

- **Board of Directors**
Water Quality and Operations Committee

December 9, 2008 Board Meeting

7-5

Subject

Revise Metropolitan Water District Administrative Code Section 4503 to define member agency responsibilities to accommodate outages at new and modified service connections on raw water conveyance facilities

Description

This action defines member agency responsibilities to accommodate Metropolitan outages at new and modified service connections on raw water conveyance facilities. This action was recommended by the Integrated Area Study (IAS) participants and was included as an action item in the IAS Final Report that was presented to the Board in December 2007. Specifically, this action increases member agency responsibility for accommodating outages at new and modified service connections on raw water conveyance facilities from 7 days up to a maximum of 21 days, depending upon the specific water conveyance facility. This change is necessary because increasingly stringent environmental regulations have greatly extended the time required to dewater long, large diameter pipelines, which are aging and require more frequent maintenance than in the past. Member agency responsibility for accommodating outages for service connections on the raw and treated water distribution systems remains unchanged at 7 days.

The recommended update to Metropolitan's Administrative Code Section 4503 "Suspension of Deliveries" differentiates between the increased outage provisions proposed for the raw water conveyance system and provisions currently required for the raw and treated water distribution systems. Staff and the IAS participants recommend that these changes be incorporated into all Metropolitan/member agency agreements for the construction of new or modified service connections on raw water conveyance facilities. Metropolitan will not seek to amend existing service connection agreements for the sole purpose of incorporating these changes.

Background

Metropolitan has three primary water delivery systems: a raw water conveyance system, a raw water distribution system, and a treated water distribution system. Raw water conveyance facilities were designed and constructed to deliver water to Metropolitan's reservoirs and water treatment plants, but not to serve as distribution feeders with service connections. The raw water distribution system is limited to a few pipelines in the Skinner area that can be operated as either untreated or treated water distribution lines. The treated water distribution system was designed to deliver water from the regional water treatment plants to Metropolitan's member agencies. Metropolitan's raw water conveyance facilities differ significantly from the raw and treated water distribution systems in that they have limited isolation capabilities and are not interconnected. This makes shutdowns more challenging for raw water conveyance facilities.

Although Metropolitan's raw water conveyance facilities were not designed and constructed to serve as distribution feeders, their purpose has evolved over time. Once development adjacent to these feeders began to occur, it was natural for local agencies to request water deliveries from them. Historically, Metropolitan has allowed new service connections on raw water conveyance facilities as requested by member agencies. This practice was discussed in the IAS subgroup, which explored alternative approaches to meeting future demands and addressed emerging policy questions. The IAS participants were concerned that local constraints on outage durations could negatively impact Metropolitan's ability to assure long-term reliability of these facilities. In particular, it was noted that high member agency dependence upon a few service connections on a single raw water conveyance pipeline recently made it difficult to schedule an emergency outage of adequate duration to make repairs.

To further complicate the issue, a number of factors have increased the necessary duration of planned outages on raw water conveyance facilities. These include environmental restrictions that increase the time to dewater these long pipelines, and aging facilities that require more frequent maintenance. With these changing conditions, the durations of outages for large conveyance facilities often extend well beyond 7 days. Metropolitan's Administrative Code Section 4503 defines member agency responsibilities for accommodating planned and unplanned outages on Metropolitan's facilities. Currently, it does not differentiate between responsibilities for accommodating outages on conveyance and distribution water systems. This section was last modified in November 2004 and states, "Each member agency shall have sufficient resources such as local reservoir storage, groundwater production capacity, system interconnections, or alternate supply source to sustain a 7-day interruption in Metropolitan deliveries based on annual average demands." Although this 7-day requirement is still considered sufficient for outages on the raw and treated water distribution systems, it is no longer adequate to accommodate the more extended duration outages now required for the majority of Metropolitan's raw water conveyance facilities.

The IAS workgroup agreed that the 7-day outage provision in Metropolitan's Administrative Code was inadequate for raw water conveyance facilities and that it would be better to use a facility-specific number, estimated by Metropolitan's Water System Operations Group to vary between 7 and 21 days. It was also agreed that the formal service connection request, review and agreement preparation process should be used to assure and document that local capabilities are adequate to meet the facility-specific outage requirements. In addition, this process will be used to assure that the long-term operational flexibility of the regional system is maintained by documenting the member agency responsibility to accommodate future changes in outage duration, treatment requirements and grade.

This action revises Administrative Code Section 4503 to define member agency responsibilities to accommodate outages at new and modified service connections on raw water conveyance facilities. The changes will become effective January 1, 2009. This action is consistent with Metropolitan's goal for ensuring system reliability by providing the ability to schedule outages as needed to inspect and repair raw water conveyance facilities. See [Attachment 1](#) for a diagram of all existing raw water conveyance system service connections, and [Attachment 2](#) for the proposed revisions to Administrative Code Section 4503: Suspension of Deliveries.

Policy

Metropolitan Water District Administrative Code Section 4503: Suspension of Deliveries

California Environmental Quality Act (CEQA)

CEQA determination for Option #1:

The proposed actions are not defined as a project under CEQA because they involve continuing administrative activities, such as general policy and procedure making (Section 15378(b)(2) of the State CEQA Guidelines). In addition, where it can be seen with certainty that there is no possibility that the proposed actions in question may have a significant effect on the environment, the proposed actions are not subject to CEQA (Section 15061(b)(3) of the State CEQA Guidelines). Prior to formal approval of new service connections and pipeline operating agreements, environmental documentation will be prepared by the CEQA lead agency and processed in accordance with CEQA and the State CEQA Guidelines. As the responsible agency, Metropolitan will then review and consider the environmental documentation prior to taking further actions.

The CEQA determination is: Determine that the proposed actions are not subject to CEQA pursuant to Sections 15378(b)(2) and 15061(b)(3) of the State CEQA Guidelines.

CEQA determination for Option #2:

None required

Board Options

Option #1

Adopt the CEQA determination and

- a. Revise Metropolitan’s Administrative Code Section 4503 “Suspension of Deliveries” (per **Attachment 2**) to differentiate between the outage provisions proposed for the raw water conveyance system (between 7 and 21 days) and those currently required for raw and treated water distribution systems (7 days), as recommended by the IAS workgroup; and
- b. Incorporate the revised Administrative Code requirements into all new and revised service connection agreements pertaining to raw water conveyance facilities.

Fiscal Impact: None

Business Analysis: There will be no financial impact to member agencies for the existing service connections. At the same time, the more clearly defined member agency responsibilities for service connections on the raw water conveyance system will help Metropolitan assure the long-term reliability of these facilities by avoiding locally imposed constraints on outage durations.

Option #2

Do not revise Metropolitan’s Administrative Code.

Fiscal Impact: There will be no near-term fiscal impact but a significant, long-term fiscal impact will occur to Metropolitan’s operations and maintenance (O&M) activities if the Administrative Code is not revised to reflect the actual conditions on the raw water conveyance system. The current member agency requirement for having sufficient resources to withstand a 7-day interruption in deliveries on the raw water conveyance facilities is inadequate to allow for routine O&M activities that are necessary to assure long-term reliability of these facilities. If routine O&M activities cannot be performed, the potential for unplanned emergency outages and costly repairs will increase.

Business Analysis: Significant, long-term financial impacts are anticipated with the continuation of the existing policy of granting new service connections on raw water conveyance facilities without consideration of how local constraints can prevent Metropolitan from assuring the long-term reliability of these facilities.

Staff Recommendation

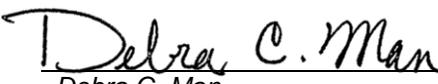
Option #1



 James F. Green
 Manager, Water System Operations

11/4/2008

 Date



 Debra C. Man
 for Jeffrey Kightlinger
 General Manager

11/20/2008

 Date

Attachment 1 – Existing Service Connections on Raw Water Conveyance Facilities

Attachment 2 – Proposed Revisions to Administrative Code Section 4503



§ 4503. Suspension of Deliveries.

(a) Whenever repairs or maintenance of the District's system, in the opinion of the General Manager of the District, shall require suspension of delivery of water at any point or points, such delivery may be suspended without liability on the part of the District; provided, that except in cases of emergency, as determined by the General Manager, notice of such suspension of service shall be given to the affected member public agency in advance of such suspension. Metropolitan will make a concerted effort to notify and work with member public agencies regarding all scheduled interruptions. The District will schedule non-emergency interruptions for the low demand months of the year, typically October through April, in coordination with the member public agencies.

(b) Each member agency shall have sufficient resources such as local reservoir storage, groundwater production capacity, system interconnections or alternate supply source to sustain:

(1) A seven-day interruption in Metropolitan deliveries from raw and treated water distribution facilities based on average annual demands of the affected facility.

(2) For service connections installed or modified after December 31, 2008 on raw water conveyance facilities, a seven- to twenty-one-day interruption in Metropolitan raw water deliveries based on average annual demand of the affected facility.

If a member public agency has been provided with a sixty (60) day notice of when an interruption in service is to occur, the member public agency shall be responsible for and reimburse direct costs, excluding labor costs, incurred by Metropolitan in the event that a scheduled non-emergency interruption ~~of up to seven days~~ is postponed or cancelled at the request of the member public agency as a result of insufficient local resources, and the District agrees to such cancellation or postponement. Direct costs shall be determined by Metropolitan's General Manager, in consultation with the affected member agency. These direct costs shall be applied to the member public agency's water invoice following cancellation or postponement of the shutdown.

(c) Except in cases of emergency, the District, working with the member agencies, will produce a shutdown schedule each September for the annual shutdown season from October through April. The District will also develop a three-year shutdown schedule, which will give notice of the proposed shutdowns greater than seven days at least one-year in advance.

(d) Replenishment Service certifications will be adjusted for the reduction of credits that are accrued due to shutdowns that are greater than seven days. No adjustments will be made for shutdowns seven days or less unless the member agency provides a service to the District by serving another member agency in-lieu of District deliveries during a shutdown even if the shutdown is seven days or less.