

Defining “Substantial” Percentage of Industrial Water Use Draft (08/02/2010)

SBx 7-7 “would require the state to achieve a 20% reduction in urban per capita water use in California by December 31, 2020. The state would be required to make incremental progress towards this goal by reducing per capita water use by at least 10% on or before December 31, 2015. The bill would require each urban retail water supplier to develop urban water use targets and an interim urban water use target, in accordance with specified requirements. The bill would require agricultural water suppliers to implement efficient water management practices. The bill would require the department, in consultation with other state agencies, to develop a single standardized water use reporting form. The bill, with certain exceptions, would provide that urban retail water suppliers, on and after July 1, 2016, and agricultural water suppliers, on and after July 1, 2013, are not eligible for state water grants or loans unless they comply with the water conservation requirements established by the bill. The bill would repeal, on July 1, 2016, an existing requirement that conditions eligibility for certain water management grants or loans to an urban water supplier on the implementation of certain water demand management measures.”

The bill authorizes the department, through a public process and in consultation with the California Urban Water Conservation Council, to develop methodologies and criteria for calculating base daily per capita water use, interim daily per capita water use, and compliance daily per capita water use. Calculating the base, interim, and compliance per capita water uses would require estimating gross water use. Gross water is defined in the statute as (Section 10608.12 (l)) “the total volume of water, whether treated or untreated, entering the distribution system of an urban retail water supplier”. The bill provides credits to existing water conservation measures by subtracting them from the estimated gross water use. Section 10608.24 (e) states that “When developing the urban water use target pursuant to Section 10608.20, an urban retail water supplier that has a substantial percentage of industrial water use in its service are, may exclude process water from the calculation of gross water use to avoid a disproportionate burden on another customer sector.”

Process water is defined in the statute as (Section 10608.12 (l)) “water used for producing a product or product content or water used for research and development, including, but not limited to, continuous manufacturing processes, water used for testing and maintaining equipment used in producing a product or product content, and water used in combined heat and power facilities used in producing a product or product content. Process water does not mean incidental water uses not related to the production of a product or product content, including, but not limited to, water used for restrooms, landscaping, air conditioning, heating, kitchens, and laundry.”

This draft document is prepared to present an initial attempt by the department at defining what constitutes “substantial” percentage of industrial water use and, in the process, showing the “disproportionate burden” on another customer sector.

Data Source

The water use data for years 2005 through 2008 were obtained from the California Urban Water Conservation Council (CUWCC) to assess the extent of industrial water use throughout the state. Any conclusions and recommendations made by DWR are not those of the CUWCC.

Table 1 shows the total number of water suppliers who have complete data sets for calculating the percentage of industrial water use for each year. The data used in this analysis represents approximately 30 percent of the total water suppliers in the state. Although it may not be a random sampling, we believe that the data is representative of all water suppliers' state wide and distributions will remain similar. Tables 3 and 4 present lists of urban water suppliers that were used in this analysis.

Table 1. Total number of water suppliers for each year with complete data sets to estimate percentage of industrial water use.

Year	Number of Suppliers
2005	146
2006	147
2007	149
2008	150

Data Analysis

The first step in this analysis was to calculate the ratio of industrial water use to the total water use. This ratio was placed in a new data column of the spreadsheet and sorted from lower to higher values. Figure 1 shows histogram of these ratios for the year 2005. Histograms of ratios for years 2006 through 2008 are very similar to the year 2005 and therefore are not shown here. What is clear from the histograms is that most retail suppliers industrial water use is a very small fraction of their total water use.. The cumulative percent of a ratio, say X, was calculated as the number of data points (retail suppliers) with ratios less than or equal to X to the total number of data points (retail suppliers). This is done to obtain quantile plots of the data from which "substantial" percentage of industrial water use is to be determined. Although the law doesn't define substantial explicitly, it refers to the amount of industrial water use that may cause disproportionate burden on other customer sectors. It has to be understood that the cut off point for what is to be "substantial" can only be determined based on scientific knowledge or regulatory decisions. Since "substantial" and "disproportionate burden" were available here, in this discussion paper an initial cut off point of 80 percent of the total retail water suppliers was selected for demonstration purposes.

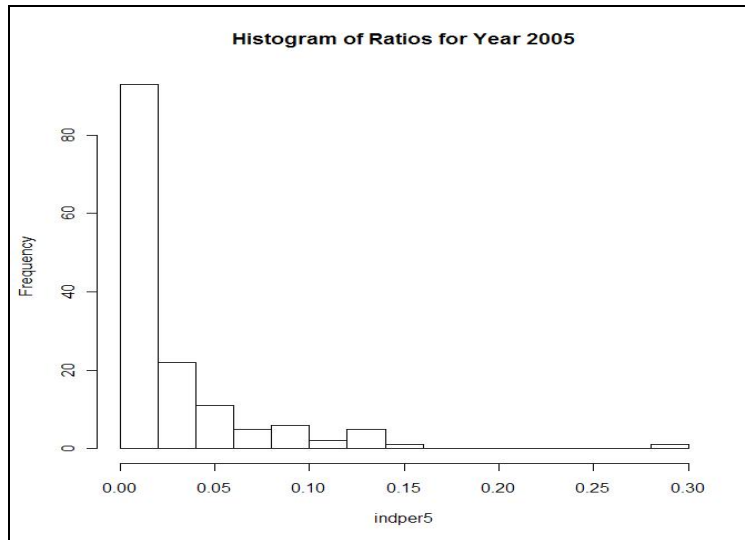


Figure 1. Histogram of ratios of industrial water use to total water use for the year 2005.
Results

Figure 2 shows the cumulative percentage of retail water suppliers versus the ratio of industrial water use to total water use for years 2005 through 2008. It is clear from this figure that there are slight differences across the years. Therefore, average values were calculated at a given cumulative percentage value. Table 2 shows results of such calculations for cumulative percentage values 60 through 95 in increments of 5.

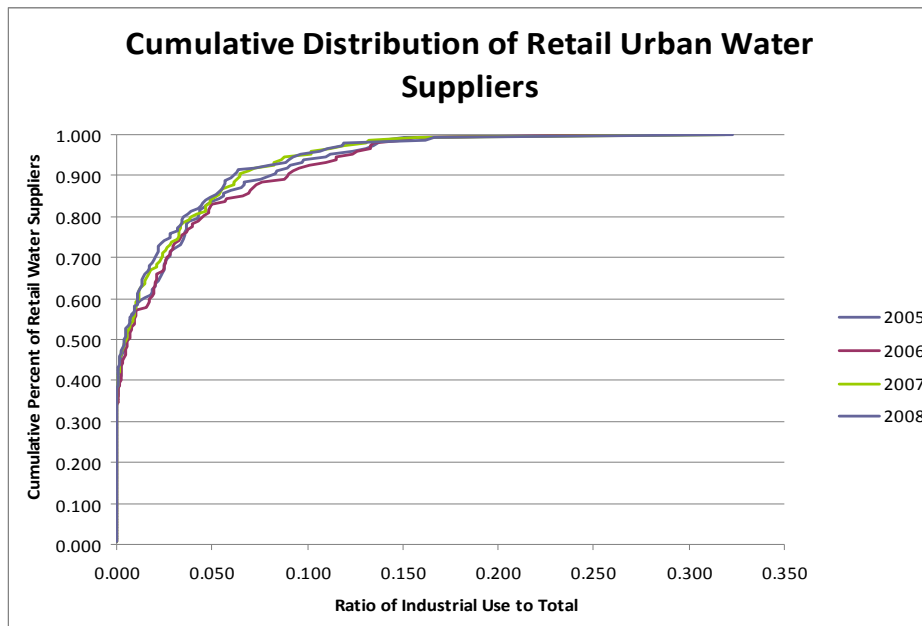


Figure 2. Cumulative distribution of retail urban water suppliers for years 2005 through 2008.

Using Figures (1 & 2) and Table 2, it was decided to first look at a cumulative percentage of 80 percent of the total retail water suppliers which would include a significant numbers of retail water suppliers, resulting in a 4 percent of industrial water use ratio.

Table 2. Percentage industrial water use by years for cumulative percentiles of 60-95.

Percentile	Percentage Industrial Water Use				
	2005	2006	2007	2008	Average
60	1.5	1.8	1.2	1.1	1.0
65	2.3	2.1	1.5	1.4	1.8
70	2.7	2.7	2.4	2.0	2.0
75	3.6	3.4	3.2	2.8	3.0
80	4.3	4.6	4.0	3.5	4.0
85	5.6	6.6	5.3	5.1	5.7
90	8.1	9.0	6.4	6.2	7.0
95	11.2	12.3	10.1	9.4	10.8

Disproportionate Burden

The statute states that an urban retail water supplier that has substantial percentage of industrial water use in its service area may exclude process water from the calculation of gross water use to avoid a disproportionate burden on another customer service. After selecting an initial cumulative percentage of 80 percent as a cut-off point, resulting in 4 percent or more of industrial water use, compared to the total water use, as substantial water use, we then assessed the effect of the industrial water use on gpcd of the service area. Figure 3 shows the cumulative percentage of retail water suppliers versus the gpcd from the industrial water use alone for years 2005-2008. From this it is estimated that using the 80 percent range would result in an average increase of gpcd of 7.5 gallons. The increase of 7.5 gpcd doesn't appear to be significant impact and doesn't create disproportionate burden on other customers. [it may be useful to show the average gpcd of the water supplies and show 7.5 gpcd is what percentage of the supplier's gpcd] It should be noted that there are a couple of outliers that had values over 300 gpcd. The outliers were not shown on the graph so that the chart clearly shows the trend where the 80 percent intersects the curve. Dropping the outliers from the curve does not affect the analysis.

If we were to raise the cutoff point from the 4 percent range (this includes 20 percent of the water agencies) of total water use to 10 percent (or approximately 6 percent of the water agencies) the net increase to gpcd is approximately 15 gallons (figure 3). This appears to be a more reasonable cut off point defining a disproportionate burden on other customers and in meeting the intent of the statute.

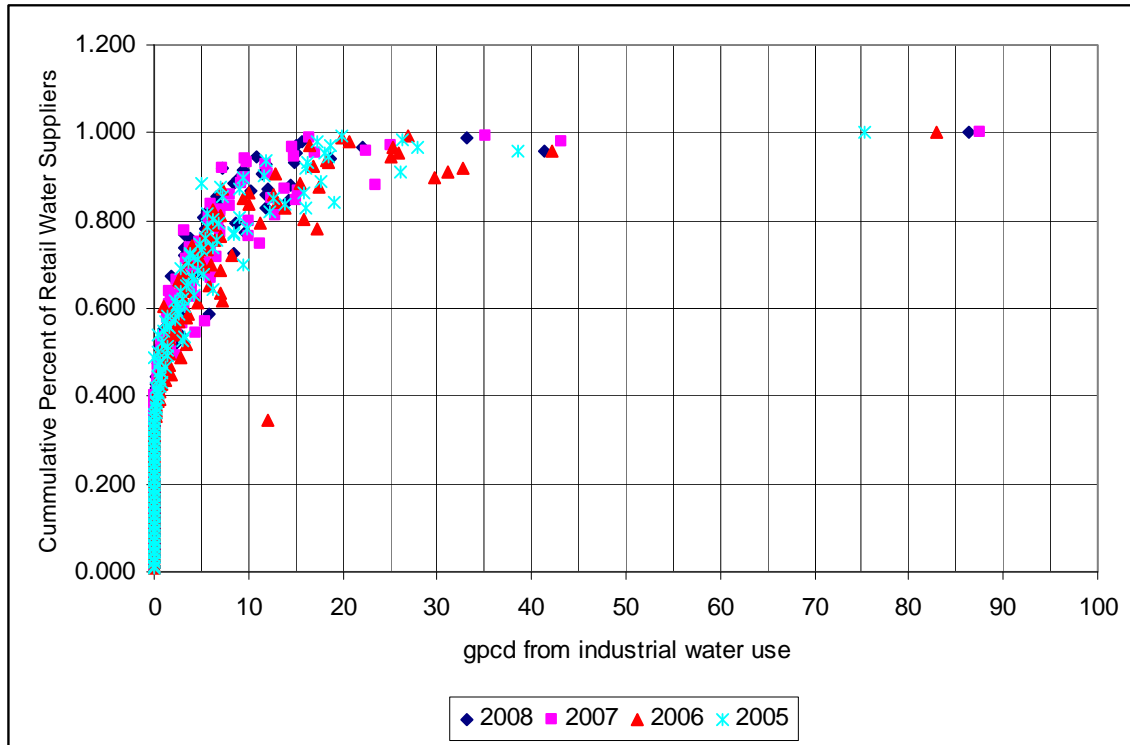


Figure 3. Cumulative distribution of retail urban water suppliers versus gpcd from industrial water use alone.

Table 3. List of Water Suppliers used in the analysis (2005 and 2006).

Year 2005		Year 2006	
Reco rd ID	Unit Name	Reco rd ID	Unit Name
1	Alameda County Water District	185	Alameda County Water District
2	Atascadero Mutual Water Co.	186	Atascadero Mutual Water Co.
5	California Water Service Company - Bakersfield	189	California Water Service Company - Bakersfield
6	California Water Service Company - Bear Gulch	190	California Water Service Company - Bear Gulch
7	California Water Service Company - Chico District	191	California Water Service Company - Chico District
9	California Water Service Company - Dominguez	193	California Water Service Company - Dominguez
10	California Water Service Company - East Los Angeles	194	California Water Service Company - East Los Angeles
11	California Water Service Company - Hermosa / Redondo	195	California Water Service Company - Hermosa / Redondo
14	California Water Service Company - Livermore	198	California Water Service Company - Livermore
15	California Water Service Company - Los Altos District	199	California Water Service Company - Los Altos District
17	California Water Service Company - Mid-Peninsula	200	California Water Service Company - Marysville
18	California Water Service Company - Oroville	201	California Water Service Company - Mid-Peninsula
19	California Water Service Company - Palos Verdes	202	California Water Service Company - Oroville
21	California Water Service Company - Salinas District	203	California Water Service Company - Palos Verdes
22	California Water Service Company - Selma	205	California Water Service Company - Salinas District
23	California Water Service Company - South San Francisco	206	California Water Service Company - Selma
24	California Water Service Company - Stockton	207	California Water Service Company - South San Francisco
25	California Water Service Company - Visalia	208	California Water Service Company - Stockton
26	California Water Service Company - Westlake	209	California Water Service Company - Visalia
28	Camrosa Water District	210	California Water Service Company - Westlake
30	Casitas Municipal Water District	212	Camrosa Water District

32	Citrus Heights WD	213	Carpinteria Valley Water District
33	City of American Canyon	214	Casitas Municipal Water District
34	City of Anaheim, PUD	216	Citrus Heights WD
35	City of Benicia	217	City of American Canyon
36	City of Beverly Hills	218	City of Anaheim, PUD
37	City of Blythe	219	City of Benicia
38	City of Brentwood	220	City of Blythe
39	City of Burbank, PSD	221	City of Brentwood
40	City of Calexico	222	City of Burbank, PSD
42	City of Camarillo	223	City of Calexico
43	City of Coachella	225	City of Camarillo
44	City of Corona, Water Utilities Department	226	City of Coachella
46	City of Davis, Public Works	227	City of Corona, Water Utilities Department
47	City of Escondido	229	City of Davis, Public Works
48	City of Fairfield, Dept of Public Works	230	City of Escondido
49	City of Folsom	231	City of Fairfield, Dept of Public Works
50	City of Fountain Valley	232	City of Folsom
51	City of Fullerton	233	City of Fountain Valley
52	City of Garden Grove	234	City of Fresno
53	City of Glendale, Public Services Dept.	235	City of Fullerton
55	City of Hayward	236	City of Garden Grove
56	City of Hollister	237	City of Glendale, Public Services Dept.
57	City of Huntington Beach	239	City of Hayward
58	City of La Verne	240	City of Hollister
59	City of Manteca	241	City of Huntington Beach
61	City of Mountain View	242	City of La Verne
62	City of Napa	243	City of Manteca
63	City of Oceanside, Water Dept	245	City of Mountain View
64	City of Ontario	246	City of Napa
65	City of Oxnard	247	City of Oceanside, Water Dept
66	City of Palo Alto	248	City of Ontario
68	City of Patterson	249	City of Oxnard
69	City of Petaluma	250	City of Palo Alto
71	City of Pittsburg	252	City of Patterson
72	City of Pomona	253	City of Petaluma
73	City of Poway	255	City of Pittsburg
74	City of Redwood City	256	City of Pomona
76	City of Rohnert Park	257	City of Poway
77	City of Roseville	258	City of Redwood City
78	City of Sacramento - Retail	260	City of Rohnert Park
79	City of San Buenaventura	261	City of Roseville
80	City of San Diego - Retailer	262	City of Sacramento - Retail
81	City of San Jose	263	City of San Buenaventura
82	City of San Juan Capistrano	264	City of San Diego - Retailer
83	City of San Luis Obispo	265	City of San Jose
84	City of Santa Ana	266	City of San Juan Capistrano
85	City of Santa Barbara,	267	City of San Luis Obispo

	PWD		
86	City of Santa Cruz Water Department	268	City of Sanger
87	City of Santa Maria	269	City of Santa Ana
88	City of Santa Monica	270	City of Santa Barbara, PWD
89	City of Santa Rosa	271	City of Santa Cruz Water Department
90	City of Shasta Lake	272	City of Santa Maria
92	City of Thousand Oaks	273	City of Santa Monica
95	Contra Costa WD - Retail	274	City of Santa Rosa
96	Cucamonga Valley Water District	276	City of Thousand Oaks
97	Dublin San Ramon Services District	279	Contra Costa WD - Retail
98	East Bay Municipal Utility District (EBMUD)	280	Cucamonga Valley Water District
100	Eastern Municipal Water District - Retail	281	Dublin San Ramon Services District
101	El Dorado Irrigation District	282	East Bay Municipal Utility District (EBMUD)
102	El Toro Water District	284	Eastern Municipal Water District - Retail
103	Elsinore Valley MWD - Retail	285	El Dorado Irrigation District
104	Fair Oaks Water District	286	El Toro Water District
105	Fallbrook Public Utility District	287	Elsinore Valley MWD - Retail
108	Golden State Water Company - Arden-Cordova	288	Fair Oaks Water District
109	Golden State Water Company - Barstow	289	Fallbrook Public Utility District
110	Golden State Water Company - Bay Point	292	Golden State Water Company - Arden-Cordova
112	Golden State Water Company - Claremont	293	Golden State Water Company - Barstow
115	Golden State Water Company - Metro	294	Golden State Water Company - Bay Point
118	Golden State Water Company - Orange County	296	Golden State Water Company - Claremont
120	Golden State Water Company - San Gabriel Valley	299	Golden State Water Company - Metro
121	Golden State Water Company - Santa Maria	302	Golden State Water Company - Orange County
122	Golden State Water Company - Simi Valley	303	Golden State Water Company - San Dimas
124	Goleta Water District	304	Golden State Water Company - San Gabriel Valley
125	Helix Water District	305	Golden State Water Company - Santa Maria
128	Indian Wells Valley Water District	306	Golden State Water Company - Simi Valley
129	Irvine Ranch Water District	308	Goleta Water District
132	Las Virgenes Municipal Water District	309	Helix Water District
133	Long Beach Water Department	312	Indian Wells Valley Water District
135	Los Angeles County	313	Irvine Ranch Water District

	Waterworks District 29 - Malibu & Marina del Rey		
138	Los Angeles County Waterworks District 40 - Antelope Valley	314	Jurupa Community Services District
139	Los Angeles Dept. of Water and Power	316	Las Virgenes Municipal Water District
140	Marin Municipal Water District	317	Long Beach Water Department
142	Mesa Consolidated Water District	318	Los Angeles Dept. of Water and Power
143	Mid-Peninsula Water District	319	Marin Municipal Water District
144	Monte Vista Water District	321	Mesa Consolidated Water District
145	Montecito Water District	322	Mid-Peninsula Water District
146	Moulton Niguel Water District	323	Monte Vista Water District
147	Newhall County Water District	324	Montecito Water District
148	North Coast County Water District	325	Moulton Niguel Water District
149	North Marin Water District	326	Newhall County Water District
151	Olivenhain Municipal Water District	327	North Coast County Water District
152	Orangevale Water Co.	328	North Marin Water District
153	Otay Water District	330	Olivenhain Municipal Water District
154	Padre Dam Municipal Water District - Retail	331	Orangevale Water Co.
155	Placer County Water Agency - Retail	332	Otay Water District
156	Ramona Municipal Water District	333	Padre Dam Municipal Water District - Retail
157	Rancho California Water District	334	Placer County Water Agency - Retail
158	Rincon Del Diablo Municipal Water District	335	Ramona Municipal Water District
159	Rowland Water District	336	Rancho California Water District
160	Rubidoux Community Services District	337	Rincon Del Diablo Municipal Water District
161	Sacramento County Water Agency - Arden Park Vista	338	Rowland Water District
162	Sacramento County Water Agency - Laguna / Vineyard	339	Rubidoux Community Services District
163	San Antonio Water Company	340	Sacramento County Water Agency - Arden Park Vista
164	San Dieguito Water District	341	Sacramento County Water Agency - Laguna / Vineyard
165	San Francisco PUC - Retail	342	San Antonio Water Company
166	San Juan Water District - Retail	343	San Dieguito Water District
167	Santa Clarita Water Division	344	San Francisco PUC - Retail
168	Santa Fe Irrigation District	345	San Juan Water District - Retail

170	South Coast Water District	346	Santa Clarita Water Division
172	Sweetwater Authority	347	Santa Fe Irrigation District
174	Town of Windsor	349	South Coast Water District
175	Trabuco Canyon Water District	350	Sweetwater Authority
176	Triunfo Sanitation District	352	Town of Windsor
177	Valencia Water Company	353	Trabuco Canyon Water District
178	Valley Center Municipal Water District	354	Triunfo Sanitation District
179	Valley of the Moon Water District	355	Valencia Water Company
180	Ventura County Waterworks Dist. #1	356	Valley Center Municipal Water District
181	Vista Irrigation District	358	Ventura County Waterworks Dist. #1
182	Walnut Valley Water District	359	Vista Irrigation District
184	Western MWD of Riverside County - Retail	360	Walnut Valley Water District
716	Bella Vista WD	361	Western MWD of Riverside County - Retail
717	City of Coalinga	725	Bella Vista WD
720	City of Redding	726	City of Coalinga
722	San Benito County Water District	729	City of Redding
723	Solano/Suisun WA	731	San Benito County Water District
		732	Solano/Suisun WA

Table 4. List of Water Suppliers used in the analysis (2007 and 2008).

Year 2007		Year 2008	
Record ID	Unit Name	Record ID	Unit Name
362	Alameda County Water District	537	Alameda County Water District
363	Atascadero Mutual Water Co.	538	Atascadero Mutual Water Co.
366	California Water Service Company - Bakersfield	541	California Water Service Company - Bakersfield
367	California Water Service Company - Bear Gulch	542	California Water Service Company - Bear Gulch
368	California Water Service Company - Chico District	543	California Water Service Company - Chico District
370	California Water Service Company - Dominguez	545	California Water Service Company - Dominguez
371	California Water Service Company - East Los Angeles	546	California Water Service Company - East Los Angeles
372	California Water Service Company - Hermosa / Redondo	547	California Water Service Company - Hermosa / Redondo
375	California Water Service	550	California Water Service Company - Livermore

	Company - Livermore		
376	California Water Service Company - Los Altos District	551	California Water Service Company - Los Altos District
377	California Water Service Company - Marysville	552	California Water Service Company - Marysville
378	California Water Service Company - Mid-Peninsula	553	California Water Service Company - Mid-Peninsula
379	California Water Service Company - Oroville	554	California Water Service Company - Oroville
380	California Water Service Company - Palos Verdes	555	California Water Service Company - Palos Verdes
382	California Water Service Company - Salinas District	557	California Water Service Company - Salinas District
383	California Water Service Company - Selma	558	California Water Service Company - Selma
384	California Water Service Company - South San Francisco	559	California Water Service Company - South San Francisco
385	California Water Service Company - Stockton	560	California Water Service Company - Stockton
386	California Water Service Company - Visalia	561	California Water Service Company - Visalia
387	California Water Service Company - Westlake	562	California Water Service Company - Westlake
389	Camrosa Water District	564	Camrosa Water District
390	Carlsbad Municipal Water District	565	Carlsbad Municipal Water District
391	Carpinteria Valley Water District	566	Carpinteria Valley Water District
392	Casitas Municipal Water District	567	Casitas Municipal Water District
394	Citrus Heights WD	569	Citrus Heights WD
395	City of Anaheim, PUD	570	City of Anaheim, PUD
396	City of Benicia	571	City of Benicia
397	City of Beverly Hills	572	City of Beverly Hills
398	City of Brentwood	573	City of Brentwood
399	City of Burbank, PSD	574	City of Burbank, PSD
401	City of Camarillo	575	City of Calexico
402	City of Chino	577	City of Camarillo
403	City of Chino Hills	578	City of Chino
404	City of Corona, Water Utilities Department	579	City of Chino Hills
406	City of Davis, Public Works	581	City of Corona, Water Utilities Department
407	City of Downey	583	City of Davis, Public Works
408	City of Escondido	584	City of Downey
409	City of Fairfield, Dept of Public Works	585	City of Escondido
410	City of Folsom	586	City of Fairfield, Dept of Public Works
411	City of Fountain Valley	587	City of Folsom
412	City of Fresno	588	City of Fountain Valley
413	City of Fullerton	589	City of Fullerton
414	City of Garden Grove	590	City of Garden Grove

415	City of Glendale, Public Services Dept.	591	City of Glendale, Public Services Dept.
416	City of Hayward	592	City of Hayward
417	City of Hollister	593	City of Hollister
418	City of Huntington Beach	594	City of Huntington Beach
419	City of La Verne	595	City of La Verne
421	City of Mountain View	597	City of Mountain View
422	City of Napa	598	City of Napa
423	City of Newport Beach	599	City of Newport Beach
424	City of Oceanside, Water Dept	600	City of Oceanside, Water Dept
425	City of Ontario	601	City of Ontario
426	City of Oxnard	602	City of Oxnard
427	City of Palo Alto	603	City of Palo Alto
429	City of Petaluma	605	City of Petaluma
431	City of Pittsburg	607	City of Pittsburg
432	City of Pomona	608	City of Pomona
433	City of Poway	609	City of Poway
434	City of Redwood City	610	City of Redwood City
435	City of Riverside, Public Utilities	611	City of Riverside, Public Utilities
436	City of Rohnert Park	612	City of Rohnert Park
437	City of Roseville	613	City of Roseville
438	City of Sacramento - Retail	614	City of Sacramento - Retail
439	City of San Buenaventura	615	City of San Buenaventura
440	City of San Diego - Retailer	616	City of San Diego - Retailer
441	City of San Fernando	618	City of San Juan Capistrano
442	City of San Juan Capistrano	619	City of San Luis Obispo
443	City of San Luis Obispo	620	City of Sanger
444	City of Santa Barbara, PWD	621	City of Santa Barbara, PWD
445	City of Santa Cruz Water Department	622	City of Santa Cruz Water Department
446	City of Santa Maria	623	City of Santa Maria
447	City of Santa Monica	624	City of Santa Monica
448	City of Santa Rosa	625	City of Santa Rosa
450	City of Upland	627	City of Upland
451	City of Vacaville	628	City of Vacaville
453	Contra Costa WD - Retail	630	Contra Costa WD - Retail
454	Cucamonga Valley Water District	631	Cucamonga Valley Water District
455	Dublin San Ramon Services District	632	Dublin San Ramon Services District
456	East Bay Municipal Utility District (EBMUD)	633	East Bay Municipal Utility District (EBMUD)
457	Eastern Municipal Water District - Retail	634	Eastern Municipal Water District - Retail
458	El Dorado Irrigation District	635	El Dorado Irrigation District
459	El Toro Water District	636	El Toro Water District
460	Elsinore Valley MWD - Retail	637	Elsinore Valley MWD - Retail

461	Fair Oaks Water District	638	Fair Oaks Water District
462	Fallbrook Public Utility District	639	Fallbrook Public Utility District
464	Golden State Water Company - Apple Valley	641	Golden State Water Company - Apple Valley
465	Golden State Water Company - Arden-Cordova	642	Golden State Water Company - Arden-Cordova
466	Golden State Water Company - Barstow	643	Golden State Water Company - Barstow
468	Golden State Water Company - Calipatria	646	Golden State Water Company - Claremont
469	Golden State Water Company - Claremont	649	Golden State Water Company - Metro
472	Golden State Water Company - Metro	652	Golden State Water Company - Orange County
475	Golden State Water Company - Orange County	653	Golden State Water Company - San Dimas
476	Golden State Water Company - San Dimas	654	Golden State Water Company - San Gabriel Valley
477	Golden State Water Company - San Gabriel Valley	655	Golden State Water Company - Santa Maria
478	Golden State Water Company - Santa Maria	658	Goleta Water District
479	Golden State Water Company - Simi Valley	659	Helix Water District
481	Goleta Water District	661	Indian Wells Valley Water District
482	Helix Water District	662	Irvine Ranch Water District
484	Indian Wells Valley Water District	664	Lakeside Water District
485	Irvine Ranch Water District	665	Las Virgenes Municipal Water District
487	Las Virgenes Municipal Water District	666	Long Beach Water Department
488	Long Beach Water Department	668	Los Angeles County Waterworks District 29 - Malibu & Marina del Rey
490	Los Angeles County Waterworks District 29 - Malibu & Marina del Rey	670	Los Angeles County Waterworks District 37 - Acton
492	Los Angeles County Waterworks District 37 - Acton	671	Los Angeles County Waterworks District 40 - Antelope Valley
493	Los Angeles County Waterworks District 40 - Antelope Valley	672	Los Angeles Dept. of Water and Power
494	Los Angeles Dept. of Water and Power	673	Marin Municipal Water District
495	Marin Municipal Water District	674	Marina Coast Water District
496	Marina Coast Water District	675	Mesa Consolidated Water District
497	Mesa Consolidated Water District	676	Mid-Peninsula Water District
498	Mid-Peninsula Water District	677	Monte Vista Water District

499	Monte Vista Water District	678	Montecito Water District
500	Montecito Water District	679	Moulton Niguel Water District
501	Moulton Niguel Water District	680	Newhall County Water District
502	Newhall County Water District	681	North Coast County Water District
503	North Coast County Water District	682	North Marin Water District
504	North Marin Water District	684	Olivenhain Municipal Water District
506	Olivenhain Municipal Water District	685	Orangevale Water Co.
507	Orangevale Water Co.	686	Otay Water District
508	Otay Water District	687	Padre Dam Municipal Water District - Retail
509	Padre Dam Municipal Water District - Retail	688	Placer County Water Agency - Retail
510	Placer County Water Agency - Retail	689	Ramona Municipal Water District
511	Ramona Municipal Water District	690	Rancho California Water District
512	Rancho California Water District	691	Rincon Del Diablo Municipal Water District
513	Rincon Del Diablo Municipal Water District	692	Rowland Water District
514	Rowland Water District	693	Sacramento County Water Agency - Arden Park Vista
515	Sacramento County Water Agency - Arden Park Vista	694	Sacramento County Water Agency - Laguna / Vineyard
516	Sacramento County Water Agency - Laguna / Vineyard	695	San Antonio Water Company
517	San Antonio Water Company	696	San Dieguito Water District
518	San Dieguito Water District	697	San Jose Water Company
519	San Jose Water Company	698	San Juan Water District - Retail
520	San Juan Water District - Retail	699	Santa Fe Irrigation District
521	Santa Fe Irrigation District	700	Santa Ynez River WCD - I.D.#1
524	South Coast Water District	702	South Coast Water District
525	Sweetwater Authority	703	Sweetwater Authority
527	Town of Windsor	705	Town of Windsor
528	Trabuco Canyon Water District	706	Trabuco Canyon Water District
529	Triunfo Sanitation District	707	Triunfo Sanitation District
530	Valencia Water Company	708	Valencia Water Company
531	Valley Center Municipal Water District	709	Vallecitos Water District
532	Valley of the Moon Water District	710	Valley Center Municipal Water District
533	Ventura County Waterworks Dist. #1	711	Valley of the Moon Water District
534	Vista Irrigation District	712	Ventura County Waterworks Dist. #1
535	Walnut Valley Water District	713	Vista Irrigation District
536	Yucaipa Valley Water District	714	Walnut Valley Water District
734	Bella Vista WD	715	Yucaipa Valley Water District

736	City of Tracy	741	Bella Vista WD
738	San Benito County Water District	744	City of Tracy
739	Solano/Suisun WA	745	City of Vallejo