

Guidelines for Requesting Modification Of Baseline Amount Assigned to Firm Water Customers For Pro Rata Curtailment April 2024

In the event LCRA enters pro rata curtailment, customers would be required to use at least 20% less water than used during the reference year of June 2022-May 2023. LCRA will provide each customer with its use during the baseline year (called baseline amount) and allotted amount for use during curtailment prior to entering pro rata.

A customer's baseline amount may be adjusted if demand in the reference year is not reflective of the customer's current reasonable demand because:

- 1. Implementation of water conservation and/or drought management measures reduced water use in the reference year.
- 2. New growth has resulted in an increase in demands since the reference year.
- 3. A plant outage or other incident reduced water use in the reference year.
- 4. The customer did not receive LCRA-supplied water for the entire reference year.
- 5. The customer implemented a specific action or program that resulted in a reduction of water use in the reference year.

See rule 1.5.a of the <u>Pro Rata Curtailment Rules for Water Use by Firm Water</u> Customers for more information.

Any customers requesting a modification to its baseline amount must supply supporting documentation consistent with the following guidelines:

- 1. For water savings as a result of water conservation and/or drought management measures:
 - a. Savings must have occurred during the reference year of June 2022-May 2023. The water savings from that period will be added to the reference year use to represent the total demand if the water savings measures had not been in place. Cumulative savings since a water-saving program was initiated are not applicable.
 - Water savings resulting from implementation of a permanent maximum twice-weekly watering schedule as required in LCRA's Water Conservation Plan rules is considered a baseline water conservation measure and will not be considered as a reason for a modification.
 - ii. Water savings resulting from implementation of a once weekly watering schedule in place permanently or as a drought response measure during the reference year period qualifies as a basis for a modification request.
 - iii. The requested modification must represent no less than 2% of the customer's total use during the reference year.

- Evaluations/studies conducted to demonstrate water savings from implementing one or several water conservation measures must comply with the following:
 - If the measure is a permanent equipment or process change and estimated savings have been documented by acceptable studies, a statistical study is not needed.
 - ii. If the measure is not a permanent equipment or process change, the savings must be demonstrated by an analysis consistent with industry-standard econometric, statistical methodology that controls for statistical measurement issues that might arise from factors such as sample size, relationships between multiple variables and model specification. The analysis also must be normalized for weather, including rain and temperature.
 - iii. Qualifying water savings measures are limited to programs implemented in the past 10 years. This does not apply to reuse projects that offset demand for LCRA-contracted water during the reference year.
- c. Documentation must be provided demonstrating that a conservation program/measure was implemented.
- 2. For a new customer (regardless of use type) that did not use water for the entire reference year or a customer that had a change in demand during the year:
 - a. Documentation may include any appropriate data extrapolated to a 12-month period, including an appropriate seasonal distribution.
- 3. For municipal customers that have experienced demand growth since the reference year:
 - a. Documentation must include data such as Living Unit Equivalents (LUEs) or number of connections, and gallons per capita per day (GPCD).
 - i. If using the current LUEs versus the number of LUEs in the reference year, the unit equivalent must be defined.
 - ii. If using number of connections, provide connections for each type of use.
 - iii. For GPCD, the population must be derived from the 2020 census and based on a person per household (pphh) served by the customer. The GPCD assumed for demand growth must not exceed 200.
 - b. The requested modification must represent no less than 2% of the customer's total use during the reference year.
- 4. Include any other appropriate information that demonstrates the baseline amount should be adjusted.

See rule 1.5.c of the <u>Pro Rata Curtailment Rules for Water Use by Firm Water</u> Customers for more information.