

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



September 14, 2023

Kiki Carlson
Regulatory Affairs Manager
Suburban Water Systems
1325 N. Grand Ave., Ste. 100
Covina, CA 91724-4044

Dear Ms. Carlson,

The Water Division of the California Public Utilities Commission has approved Suburban Water Systems' Advice Letter No. 394, filed on July 13, 2023, regarding establishing a Lead and Copper Rule Revisions Memorandum Account.

Enclosed are copies of the following revised tariff sheets, effective July 13, 2023, for the utility's files:

P.U.C. Sheet

No.	Title of Sheet
1941-W	Preliminary Statement Lead and Copper Rule Revisions Memorandum Account, Part AE
1942-W	Preliminary Statement Lead and Copper Rule Revisions Memorandum Account, Part AE (continued)
1943-W	Table of Contents

Please contact Alison Pafford at APF@cpuc.ca.gov or 415-417-7615, if you have any questions.

Thank you.

Enclosures

Suburban Water Systems
1325 N. Grand Ave., Ste. 100
Covina, CA 91724-4044

Original

Cal. P.U.C. Sheet No. 1941-W

Cal. P.U.C. Sheet No.

PRELIMINARY STATEMENT

(Continued)

AE. Lead And Copper Rule Revisions Memorandum Account

(N)

1. PURPOSE:

The purpose of the LCRRMA is to track and recover any incremental expenses and carrying costs on capital investments incurred by Suburban Water Systems (SWS) that are required to comply with the United States Environmental Protection Agency's (EPA) Lead and Copper Rule Revisions (LCRR) that are not otherwise covered in SWS's authorized rates.

2. APPLICABILITY:

SWS expects to incur expenses related to the initial comprehensive study of service line materials that include incremental operations and maintenance (O&M) costs, and carrying costs on capital investments that may be required. Costs may include but are not limited to the following:

- a. Development of service line material inventories for each of SWS' water systems;
- b. Preparation of Lead Service Line Replacement (LSLR) Plans for each system;
- c. Replacement of service lines (if necessary);
- d. Preparation of a Standard Operating Procedure (SOP) for the development and ongoing maintenance of the customer service line inventories;
- e. Development of sampling plans for lead and copper compliance monitoring at the taps of customers, daycares and schools for each system;
- f. Development of school and child care facility inventories for all SWS' systems, and preparation for and the cost of sampling in these facilities; and
- g. Preparation of messaging for public education and customer notifications.

3. ACCOUNTING PROCEDURE:

The LCRRMA does not have a rate component.

- a. A debit entry shall be made to the LCRRMA to record all related costs including, but not limited to, developing of service line material inventories, lead and copper sampling plans/monitoring at the taps of private customers, daycares and schools/preparation of lead Service Line Replacement plans/public messaging, education and customer notifications.

(N)

(Continued)

(To be inserted by utility)

Issued by

(To be inserted by Cal. P.U.C.)

Advice Letter No. 394-W

Craig D. Gott

Date Filed 07/13/2023

Decision No.

Name
President
Title

Effective 07/13/2023

Resolution No.

Suburban Water Systems
1325 N. Grand Ave., Ste. 100
Covina, CA 91724-4044

Original

Cal. P.U.C. Sheet No. 1942-W

Cal. P.U.C. Sheet No.

PRELIMINARY STATEMENT

(Continued)

AE. Lead And Copper Rule Revisions Memorandum Account (Continued)

(N)

- b. Interest shall accrue to the LCRRMA on a monthly basis by applying a rate equal to one- twelfth of the 3-month Commercial Paper Rate, as reported in the Federal Reserve Statistical Release, to the average of the beginning-of-month and end-of balances.
- c. A debit entry equal to the revenue requirement of each capital expenditure at SWS' authorized rate of return and related expenses (including return, income taxes, ad valorem tax, depreciation, and other taxes and fees).
- d. A credit entry to transfer all or portion of the balance in the LCRRMA to other adjustment clauses for future rate recovery, as may be approved by the CPUC.

4. EFFECTIVE DATE:

The LCRRMA shall go into effect on the filing date of Advice Letter No. 394-W.

5. DISPOSITION:

Disposition of amounts recorded in the LCRRMA shall be determined in SWS' next General Rate Case.

(N)

(To be inserted by utility)

Issued by

(To be inserted by Cal. P.U.C.)

Advice Letter No. 394-W

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Suburban Water Systems
1325 N. Grand Ave., Ste. 100
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Revised
Canceling Revised

Cal. P.U.C. Sheet No. 1943-W
Cal. P.U.C. Sheet No. 1939-W

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Advice Letter No. 394-W

Craig D. Gott

Date Filed 07/13/2023

Decision No. _____

Name

President

Effective 07/13/2023

Title

Resolution No. _____

**CALIFORNIA PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS**

Advice Letter Cover Sheet

Utility Name: Suburban Water Systems **Date Mailed to Service List:** July 13, 2023
District: n/a
CPUC Utility #: U – 339-W **Protest Deadline (20th Day):** August 2, 2023
Advice Letter #: 394-W **Review Deadline (30th Day):** August 14, 2023
Tier: ☐ ☒ ☐ ☐
 1 2 3 Compliance **Requested Effective Date:** July 13, 2023
Authorization: **Rate Impact:** n/a
Description: Establish a Lead and Copper Rule Revisions
Memorandum Account

The protest or response deadline for this advice letter is 20 days from the date that this advice letter was mailed to the service list. Please see the "Response or Protest" section in the advice letter for more information.

Utility Contact: Kiki Carlson

Phone: (626) 543-2553

Email: kcarlson@swwc.com

Utility Contact: Carmelitha Bordelon

Phone: (626) 543-2547

Email: cbordelon@swwc.com

DWA Contact: Tariff Unit

Phone: (415) 703-1133

Email: Water.Division@cpuc.ca.gov

DWA USE ONLY

DATE

STAFF

COMMENTS

[] APPROVED

[] WITHDRAWN

[] REJECTED

Signature: _____

Comments: _____

Date: _____



1325 N. Grand Ave. Ste. 100, Covina, CA 91724-4044
Phone: 626.543.2500, Fax: 626.331.4848
www.swwc.com

U-339-W

VIA EMAIL

ADVICE LETTER NO. 394-W

July 13, 2023

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Suburban Water Systems ("Suburban") hereby transmits for filing the following changes in its tariff schedules applicable to its service area and which are attached hereto:

CPUC Sheet No.	Title of Sheet	Canceling CPUC Sheet No.
1941-W – 1942-W	Preliminary Statement Lead and Copper Rule Revisions Memorandum Account, Part AE	n/a
1943-W	Table of Contents	1939-W

Purpose

Suburban is seeking authorization to establish a Lead and Copper Rule Revisions Memorandum Account (LCRRMA) to track incremental costs required to comply with the United States Environmental Protection Agency (EPA) Lead and Copper Rule Revisions (LCRR) that are not otherwise covered in Suburban's authorized rates.

In an effort to comply with the updated LCRR and the anticipated January 1, 2024 approval date of the LCRRMA in its GRC, Suburban met with the Division of Drinking Water (DDW) on June 28, 2023 to discuss Suburban's proposed sampling method. DDW stated they were unable to provide direction until they had reviewed Suburban's initial study which would be a roadmap for compliance with the new requirements. DDW's process for reviewing the study prior to providing direction adds additional time to Suburban's schedule and places additional impetus for Suburban to start work as soon as possible to meet the October 16, 2024 deadline.

Because of the time needed to comply with the LCRR requirements, and with the condition that this advice letter is approved, Suburban is requesting authorization to withdraw its Special Request No. 15 (Request for Lead and Copper Rule Revision Memorandum Account) which is included in Suburban's current General Rate Case Application (A.) 23-01-001.

Background

On January 15, 2021, the EPA issued the revised LCRR. This regulation introduces several new compliance and reporting requirements for water systems in the United States, some of which must be completed by October 16, 2024.

The EPA's revised LCRR is to protect consumers from the impact of lead exposure in drinking water. Under the LCRR, the EPA requires water systems to conduct a comprehensive inventory of both utility-owned and customer-owned service line materials. The LCRR will require Suburban to identify any portion of a service line and categorize its findings as either lead, galvanized, non-lead (including copper, plastic or steel), or lead status-unknown service lines

and lines requiring replacement. SWS will also be required to make the inventory information available publicly.

On December 16, 2021, the EPA published Docket No. EPA-HW-OW-2021-0255 in the federal register. Within the Docket, EPA committed to propose and further revise the LCRR by October 2024 with the Lead and Copper Rule Improvements (LCRI). The LCRI are expected to delay the implementation of portions of the LCRR beyond the original October 16, 2024, compliance date with the exception of the service line material inventory requirements. The LCRI may include additional modifications and requirements to the following LCRR sections:

- Timely replacement of lead service lines
- Revised tap sampling and lead action/trigger levels
- School and Child Care Center sampling
- Public education
- Corrosion control treatment

Memorandum Account Justification

The EPA requires public and private water systems to comply with the update of the LCRR. Suburban will need to include all of its six water systems for the LCRR, focusing on the regulatory requirements that are due by the compliance date. Suburban anticipates incurring substantial costs in order to comply with the revisions. The LCRR will require a comprehensive inventory of service line materials, which requires researching and documenting state and local plumbing codes, permits and existing records or other available historic records that indicate service line materials.

Suburban is requesting to establish a Lead And Copper Rule Revisions Memorandum Account (LCRRMA), to record costs associated with the LCRR for the initial extensive study for service line material inventories and any incremental O&M expenses and carrying costs on any capital investments incurred for any additional modifications and requirements that may result from the final LCRI. Only costs that are not otherwise covered in Suburban's revenue requirement would be tracked in the memorandum account.

The substantial costs Suburban expects to incur include the initial comprehensive study of service line materials. This effort alone will entail, but not be limited to, the following components:

- Development of service line material inventories for each of SWS' water systems;
- Preparation of Lead Service Line Replacement (LSLR) Plans for each system;
- Replacement of lines (if necessary);
- Prepare a Standard Operating Procedure (SOP) for development, and for ongoing maintenance, of the customer service line inventory;
- Development of sampling plans for lead and copper compliance monitoring at the taps of customers, daycares and schools for each system and replacement of lines (if necessary);
- Development of school and childcare facility inventories for all of Suburban's systems, and preparation for sampling in these facilities and the cost of sampling; and
- Preparation of messaging for public education and customer notifications.

SWS anticipates it will incur estimated costs of \$500,000 for consulting services to prepare the initial study for the service line material inventories for each of its water systems for the LCRR, focusing on the regulatory requirements that are due by October 2024. SWS anticipates it will incur additional substantial costs associated with full compliance of the LCRR due to the

comprehensive, evolving scope of the revisions.

The EPA is expected to issue further improvements to the LCRR which are expected to delay the implementation of portions of the LCRR beyond the original October 2024 compliance date. The EPA is in the process of defining and establishing grant funding options for disadvantaged communities and qualifying utilities in California. Suburban may pursue grant funding options for cost associated with the LCRR, if available.

Request To Establish a Memorandum Account

In accordance with the Commission's Standard Practice U-27-W, establishing a memorandum account is conditional and in consideration with the following criteria which have been met by SWS:

1. The event is not under the utility's control.

On January 2021, the EPA issued a revised LCRR to protect consumers from the impact of lead exposure in drinking water. Under the LCRR, the EPA requires water systems to conduct a comprehensive inventory of both utility owned and customer owned service line materials. The LCRR requires water systems to identify any lead and galvanized lines requiring replacement, or lead status-unknown service lines. The water system is required to make the inventory information available publicly. The EPA is not under Suburban's control, the requirement to comply with the revisions will result in new, unavoidable expenses for Suburban, both exceptional in nature and not under Suburban control.

2. The event could not have been reasonably foreseen in the utility's last general rate case.

The EPA's revisions to the LCRR were issued in January 2021. On December 16, 2021, the EPA published Docket No. EPA-HW-OW-2021-0255 in the federal register. Within the Docket, EPA committed to propose and revise the LCRR by October 2024 with the Lead and Copper Rule Improvements (LCRI). The LCRI are expected to delay the implementation of portions of the LCRR beyond the original October 16, 2024, compliance date with the exception of the service line material inventory requirements. The EPA docket was published after the last general rate case (A.20-03-001) was filed on March 2, 2020. Therefore, the 2023 expenses could not have been reasonably foreseen in Suburban's last general rate case.

3. The event occurred before the utility's next scheduled rate case.

Suburban filed its current general rate case application A.23-01-001 on January 3, 2023, for Years 2024-2026. Suburban included Special Request No. 15 (Request for Lead and Copper Rule Revision Memorandum Account) in its application. However, Suburban has become aware that the scope of work involved is greater than originally anticipated and consequently projected costs will need to begin to be incurred earlier than originally anticipated, before the start of Test Year 2024. Conditioned upon approval of this advice letter, Suburban proposes to withdraw its Special Request No. 15.

4. The event is of a substantial nature in that the amount of money involved is worth the effort of processing a memo account.

Suburban anticipates incurring estimated costs of \$500,000 in order to initiate the service line inventory requirement in compliance with the LCRR revisions required by the EPA by October 2024. SWS anticipates additional substantial costs will be incurred once the EPA issues the LCRI which are expected to delay the implementation of portions of the LCRR beyond the original due date of October 2024.

The LCRI may include additional modifications and requirements to the following LCRR sections:

- Field verification of lead service line inventory
- Timely replacement of lead service lines
- Revised tap sampling and lead action/trigger levels
- School and Child Care Center sampling
- Public education
- Corrosion control study and treatment

The total magnitude of costs associated with full compliance of the LCRR will undoubtedly increase due to the comprehensive, evolving scope of the rule's revisions.

5. The Memorandum Account has ratepayer benefits.

Suburban's customers will benefit from the establishment of this Memorandum Account because it will allow Suburban to adequately prepare all of its water systems for compliance with the updated LCRR requirements. The revisions will concentrate on inventory of lead service lines; developing sampling plans for lead and copper compliance at customers' taps; developing of school and childcare facility inventories and sampling at these facilities; and preparing messaging for public education and customer notifications. Compliance with the regulatory requirements of the EPA's LCRR for its water systems protects consumers from the risks and impact of lead and copper exposure in drinking water.

Memorandum Account Treatment

Suburban is aware that a memorandum account is not a guarantee of eventual recovery of expenses, nor is it carried as a regular account under the uniform system of accounts for water utilities. It is carried "off the books", as a memorandum account. Furthermore, it is also known that Commission policy on memorandum account treatment has always been that the burden of proof of the reasonableness of expenses charged to the account is the responsibility of the utility requesting reimbursement of such costs.

Additional Authority for Requested Memorandum Account

Pursuant to Water Industry Rule 7.3.2. (7) and Rule 8.2, Request for Similar Treatment, Suburban submits this Advice Letter requesting approval as the Commission approved identical (in nature) LCRRMA requests for Golden State Water Company via Advice Letter 1894, San Jose Water Company via Advice Letter 595, and for Great Oaks Water Company pursuant to D.23-04-004.

Tier Designation and Effective Date

This advice letter is submitted with a Tier two designation in accordance with Water Industry Rule 7.3.2.(5) pursuant to General Order 96-B. Suburban is requesting that this filing become effective July 13, 2023, on the filing date of the advice letter.

Customer Notice

This advice letter requests the establishment of a memorandum account only, there are no rate changes being requested, therefore, a customer notice is not required.

Protest and Responses

Anyone may respond to or protest this advice letter. A response supports the filing and may contain information that proves useful to the Commission in evaluating the advice letter. A protest objects to the advice letter in whole or in part and must set forth the specific grounds on which it is based. These grounds are:

A protest objects to the advice letter in whole or in part and must set forth the specific grounds on which it is based. These grounds are:

- (1) The utility did not properly serve or give notice of the advice letter;
- (2) The relief requested in the advice letter would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
- (3) The analysis, calculations, or data in the advice letter contain material error or omissions;
- (4) The relief requested in the advice letter is pending before the Commission in a formal proceeding; or
- (5) The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or
- (6) The relief requested in the advice letter is unjust, unreasonable, or discriminatory (provided that such a protest may not be made where it would require relitigating a prior order of the Commission.)

A protest shall provide citations or proofs where available to allow staff to properly consider the protest.

A response or protest must be made in writing or by electronic mail and must be received by the Water Division within 20 days of the date this advice letter is filed. The address for mailing or delivering a protest is:

Tariff Unit, Water Division, 3rd floor
California Public Utilities Commission,
505 Van Ness Avenue, San Francisco, CA 94102
Water.Division@cpuc.ca.gov

On the same date any protest or response is submitted to the Water Division, the respondent or protestant must serve a copy of the protest or response to:

Suburban Water Systems, Kiki Carlson, Regulatory Affairs Manager, 1325 N. Grand Ave., Suite 100, Covina, CA 91724-4044, and email to kcarlson@swwc.com

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform the Water Division, within the 20 days protest period, so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.

Replies: The utility shall reply to each protest and may reply to any response. Each reply must be received by the Division of Water and Audits within five business days after the end of the protest period and shall be served on the same day to the person who filed the protest or response.

This filing will not cause the withdrawal of service, nor conflict with other schedules or rules.

In compliance with General Rule 4.3 and 7.2 and Water Industry Rule 4.1 of General Order 96-B, a copy of this advice letter has been mailed or electronically transmitted to all interested and affected parties as detailed in Attachment B.

Sincerely,

/s/Carmelitha Bordelon

Carmelitha Bordelon

Director of Regulatory Affairs

Enclosures

Suburban Water Systems
1325 N. Grand Ave., Ste. 100
Covina, CA 91724-4044

Original

Cal. P.U.C. Sheet No. 1941-W

Cal. P.U.C. Sheet No.

PRELIMINARY STATEMENT

(Continued)

AE. Lead And Copper Rule Revisions Memorandum Account

(N)

1. PURPOSE:

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- f. Development of school and child care facility inventories for all SWS' systems, and preparation for and the cost of sampling in these facilities; and
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3. ACCOUNTING PROCEDURE:

The LCRRMA does not have a rate component.

- a. A debit entry shall be made to the LCRRMA to record all related costs including, but not limited to, developing of service line material inventories, lead and copper sampling plans/monitoring at the taps of private customers, daycares and schools/preparation of lead Service Line Replacement plans/public messaging, education and customer notifications.

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(To be inserted by utility)

Issued by

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Advice Letter No. 394-W

Craig D. Gott

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4. EFFECTIVE DATE:

The LCRRMA shall go into effect on the filing date of Advice Letter No. 394-W.

5. DISPOSITION:

Disposition of amounts recorded in the LCRRMA shall be determined in SWS' next General Rate Case.

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Advice Letter No. 394-W

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President

Effective

Title

Resolution No.



Fact Sheet

USEPA Lead and Copper Rule Revisions

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Parts 141 and 142

[EPA-HQ-OW-2017-0300; FRL-10019-23-OW] RIN 2040-AF15

National Primary Drinking Water

Regulations: Lead and Copper Rule Revisions:

<https://www.epa.gov/ground-water-and-drinking-water/final-revisions-lead-and-copper-rule>

Published on January 15, 2021, U.S. Environmental Protection Agency (EPA) finalized the first major update to the Lead and Copper Rule (LCR or Rule) in nearly 30 years. EPA's new Lead and Copper Rule Revisions (LCRR) strengthen every aspect of the LCR to better protect communities and children in elementary schools and childcare facilities from the risks of lead exposure. The new Rule will get the lead out of our nation's drinking water and empower communities through information. Over the next three years, the LCRR will require community and non-transient non-community water systems throughout the United States to conduct an inventory of service lines and determine the material of those lines and fittings. The majority of the LCRR requirements are currently scheduled to go into effect January 2024. The LCRR is scheduled to become effective on June 17, 2021, however the EPA is proposing to delay implementation until December 16, 2021. The public comment period for the LCRR ended on April 12, 2021 and EPA is now determining whether to extend the effective and compliance dates.

Background

In California, **Senate Bill 1398** (2016) and subsequent additions in **Senate Bill 427** (2017), updated the California Health and Safety Code to require only community water systems to conduct an inventory of lead user service lines by July 1, 2018 and submit the user service line data to the State Water Board. As demonstrated in the diagram below, the California definition of a "user service line" is the portion of the service line and fittings that are owned by the water system, from the water main to the meter. In most cases, the homeowner owns the portion of the service line that extends from the water meter to the building inlet.

In contrast to the California definition, the **LCRR define** "service line" as a pipe, including the water meter, which connects the water main to the building inlet. A service line may be owned by the water system, owned by the property owner, or both. The LCRR require all community and non-transient non-community water systems to complete an inventory of service lines, regardless of ownership, by January 16, 2024¹. Under the LCRR, water systems will need to determine if any portion of the service line and its fitting are: lead, galvanized, non-lead, or lead status unknown. A water system may want to collect more specific data on the type of material, such as copper, plastic, or steel.

¹ If the EPA extends the LCRR effective date to December 16, 2021, then it will likely extend the inventory compliance deadline to September 16, 2024.

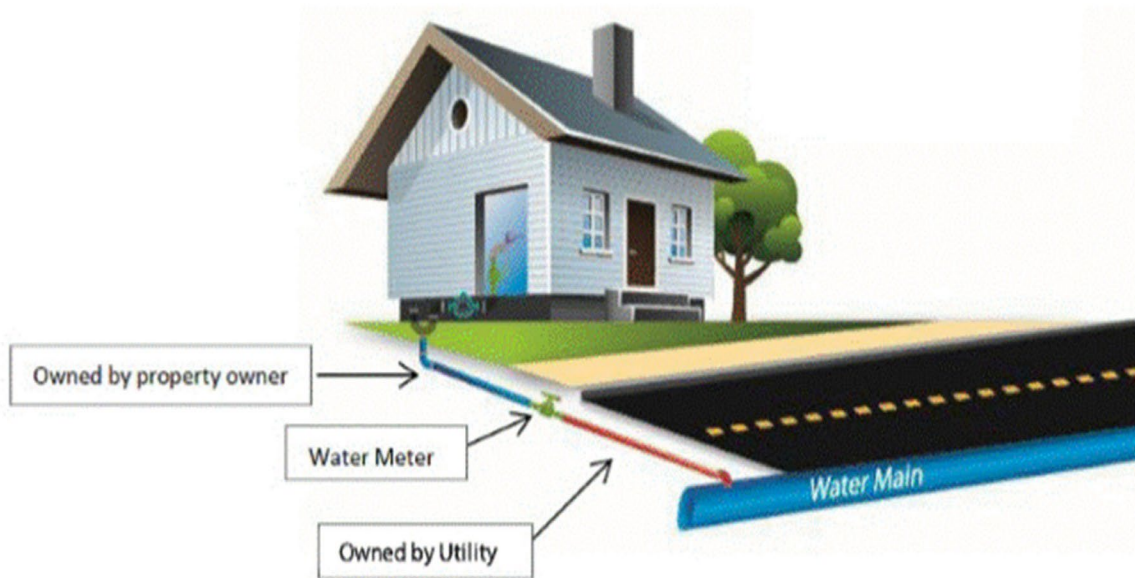


C A L I F O R N I A E N V I R O N M E N T A L P R O T E C T I O N A G E N C Y

S T A T E W A T E R R E S O U R C E S C O N T R O L B O A R D

1001 I Street, Sacramento, CA 95814 • Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 • www.waterboards.ca.gov





NOTE: Under SB 427 and previous California regulations, the sections of the service line titled “*Owned by Utility*” and the “*Water Meter*” are included in California’s definition of a “*service line*.” The EPA’s new LCRR expands the definition of “*service line*” to also include “*Owned by property owner*” such that the entire line, regardless of ownership, is required to be included in a water system’s inventory.

Community water systems in California have already submitted service line inventories that include the portions of the service line from the Water Main to the Water Meter. The State Water Board intends to start collecting the additional data for the remainder of the entire “*serviceline*,” as defined by the LCRR, in the electronic annual report. Under the EPA’s LCRR, community water systems in California **will need to inventory the privately-owned portion (“Owned by property owner”) of the service line over the next three years**. Though the EPA is still currently taking public comment on its LCRR, and revisions may still happen to the LCR, its requirements regarding inventories will likely remain unchanged. California will update its regulations on required inventories so that they are consistent with the LCRR.

Moving Forward

Next Steps for water systems:

The LCRR specifically provides the following requirements to water systems to create an inventory:

A water system must use any information on lead and galvanized iron or steel that it has identified when conducting the inventory of service lines in its distribution system. The water system service line material must be categorized with the following: lead, galvanized, non-lead (including copper, plastic, or steel) or lead status unknown.

The water system must also review the sources of information listed below to identify service line materials for the inventory. The water system may use other sources of information not listed below, if approved by the State.

- All construction and plumbing codes, permits, and existing records or other documentation which indicates the service line materials used to connect structures to the distribution system.
- All water system records, including distribution system maps and drawings, historical records on each service connection, meter installation records, historical capital improvement or master plans, and standard operating procedures.
- All inspections and records of the distribution system that indicate the material composition of the service connections that connect a structure to the distribution system.

To comply with the LCRR, the State Water Board suggests starting with an evaluation of your system's records. The water system should then consider investigating County and City construction and plumbing codes, going back as far as the beginning of your water system's construction. Interviewing County and City building inspectors would also provide valuable information. Additionally, interviewing local building contractors and plumbers to determine what type of pipe is constructed in various parts of your distribution system is an option. Please document all evaluations and interviews. Other types of identification methods currently used are scratch testing and eddy currents. Predictive modeling has also shown success in various systems.

If you are a community water system with an approved replacement plan, you will need to continue to replace the water-system-owned lead pipes, lead fittings and unknown user service lines in addition to inventorying the remainder of the entire "service line," as defined by the LCRR.

Non-Transient Non-Community water systems will need to develop an inventory of all pipe and fittings material distributing water from the source of supply to the building inlets.

Helpful information sites:

American Water Works Association (AWWA) held a webinar on what the LCRR rule changes mean for water systems in January 2021. It's free and available online here: [W210128 Final Lead and Copper Rule Revisions | GoToStage.com](#).

The Lead Service Line Replacement Collaborative is working on updating its website based on the LCRR changes. Their website is a great resource: [Preparing a Lead Service Line Inventory - LSLR Collaborative \(lslr-collaborative.org\)](#). Please note that this does not reflect rule-specific requirements at this time.

(These Facts were last updated on April 20, 2021)

SUBURBAN WATER SYSTEMS
Distribution List

Attachment A

Page 1 of 3

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