water Company	1,219,661,891	1,153,188,200	66,473,691	5%	3	25%	113.3	316,764,245
Manhattan Beach City of	1,642,615,000	1,099,162,034	167,894,948	13%	3	25%	113.3	410,653,750
Pico Rivera City of	3,172,199,486	3,139,252,648	32,946,838	1%	3	25%	113.4	793,049,872
Livermore City of Division of Water Resources	1,642,615,000	1,199,514,000	443,101,000	27%	3	25%	113.6	1,109,888,000
Beaumont-Cherry Valley Water District	4,439,552,000	6,833,016,444	327,105,955	5%	3	25%	114.6	695,366,945
Pleasanton City of	3,172,199,486	3,139,252,648	32,946,838	1%	3	25%	114.7	346,929,127
Suburban Water Systems San Jose Hills	7,160,122,399	6,833,016,444	327,105,955	5%	3	25%	114.9	266,141,597
California Water Service Company Livermore	2,781,467,781	1,909,163,511	872,304,270	31%	3	25%	115.3	582,785,277
Lakeside Water District	1,387,716,506	1,278,706,170	109,010,336	8%	3	25%	116.6	567,665,271
San Luis Obispo City of	1,064,566,388	977,942,044	86,624,343	8%	3	25%	116.6	143,781,942
El Toro Water District	2,331,141,109	2,239,576,858	91,564,251	4%	3	25%	117.4	263,196,281
San Clemente City of	2,270,663,084	2,331,434,375	-60,771,291	-3%	3	25%	118.4	1,954,306,153
California Water Service Company Marysville	575,127,769	496,597,575	78,550,194	14%	3	25%	118.4	209,929,282
Sunny Slope Water Company	1,052,785,122	950,022,234	102,762,888	10%	3	25%	118.2	135,037,500
Healdsburg City of	540,150,000	446,810,000	93,340,000	17%	3	25%	118.4	209,929,282
Valencia Water Company	7,817,224,611	6,780,899,767	1,036,324,844	13%	3	25%	118.4	215,218,500
San Fernando City of	839,719,127	786,931,196	52,787,931	6%	3	25%	118.4	289,238,500
Eureka City of	860,874,000	799,778,000	61,096,000	7%	3	25%	120.7	1,783,801,950
Alco Water Service	1,156,954,000	1,028,617,000	128,337,000	11%	3	25%	121.4	4,356,877,968
Moulton Niguel Water District	7,135,207,799	6,864,125,480	271,082,319	4%	3	25%	122.5	166,691,334
Riverside City of	17,427,511,870	15,956,944,380	1,470,567,490	8%	3	25%	123.0	614,250,000
TwentyNine Palms Water District	666,765,536	641,552,256	25,213,080	4%	3	25%	123.0	706,690,282
North Marin Water District	2,457,000,000	1,986,810,000	470,190,000	19%	3	25%	123.7	596,530,000
Brea City of	2,886,120,000	2,727,376,444	99,384,685	4%	3	25%	124.0	494,580,750
Delano City of	1,578,323,000	2,229,650,000	156,470,000	7%	3	25%	124.5	460,597,500
El Centro City of	1,842,390,000	1,910,544,000	67,779,000	3%	3	25%	125.0	601,942,500
Brawley City of	2,407,770,000	1,088,690,000	753,700,000	41%	3	25%	125.1	409,961,827
Petaluma City of	1,639,947,306	1,071,485,000	336,285,000	14%	3	25%	125.7	194,052,671
South Coast Water District	776,210,684	1,549,814,557	90,032,749	5%	3	25%	125.7	5,514,953,939
Arroyo Grande City of	22,059,815,756	654,635,517	121,575,167	16%	3	25%	125.7	360,310,216
Eastern Municipal Water District	22,059,815,756	21,154,600,492	905,215,264	4%	3	25%	126.2	
Tuolumne Utilities District	1,441,240,862	992,152,425	449,088,437	31%	3	25%		

La Palma City of	545,401,972	497,342,471	48,059,501	9%	3	25%	127.3	136,350,493
California Water Service Company Dixon, City of	382,549,575	346,705,918	35,843,657	9%	3	25%	127.4	95,637,394
Tracy City of	4,529,625,694	3,497,663,768	1,031,961,925	23%	3	25%	127.5	1,132,406,424
Lake Arrowhead Community Services District	440,648,885	386,238,213	54,410,671	12%	3	25%	127.7	110,162,221
Martinez City of	1,027,679,751	871,695,210	155,984,540	15%	3	25%	128.1	256,919,938
Reedley City of	1,302,000,000	1,109,000,000	193,000,000	15%	3	25%	128.8	325,000,000
Davis City of	3,023,400,000	2,527,400,000	496,000,000	16%	3	25%	129.0	755,850,000
California Water Service Company Willows	364,301,895	318,682,686	45,619,209	13%	3	25%	129.3	91,075,474
Sacramento City of	28,979,000,000	23,440,000,000	5,539,000,000	19%	3	25%	129.3	7,244,750,000
Burbank City of	4,712,137,486	4,362,205,638	349,931,847	7%	3	25%	130.1	1,178,034,372
Ventura County Waterworks District No. 8	5,424,122,854	4,896,895,245	527,227,609	10%	3	25%	130.2	1,356,030,714
Padre Dam Municipal Water District	2,952,148,758	2,752,858,026	199,290,733	7%	3	25%	130.6	738,037,190
Ontario City of	8,782,999,363	8,499,508,622	283,490,741	3%	3	25%	131.3	2,195,749,841
Pico Water District	1,029,001,320	960,057,631	68,943,690	7%	3	25%	131.5	257,250,330
Santa Maria City of	3,370,607,161	3,257,210,864	113,396,297	3%	3	25%	131.5	842,651,790
Valley of the Moon Water District	800,300,880	646,691,259	153,609,621	19%	3	25%	131.5	200,075,220
San Juan Capistrano City of	2,040,416,466	1,962,283,810	78,132,655	4%	3	25%	131.8	510,104,117
Laguna Beach County Water District	872,082,691	867,064,579	5,018,112	1%	3	25%	132.0	218,070,673
Santa Margarita Water District	7,105,190,366	6,932,489,109	172,701,256	2%	3	25%	132.3	1,776,297,592
Monte Vista Water District	2,603,464,922	2,359,464,115	244,000,807	9%	3	25%	133.3	650,866,231
Lincoln Avenue Water Company	613,030,807	557,668,649	55,362,157	9%	3	25%	133.8	153,257,702
San Gabriel Valley Fontana Water Company	10,907,224,816	10,188,722,419	718,502,397	7%	3	25%	134.3	2,726,806,204
Tehachapi City of	582,624,632	536,291,818	46,332,814	8%	3	25%	134.6	145,656,158
North Tahoe Public Utility District	350,120,000	332,141,000	17,979,000	5%	3	25%	134.7	87,530,000
Fresno City of	36,603,191,424	30,513,707,650	6,089,483,774	17%	3	25%	134.9	9,150,797,856
Golden State Water Company Simi Valley	1,830,698,487	1,657,215,187	173,483,300	9%	3	25%	134.9	457,674,622
Fullerton City of	7,215,373,767	6,969,105,034	246,268,733	3%	3	25%	135.0	1,803,843,442
Pasadena City of	8,349,297,631	7,614,975,148	734,322,483	9%	3	25%	136.2	2,087,324,408
Suburban Water Systems Whittier/La Mirada	5,584,910,982	5,234,793,399	350,117,583	6%	3	25%	136.3	1,396,227,746
Big Bear City Community Services District	266,135,884	256,898,007	9,237,888	3%	3	25%	136.3	66,533,974
Lake Hemet Municipal Water District	2,880,852,466	2,579,961,258	300,891,208	10%	3	25%	136.4	720,213,117
Suisun-Solano Water Authority	1,038,300,000	918,300,000	120,000,000	12%	3	25%	136.5	259,575,000
Diablo Water District	1,487,225,000	1,338,770,000	148,455,000	10%	3	25%	137.8	371,806,250
Garden Grove City of	5,584,316,860	6,185,605,054	998,711,806	6%	3	25%	138.3	1,646,079,215
Woodland City of	2,938,159,020	2,454,292,204	483,866,816	16%	3	25%	139.0	734,539,755
Antioch City of	4,642,068,000	4,042,093,000	599,975,000	13%	3	25%	139.0	1,160,517,000
Contra Costa Water District	8,855,338,380	7,507,370,752	1,307,967,628	15%	3	25%	139.9	2,213,834,595
Rialto City of	2,544,482,555	2,596,683,954	-52,201,399	-2%	3	25%	140.8	636,120,639
Sunnylope County Water District	694,319,032	596,249,460	98,069,572	14%	3	25%	141.5	173,579,758
San Bernardino City of	11,595,034,614	10,722,937,586	872,097,028	7%	3	25%	143.6	2,883,758,654
Cerritos City of	2,219,233,953	1,991,297,621	227,936,332	10%	3	25%	143.7	554,808,488
San Jacinto City of	756,372,530	651,046,816	105,325,714	14%	3	25%	144.1	189,093,133
Tulare City of	4,305,328,900	4,324,313,800	-18,984,900	-0%	3	25%	144.7	1,201,332,225
Sacramento County Water Agency	9,991,675,171	8,451,666,395	1,540,008,776	15%	3	25%	145.3	2,497,918,793
Benicia City of	1,543,102,018	1,217,315,761	325,786,257	21%	3	25%	146.1	385,775,505
Orange City of	7,732,617,288	7,437,395,896	295,221,393	4%	3	25%	146.3	1,933,154,322
Stockton City of	8,304,530,000	7,263,300,000	1,041,230,000	13%	3	25%	146.3	2,076,132,500
Ceres City of	1,985,969,000	1,848,968,000	137,001,000	7%	3	25%	147.3	496,492,250
Monrovia City of	1,885,000,000	1,675,000,000	210,000,000	11%	3	25%	147.5	471,250,000
Chino City of	3,332,449,959	3,123,999,542	208,450,416	6%	3	25%	147.6	833,112,490
Apple Valley Ranchos Water Company	4,101,713,205	3,942,264,436	159,448,769	4%	3	25%	147.7	1,025,428,401
Sonoma City of	583,798,675	494,362,244	89,436,441	15%	3	25%	147.8	145,949,669
Humboldt Bay Municipal Water District	146,056,000	148,820,000	-2,764,000	-2%	3	25%	148.1	36,514,000
Victorville Water District	4,985,852,685	4,486,322,447	499,530,238	10%	3	25%	149.1	1,246,463,171
Paso Robles City of	1,705,474,000	1,511,094,000	194,380,000	11%	3	25%	149.5	426,368,500
Sanger City of	1,552,776,000	1,422,246,000	130,530,000	8%	3	25%	149.6	388,194,000
Rubidoux Community Service District	1,400,190,000	1,335,510,000	64,680,000	5%	3	25%	149.8	350,047,500
Phelan Pinon Hills Community Services District	635,139,826	675,206,517	-40,066,691	-6%	3	25%	150.3	158,784,957
Covina City of	1,500,350,310	1,393,914,200	106,436,110	7%	3	25%	150.4	375,087,578
California-American Water Company Los Angeles District	5,179,473,754	5,179,473,754	0	0%	3	25%	151.4	1,394,938,189
Golden State Water Company San Dimas	3,069,589,946	2,950,649,842	118,940,105	4%	3	25%	151.4	765,897,487
Patterson City of	1,040,156,104	948,595,320	91,560,784	9%	3	25%	151.9	260,039,026

Yreka, City of	593,290,000	519,800,000	73,490,000	12%	3	25%	151.9	148,372,500
Trabuco Canyon Water District	764,121,595	767,705,962	-3,584,366	0%	3	25%	152.4	191,030,399
Arvin Community Services District	740,072,884	667,768,501	72,304,383	10%	3	25%	153.6	185,018,221
San Diego Water District	1,583,703,106	1,621,176,020	-37,472,914	-2%	3	25%	154.0	395,925,777
Atascadero Mutual Water Company	1,291,000,000	1,056,900,000	234,100,000	18%	3	25%	154.6	322,750,000
Santa Paula City of	1,218,270,506	1,081,725,724	136,544,782	11%	3	25%	154.7	304,567,627
Manteca City of	3,844,580,000	3,212,645,000	631,935,000	16%	3	25%	154.9	961,145,000
Castaic Lake Water Agency Santa Clarita Water Division	7,358,051,073	6,493,567,237	864,483,836	12%	3	25%	154.9	1,839,512,768
Roseville City of	8,448,024,096	6,980,859,852	1,517,164,244	18%	3	25%	155.0	2,112,006,024
La Verne City of	2,094,159,441	1,955,656,970	138,502,471	7%	3	25%	155.2	523,539,785
Nipomo Community Services District	665,258,273	527,032,098	138,226,175	21%	3	25%	156.0	171,855,000
Imperial City of	687,420,000	671,127,000	16,293,000	2%	3	25%	156.1	171,855,000
Lamont Public Utility District	993,121,000	914,688,000	78,433,000	8%	3	25%	156.4	248,280,250
Walnut Valley Water District	5,119,451,770	4,877,344,159	242,107,610	5%	3	25%	158.4	1,279,862,943
Chino Hills City of	3,952,965,804	3,587,674,904	365,290,900	9%	3	25%	159.1	988,241,451
Thousand Oaks City of	3,106,654,920	2,792,709,655	313,925,265	10%	3	25%	159.3	776,658,750
Rosamond Community Service District	719,200,000	712,000,000	7,200,000	1%	3	25%	160.4	179,800,000
Corona City of	8,699,410,000	8,297,070,000	402,340,000	5%	3	25%	160.4	2,174,852,500
Hesperia Water District City of	3,676,581,651	3,588,094,794	138,486,856	4%	3	25%	160.5	919,145,413
Fillmore City of	482,079,202	446,216,000	35,863,202	7%	3	25%	160.6	120,519,801
Joshua Basin Water District	409,078,118	382,604,644	26,473,473	6%	3	25%	161.3	102,269,530
Calaveras County Water District	1,468,943,000	1,200,100,000	268,743,000	18%	3	25%	161.5	367,210,750
East Valley Water District	5,405,695,956	4,782,879,831	622,816,125	12%	3	25%	161.7	1,351,423,989
Tustin City of	2,984,049,613	2,895,189,929	88,859,684	3%	3	25%	162.0	746,012,403
Brentwood City of	3,088,220,000	2,663,210,000	375,010,000	12%	3	25%	162.5	928,676,567
California Water Service Company Los Altos/Suburban	3,714,706,268	3,136,645,836	578,060,431	16%	3	25%	162.5	759,555,000
Mission Springs Water District	2,072,832,166	1,979,439,888	93,392,277	5%	3	25%	162.7	518,208,042
Yuba City City of	4,215,490,000	3,629,080,000	586,410,000	14%	3	25%	162.7	1,053,872,500
Palmdale Water District	5,291,175,472	5,010,063,446	281,112,026	5%	3	25%	163.2	1,322,793,868
California-American Water Ventura District	4,397,006,572	3,988,454,052	408,552,519	9%	3	25%	163.6	1,099,251,643
Porterville City of	3,123,277,400	2,849,237,200	274,040,200	9%	3	25%	164.0	780,819,350
Madera City of	2,268,255,000	2,115,715,000	152,520,000	7%	3	25%	164.8	567,058,750
Golden State Water Company Ojai	564,830,864	487,636,661	77,194,203	14%	4	30.00%	165.5	169,449,259
Blythe City of	806,370,000	811,680,000	-5,310,000	-1%	4	30.00%	165.5	241,911,000
South Pasadena City of	1,045,005,526	935,193,595	1,098,811,931	11%	4	30.00%	166.1	313,501,658
Ramona Municipal Water District	1,087,105,591	1,049,746,665	37,358,866	3%	4	30.00%	166.8	326,131,659
La Habra City of Public Works	2,397,728,848	2,535,032,864	-137,304,016	-6%	4	30.00%	167.3	719,318,654
Banning City of	2,219,758,574	2,038,002,667	161,755,907	7%	4	30.00%	167.7	665,927,572
Livingston City of	1,870,481,000	1,810,513,000	59,968,000	3%	4	30.00%	167.9	561,144,300
Dinuba City of	1,126,830,000	977,550,000	149,280,000	13%	4	30.00%	169.8	338,049,000
Folsom City of	5,476,678,514	4,592,545,306	884,133,208	16%	4	30.00%	170.7	1,643,003,554
Loma Linda City of *	1,379,980,589	1,323,839,525	56,151,044	4%	4	30.00%	172.4	413,997,171
Hanford City of	3,229,776,700	2,793,029,816	436,746,884	14%	4	30.00%	173.6	968,933,010
Lemoore City of	1,967,044,000	1,783,354,000	183,690,000	9%	4	30.00%	174.0	590,113,200
Jurupa Community Service District	6,546,170,411	6,107,698,865	438,471,545	7%	4	30.00%	174.1	1,963,851,123
Turlock City of	5,571,505,100	4,909,059,441	662,445,659	12%	4	30.00%	174.1	1,671,451,530
Pismo Beach City of	434,216,578	359,495,578	74,720,991	17%	4	30.00%	175.1	130,264,973
Indio City of	5,340,000,000	5,006,100,000	333,900,000	6%	4	30.00%	175.2	1,602,000,000
Mammoth Community Water District	499,483,000	447,407,000	52,076,000	10%	4	30.00%	175.6	149,844,900
California Water Service Company Selma	1,492,399,536	1,259,212,977	233,186,559	17%	4	30.00%	176.6	447,719,861
California Water Service Company Visalia	8,033,215,230	7,144,292,537	888,922,693	11%	4	30.00%	176.6	2,409,964,569
Hemet City of	1,116,063,947	1,045,970,047	70,093,900	6%	4	30.00%	176.6	334,819,184
Western Municipal Water District of Riverside	5,887,379,311	5,683,989,367	203,389,944	3%	4	30.00%	176.9	1,766,213,793
Newhall County Water District	2,611,216,927	2,326,139,289	285,077,638	11%	4	30.00%	178.5	783,365,078
West Kern Water District	4,045,106,581	3,679,048,346	366,058,235	9%	4	35.00%	180.2	1,415,787,303
Rincon Del Diablo Municipal Water District	1,766,766,437	1,514,883,284	251,883,153	14%	4	35.00%	182.2	618,368,253
Shafter City of	1,350,000,000	1,154,000,000	196,000,000	15%	4	35.00%	182.9	472,900,000
Triunfo Sanitation District / Oak Park Water Service	687,285,830	597,937,369	89,348,461	13%	4	35.00%	184.0	240,550,041
Vacaville City of	4,536,829,418	3,868,833,993	667,995,425	15%	4	35.00%	185.5	1,587,890,296
Los Angeles County Public Works Waterworks District 40	12,870,711,018	11,980,791,220	889,919,798	7%	4	35.00%	185.6	4,504,748,856
California Water Service Company Bakersfield	18,863,864,960	16,841,305,153	2,022,559,807	11%	4	35.00%	186.2	6,602,352,736
Galt City of	1,302,667,000	1,052,546,000	250,121,000	19%	4	35.00%	186.4	455,933,450

Cuamonga Valley Water District	12,916,078,335	12,778,430,872	137,647,463		1%	4	35.00%	187.6	4,520,627,417
Wasco City of	1,096,680,000	952,170,000	144,510,000		13%	4	35.00%	187.6	383,838,000
California Water Service Company Chico District	6,759,462,002	5,680,893,778	1,078,568,223		16%	4	35.00%	188.1	2,365,811,701
South Tahoe Public Utilities District	1,641,227,000	1,550,474,000	90,753,000		6%	4	35.00%	189.3	574,479,450
Winton Water & Sanitary District	432,243,000	400,904,000	31,339,000		7%	4	35.00%	189.3	151,285,050
Carlsbad Municipal Water District	4,342,002,850	4,259,269,173	82,733,677		2%	4	35.00%	189.3	1,519,700,998
Riverbank City of	860,786,846	797,503,990	123,282,856		14%	4	35.00%	191.6	301,275,396
Modesto, City of	15,589,770,183	13,698,086,925	1,891,683,258		12%	4	35.00%	192.7	3,456,419,564
El Dorado Irrigation District	10,044,044,386	7,680,810,386	2,443,234,000		24%	4	35.00%	193.1	3,515,415,535
Morgan Hill City of	2,262,311,000	1,786,089,000	476,222,000		21%	4	35.00%	193.4	791,808,850
Exeter City of	600,332,681	535,287,408	65,045,273		11%	4	35.00%	194.4	210,116,438
Kerman, City of	880,465,000	769,624,000	110,841,000		13%	4	35.00%	194.7	308,162,750
Cirrus Heights Water District	3,723,178,405	3,023,575,391	699,603,014		19%	4	35.00%	195.4	1,303,112,442
San Bernardino County Service Area 70	457,321,702	431,251,330	26,071,373		6%	4	35.00%	196.0	160,067,946
Colton, City of	2,519,711,330	2,487,549,794	32,161,536		1%	4	35.00%	196.0	881,898,966
Georgetown Divide Public Utilities District	512,901,000	410,416,000	102,485,000		20%	4	35.00%	196.4	179,515,350
Oakdale City of	1,417,000,000	1,139,000,000	278,000,000		20%	4	35.00%	197.6	495,950,000
Elk Grove Valley Municipal Water District	6,567,437,756	6,285,445,931	281,991,825		4%	4	35.00%	199.6	2,298,603,215
Fallbrook Public Utility District	3,340,661,415	3,012,288,347	328,393,068		10%	4	35%	200.0	1,169,231,495
Sierra Madre City of	616,142,059	546,575,118	69,566,941		11%	4	35%	203.6	215,649,721
Atwater City of	2,358,960,000	1,821,770,000	537,190,000		23%	4	35%	203.7	825,636,000
Lee Lake Water District	760,491,304	738,717,756	21,773,548		3%	4	35%	204.4	266,171,956
Poway City of	2,984,245,124	2,893,299,991	90,945,133		3%	4	35%	204.8	1,044,485,793
Shasta Lake City of	309,004,338	258,461,000	50,543,338		16%	4	35%	205.5	108,151,518
Newport Beach City of	4,220,349,478	3,924,557,845	295,791,633		7%	4	35%	206.6	1,477,122,317
Redding City of	7,109,010,000	5,934,100,000	1,174,910,000		17%	4	35%	208.2	2,488,153,500
Lodi City of Public Works Department	3,904,230,000	3,932,720,000	-28,490,000		-1%	4	35%	209.1	1,366,480,500
Elk Grove Water Service	1,982,552,982	1,615,618,816	366,934,166		19%	4	35%	209.7	693,893,544
Ventura County Waterworks District No 1	2,686,665,294	2,241,890,403	444,774,892		17%	4	35%	210.1	941,032,853
Golden State Water Company Orcutt	1,941,781,239	1,705,636,709	236,144,529		12%	4	35%	210.1	679,623,434
Lincoln City of	2,592,190,000	2,158,050,000	434,140,000		17%	4	35%	211.1	907,266,500
West Valley Water District	5,029,549,361	4,747,549,536	281,991,825		6%	4	35%	211.6	1,760,342,276
Sacramento Suburban Water District	9,630,759,000	8,318,514,000	1,312,245,000		14%	4	35%	212.9	3,370,765,650
Nevada Irrigation District	2,750,729,000	2,399,997,000	350,732,000		15%	4	35%	215.7	962,755,150
Rubio Canyon Land and Water Association	561,116,157	508,002,375	53,113,783		9%	4	35%	215.9	196,390,655
Norco City of	2,009,949,357	1,856,691,656	153,257,702		8%	4	35%	216.1	703,482,275
Beverly Hills City of	2,984,049,613	2,900,957,499	83,092,114		3%	4	35%	216.6	1,044,477,365
Carmichael Water District	2,598,570,000	2,107,250,000	491,320,000		19%	4	35%	220.2	909,499,500
Riverside Highland Water Company	971,591,200	889,248,544	82,342,656		8%	4	35%	220.9	340,056,920
Yorba Linda Water District	5,380,523,933	5,128,021,662	252,502,271		5%	4	35%	221.3	1,883,183,377
Olivethain Municipal Water District	5,326,497,766	5,149,755,952	176,741,814		3%	4	35%	222.0	1,864,274,218
Olivehurst Public Utility District	1,161,641,529	959,245,393	202,396,137		17%	4	35%	222.4	864,574,535
Rio Linda - Elverta Community Water District	770,017,991	629,595,315	140,422,076		18%	4	35%	225.0	269,506,087
Upland City of	5,523,683,657	5,024,215,355	499,468,301		9%	4	35%	226.2	1,933,289,280
Discovery Bay Community Services District	986,000,000	808,000,000	178,000,000		18%	4	35%	226.5	345,100,000
California Water Service Company Bear Gulch	3,623,142,017	3,228,861,790	394,280,227		11%	4	35%	227.7	1,268,099,706
Corcoran City of	1,162,447,000	950,206,000	212,241,000		18%	4	35%	228.4	406,856,450
Glendora City of	3,108,798,089	3,089,127,284	19,670,805		1%	4	35%	228.9	1,088,079,331
Los Banos, City of	2,053,870,000	1,905,101,000	148,769,000		7%	4	35%	229.2	718,854,500
Clovis City of	6,737,008,000	6,080,857,000	656,156,000		10%	4	35%	229.8	2,357,952,800
Camrosa Water District	2,469,015,365	2,141,221,863	327,793,502		13%	4	35%	231.4	864,155,378
East Niles Community Service District	2,504,168,216	2,213,508,744	290,659,473		12%	4	35%	231.4	876,458,876
Rio Vista, city of	641,312,000	606,333,000	34,979,000		5%	4	35%	235.0	224,459,200
Placer County Water Agency	7,686,123,771	6,395,079,193	1,291,044,578		17%	4	35%	235.1	2,690,143,320
West Sacramento City of	3,567,747,274	2,941,460,832	626,286,443		18%	4	35%	238.5	1,248,711,546
Montecito Water District	1,577,349,003	836,688,709	740,660,294		47%	4	35%	240.5	552,072,151
Paradise Irrigation District	1,721,400,000	1,355,900,000	365,500,000		21%	4	35%	241.1	602,490,000
Fruitridge Vista Water Company	1,000,084,300	823,053,400	177,030,900		18%	4	35%	242.3	350,029,505
Los Angeles County Public Works Waterworks District 29	2,383,427,229	2,356,081,777	27,345,452		1%	4	35%	242.8	834,199,530
Fair Oaks Water District	3,068,959,978	2,450,034,519	618,925,459		20%	4	35%	243.3	1,074,135,992
Indian Wells Valley Water District	1,861,884,000	1,789,365,000	72,519,000		4%	4	35%	244.1	651,659,400
San Bernardino County Service Area 64	758,722,238	679,807,540	78,914,699		10%	4	35%	246.3	265,552,783

Pinedale County Water District	267,792,348	224,289,932	43,502,416	16%	4	35%	247.0	93,727,322
Truckee-Donner Public Utilities District	1,264,764,466	1,144,274,188	120,490,278	10%	4	35%	247.8	442,667,563
Anderson, City of	572,342,000	498,676,000	73,666,000	13%	4	35%	248.6	200,319,700
Golden State Water Company Claremont	2,873,781,490	2,604,204,605	269,576,885	9%	4	35%	248.9	1,005,823,522
California Water Service Company Palos Verdes	5,184,622,055	4,979,661,507	204,960,548	4%	4	35%	250.9	1,814,617,719
California City of	1,192,746,583	1,264,824,899	-72,078,316	-6%	4	35%	251.3	417,461,297
Casitas Municipal Water District	777,155,653	678,096,820	99,058,834	13%	4	35%	253.2	272,004,479
Yucaipa Valley Water District	2,981,840,000	2,837,629,000	144,211,000	5%	4	35%	253.4	1,043,644,000
Golden State Water Company Cordova	4,051,962,495	3,483,514,680	568,447,814	14%	4	35%	265.5	1,418,186,873
Red Bluff, City of	904,393,249	764,891,212	139,502,037	15%	4	35%	270.9	316,537,637
East Orange County Water District	1,037,655,497	225,554,358	21,506,194	9%	4	35%	271.6	86,471,193
Bakman Water Company	1,032,655,497	893,235,946	139,419,551	14%	4	35%	277.3	361,429,424
Bakersfield, City of	11,705,594,680	10,744,390,565	961,204,114	8%	4	35%	277.5	4,096,958,138
Merced, City of	6,829,130,000	6,271,910,000	600,220,000	9%	4	35%	279.6	2,405,245,500
Hillsborough, Town of	877,331,034	658,647,771	218,683,262	25%	4	35%	281.2	307,065,862
Ripon, City of	1,431,002,833	1,223,409,134	207,593,699	15%	4	35%	282.0	500,850,992
Susansville, City of	560,250,000	602,070,000	-41,820,000	-7%	4	35%	287.6	196,087,500
Valley Center Municipal Water District	6,829,813,325	6,798,466,417	31,346,907	0%	4	35%	288.4	2,390,434,664
Bella Vista Water District	3,596,422,200	1,864,847,717	1,731,574,483	48%	4	35%	288.7	1,258,747,770
California Water Service Company Antelope Valley	186,061,165	216,691,199	-30,630,034	-16%	4	35%	291.4	65,121,408
Arcadia, City of	4,352,404,027	4,033,916,843	318,487,185	7%	4	35%	291.5	1,523,341,409
Madiera County	891,468,716	660,496,910	230,971,806	26%	4	35%	298.4	312,014,051
Oildale Mutual Water Company	2,485,920,537	2,317,129,497	168,791,039	7%	4	35%	308.5	870,072,188
Tahoe City Public Utilities District	372,523,331	326,265,848	46,257,483	12%	4	35%	307.8	130,383,166
Kingsburg, City of	1,009,319,000	825,793,000	183,526,000	18%	4	35%	308.0	353,261,650
Quartz Hill Water District	1,430,054,382	1,276,190,597	153,863,785	11%	4	35%	308.1	500,519,034
Linda County Water District	971,706,000	880,037,000	91,669,000	9%	4	35%	312.3	340,097,100
Las Virgenes Municipal Water District	5,714,163,209	5,470,784,778	243,378,431	4%	4	35%	323.0	1,999,957,123
California Water Service Company Westlake	2,085,449,133	1,928,388,745	157,060,388	8%	4	35%	326.5	729,907,197
Orange Vale Water Company	1,274,470,101	1,008,190,832	266,279,269	21%	4	35%	336.2	446,064,535
Redlands, City of	7,033,861,488	6,969,114,810	64,746,679	1%	4	35%	341.5	2,461,851,521
Rancho California Water District	16,377,618,572	16,074,902,597	302,715,976	2%	4	35%	366.9	5,732,166,500
Coachella Valley Water District	28,323,853,249	27,188,261,025	1,135,592,223	4%	4	35%	368.7	9,913,348,637
Desert Water Agency	8,823,730,792	8,310,188,943	513,541,849	6%	4	35%	378.5	3,088,305,777
San Juan Water District	3,594,268,324	2,773,624,539	820,643,785	23%	4	35%	383.7	1,257,993,913
South Feather Water and Power Agency	1,435,400,000	1,292,100,000	143,300,000	10%	4	35%	391.5	502,390,000
Valley Water Company	999,093,060	898,861,161	100,231,899	10%	4	35%	396.6	349,682,571
Rainbow Municipal Water District	3,976,593,060	3,760,749,074	215,843,985	5%	4	35%	428.5	1,391,807,571
Vaughn Water Company	3,206,837,858	2,989,389,519	217,448,339	7%	4	35%	464.6	1,122,393,250
Serrano Water District	829,682,903	749,230,186	80,452,717	10%	4	35%	520.1	290,389,016
Golden State Water Company Cowan Heights	703,676,157	691,163,462	12,512,695	2%	4	35%	556.5	246,286,651
Miyoma Dunes Mutual Water Company	757,700,108	707,153,944	50,546,164	7%	4	35%	562.7	265,195,038
Santa Fe Irrigation District	2,820,155,121	2,869,480,251	-49,324,131	-2%	4	35%	584.3	987,054,642
<b>TOTAL</b>	<b>1,623,466,506,867</b>	<b>1,474,345,721,707</b>	<b>151,557,632,372</b>					<b>405,796,845,317.0</b>

Percent Saved 25.00%