

Department of Health Recommendation

Service Meter Waiver Request

WAC 246-290-496 Metering Requirements

Magna Vista Water Company requests a waiver to the installation of service meters at each of its eighteen homes, as required in the Group A Water Supplies rule - WAC 246-290-496(2). The Department of Health's Office of Drinking Water oversees the administration of this rule and recommends the Board not grant the waiver.

History

In 2003, the legislature passed a bill commonly known as the Municipal Water Law. This legislation was a major reform to the state water code by creating flexibility in the use of water rights held for municipal water supply purposes while also establishing water use efficiency (WUE) standards for municipal water suppliers.

One of the most important requirements of the Municipal Water Law underscores the importance of maintaining the integrity and health of water distribution systems in order to provide a safe and reliable supply of water. In doing so, the legislature required that all municipal water suppliers leak no more than ten percent of the water that runs through their distribution systems. When the department adopted the WUE rule, we concluded, with the help of a diverse set of stakeholders, that the only way for a water system to accurately measure compliance with the law's distribution leakage standard was to install source meters and service meters on each residential connection. The difference between the source meter and the consumer's service meters represents the percentage and volume of losses.

The Magna Vista Water Company is a municipal water supplier because they serve at least 15 residential service connections, therefore this water system was granted flexibility in the use of their water rights, but must also comply with the WUE rule. The WUE rule became effective on January 22, 2007.

Progress to Date

The adopted WUE rule allowed ten years for municipal water suppliers to install service meters, the deadline is January 22, 2017. There are approximately 700 water systems with 50 or fewer connections that are required to install service meters. Of those 700, over 85% have completed meter installation or are working towards completing it by the deadline.

Benefits to Meter Installation

There are many benefits of service meter installation:

- Water systems can better account for and resolve water losses that occur within the distribution system versus leaks occurring on personal property.
- Service meters give more control to the property owner to understand variations in water use and manage accordingly.
- Service meters allow systems to establish a use-based rate structure which encourages conservation, can support improved financial capacity to support water system improvements and often result in reduced pumping from the water source.
- Repairing leaky pipes will not only save the water system money on treatment, storage and energy costs, but most importantly result in better public health protection as deteriorating distribution pipes get replaced, thereby reducing the threat of water outages and contamination when the system loses pressure due to leaks.

While we understand the concerns raised by Magna Vista Water Company, we believe the rules should be applied consistently and see no extraordinary circumstances that warrant granting a waiver in this case. The legislature provided a clear leakage standard and charged the department with ensuring that systems work to achieve the standard. The requirement also supports protection of public health by helping to ensure the integrity of distribution systems throughout the state. If a waiver is granted in this case, we are concerned this would result in an inequitable application of the rule, in particular for those systems who have already invested and installed meters. It could also set a precedent that will encourage other waiver requests.

The Office of Drinking Water has done extensive outreach to Group A systems to help them understand how to comply with the WUE rule. We have developed a wide array of technical assistance information and held trainings with a particular emphasis on small water systems. Each year, since 2007 the department reminds water systems to submit the required annual water efficiency report and identify progress made installing meters. Magna Vista has been aware of the metering requirement because they have completed the annual report each year since 2010. In July 12, 2016, Magna Vista held a teleconference with the department to discuss meter alternative options. We provided technical assistance by offering ideas to reduce costs for meter installation, an extension of time to comply, and how to finance the meter project.

We recognized that metering represents a significant capital expense and this is why the rule provided ten years for systems to plan, finance and install the meters. We are prepared to work with Magna Vista Water Company and other systems still working toward compliance to develop a plan to achieve compliance and extend the meter deadline through any of the compliance assurance tools available to the department. We also stand ready to provide technical assistance to help find solutions that will reduce the cost for meter installation. We

believe that this flexibility will allow this water system to achieve compliance without creating an undue financial burden on its customers.

We therefore respectfully recommend the State Board of Health not grant the waiver to the service meter installation requirement for Magna Vista Water Company.