

ORDINANCE NO. 2018-08

A ORDINANCE OF THE CITY COUNCIL OF THE CITY OF EAGLE PASS ("CITY") APPROVING THE CITY'S 2018 WATER CONSERVATION PLAN; AMENDING SECTION 21-51, ARTICLE II, CHAPTER 21 (PLUMBING) OF THE CITY OF EAGLE PASS CODE OF ORDINANCES BY REPLACING THE CURRENTLY REFERENCED WATER CONSERVATION PLAN (ON FILE IN THE OFFICE OF THE CITY SECRETARY) WITH THE 2018 WATER CONSERVATION PLAN APPROVED BY AND ATTACHED TO THIS ORDINANCE; AUTHORIZING AND DIRECTING THAT THE CITY MANAGER OR HIS DESIGNEE FILE THE 2018 WATER CONSERVATION PLAN WITH THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY AND THE TEXAS WATER DEVELOPMENT BOARD AS REQUIRED BY LAW; FINDING THAT THE MEETING AT WHICH THIS ORDINANCE IS PASSED IS OPEN TO THE PUBLIC AS REQUIRED BY LAW; PROVIDING A SEVERABILITY CLAUSE; AND ESTABLISHING AN EFFECTIVE DATE

WHEREAS, The City of Eagle Pass, is Texas municipal corporation operating as a home rule municipality ("City") in accordance with the provisions of Chapter 26 of the Texas Local Government Code and the Eagle Pass City Charter; and

WHEREAS, the City created and established a separate waterworks system pursuant to Article X, Section 10-4(d) of the Eagle Pass City Charter for the use of the public to furnish water and wastewater service and to make and collect such charges and fees for such waterworks as may be fixed by the City Council of the City ("City Council"); and

WHEREAS, the City's waterworks system known as the City of Eagle Pass Water Works System (a) is owned by and is an agency of the City; and (b) manages and operates (i) a water supply, treatment, storage, transmission and distribution system; and (ii) a wastewater collection, transportation, treatment and disposal system; and

WHEREAS, pursuant to Title 31, Part 10, Rules 363.15 and 363.71 of the Texas Administrative Code, entities that are applying for or receiving financial assistance of more than \$500,000 from the Texas Water Development Board ("TWDB") are required to develop, submit, and implement a water conservation program for the life of the loan and report annually on the progress of the program; and

WHEREAS, pursuant to Title 30, Part 1, Rule 295.9 of the Texas Administrative Code, entities that appropriate or use state (*i.e.*, surface) water for municipal use and/or amend existing water rights to change the place of use are required to submit a water conservation plan to the Texas Commission on Environmental Quality ("TCEQ"); and

WHEREAS, pursuant to Section 13.146 of the Texas Water Code and Title 30, Part 1, Rules 288.2 and 288.30 of the Texas Administrative Code, a retail public water supplier with 3,300 or more water connections has to develop and submit a water conservation plan with the

TCEQ and TWDB, and review and update the water conservation plan once every five (5) years thereafter; and

WHEREAS, a water conservation plan is a strategy or combination of strategies for reducing the consumption, loss or waste of water, improving or maintaining the efficiency in the use of water, or increasing recycling and reuse of water, and contains best management practice measures to attempt to meet the targets and goals of the water conservation plan; and

WHEREAS, Section 13.002(19) of the Texas Water Code, defines a "Retail Public Utility" as "any ... municipality, political subdivision ... operating, maintaining, or controlling in this state facilities for providing potable water service or sewer service, or both, for compensation;" and

WHEREAS, the City of Eagle Pass Water Works System ("EPWWS") is a Retail Public Utility, has 17,116 water connections, obtains its water supply through surface water and water rights and has obtained financial assistance from the TWDB in an amount of more than \$500,000; and

WHEREAS, the City through its EPWWS prepared its first water conservation plan and filed it with the TCEQ and TWDB prior to the required deadline of May 1, 2009 and has since updated the plan every five (5) years in compliance with the law; and

WHEREAS, the City through its EPWWS has once again updated the water conservation plan which is due on May 1, 2019; and

WHEREAS, the EPWWS Board of Trustees approved the updated water conservation plan attached hereto as Exhibit "A" and incorporated herein for all purposes ("2018 Water Conservation Plan"); and

WHEREAS, the EPWWS Board of Trustees further recommended to and requested that the City Council approve the 2018 Water Conservation Plan; and

WHEREAS, the City Council finds and determines that approving the 2018 Water Conservation Plan is necessary, required by law, is worthwhile and beneficial for the citizens of the City, and is in the best interest of and will promote the public health, safety, morals and general welfare of the community;

NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF EAGLE PASS:

SECTION 1. That the 2018 Water Conservation Plan is hereby adopted and approved.

SECTION 2. That Section 21-51 of the City of Eagle Pass Code of Ordinances is hereby amended to replace the currently referenced water conservation plan (on file in the office of the City Secretary) with the 2018 Water Conservation Plan approved by and attached to this Ordinance.

SECTION 3. That the City Manager or his designee are hereby authorized and directed to file the 2018 Water Conservation Plan with the TCEQ and TWDB within the time required by law (*i.e.*, within 90 days of adoption of the Plan and this Ordinance) and further to transmit a copy of the 2018 Water Conversation Plan to the Region M Planning Group.

SECTION 4. It is officially found, determined and declared that the meeting at which this Ordinance is adopted was open to the public, and that public notice of the time, place, and subject matter of the public business to be conducted at such meeting, including this Ordinance, was given to all as required by the Texas Codes Annotated, as amended, Title 5, Chapter 551, Government Code.

SECTION 5. If any part, section, paragraph, sentence, phrase, or word of this Ordinance is for any reason held to be unconstitutional, illegal, inoperative, invalid or ineffective, or if any exception to or limitation upon any general provision herein contained is held to be unconstitutional, illegal, inoperative, invalid or ineffective, the remainder of this Ordinance shall nevertheless stand effective and valid as if it had been enacted without the portion held to be unconstitutional, illegal, inoperative, invalid or ineffective.

SECTION 6. This Ordinance becomes effective immediately upon its passage after a third and final reading.

READ, PASSED, AND APPROVED ON FIRST READING, this 20th Day of March, A.D., 2018.



Ramsey English Cantu
Mayor

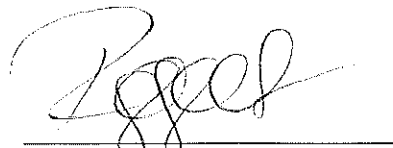
ATTEST:



Imelda B. Rodriguez
City Secretary

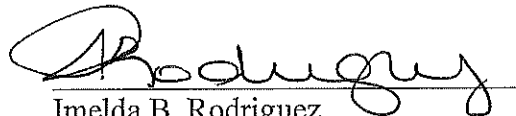
AYES:	English-Cantu, Ramon, Davis Villalpando, Sifuentes
NAYS:	None
ABSTAINED:	None
ABSENT:	None

READ, PASSED, AND APPROVED ON SECOND READING, on this 3rd Day of April, A.D., 2018.



Ramsey English Cantu
Mayor


ATTEST:



Imelda B. Rodriguez
City Secretary

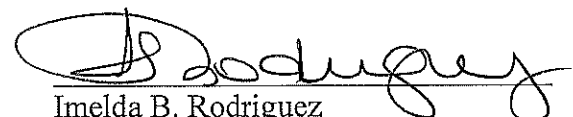
AYES: English-Cantu, Ramon, Davis, Villalpando, Sifuentes
NAYS: None
ABSTAINED: None
ABSENT: None

READ, PASSED, AND APPROVED ON THIRD AND FINAL READING, this 10th Day of April, A.D., 2018.



Ramsey English Cantu
Mayor

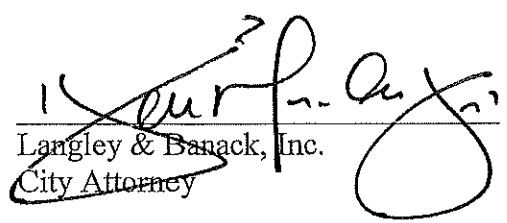
ATTEST:



Imelda B. Rodriguez
City Secretary

AYES: English-Cantu, Davis, Villalpando, Sifuentes
NAYS: None
ABSTAINED: None
ABSENT: Ramon

APPROVED AS TO FORM AND LEGALITY:



Langley & Banack, Inc.
City Attorney

Water Conservation Plan

Eagle Pass Water Works System

2107 N. Veterans Blvd.

Eagle Pass, TX 78852

February 22, 2018

Section I: Introduction and Objectives

In recent years, the increasing population and economic development have led to growing demands for water supplies. At the same time, local and less expensive sources of water supply are already largely developed. Additional supplies to meet future demands will be expensive and difficult to secure. It is therefore important to make efficient use of our existing supplies and make them last as long as possible. This will delay the need for new supplies, minimize the environmental impacts associated with developing new supplies, and delay the high cost of additional water supply development.

Recognizing the need for efficient use of existing water supplies, the Texas Commission on Environmental Quality (TCEQ) has developed guidelines and requirements governing the development of water conservation and drought contingency plans for public water suppliers. The City of Eagle Pass Water Works System (EPWWS) has developed this Water Conservation Plan (Plan), pursuant to TCEQ guidelines and requirements. Therefore, EPWWS hereby adopts the Plan by City of Eagle Pass – Code of Ordinance.

This Plan, intended as a year-round water efficiency plan, includes measures that are designed to result in ongoing, long-term water savings. The overall objectives of this Water Conservation Plan are as follows:

- To reduce water consumption from the levels that would prevail without conservation efforts
- To reduce the loss and waste of water
- To improve the efficiency in the use of water
- To extend the life of current water supplies by reducing the rate of growth in demand

The EPWWS serves the City of Eagle Pass, TX and surrounding areas using its only source, the Rio Grande River. It services approximately 65,051 people through 17,116 connections, with 15,260 residential, 1,148 commercial, and 208 government connections, using a total of 2,498 MG of water (2017 figures). The EPWWS Water Treatment Plant, also known as the Roberto Gonzales Regional Water Treatment Plant (RGRWTP) with capacity of 15MGD, currently utilizes clarifiers (for coagulation and sedimentation) and ultrafiltration (UF) membranes to provide water treatment meeting the TCEQ requirements for Cryptosporidium removal.

Section II: Purpose and State Requirements

The purpose of a water conservation plan is to identify water conservation opportunities and set goals to be accomplished by water conservation measures. The main objective of this Plan is for a strategy or combination of strategies for reducing the consumption of water, reducing the loss or waste of water, and improving the efficiency in the use of water. This Plan meets the requirements set forth by the Texas Water Development Board (TWDB) and the Texas Commission on Environmental Quality (TCEQ) rules governing development of water conservation plans for public water suppliers contained in TAC Title 30, Part 1, Chapter 288, Subchapter A, Rule 288. The Water Conservation Plan (Plan) must be updated every 5 years and must include a Utility Profile (Appendix A).

Section III: Specification of Water Conservation Goals

TCEQ rules require the adoption of specific water conservation goals for water conservation plans. As part of Plan adoption, the EPWWS has developed 5-year and 10-year goals for per capita municipal use (see Table 1). The overall goals for this Plan are as follows:

- Maintain the per capita municipal water use below the specified amount in gallons per capita per day (GPCD) in a normal climate year, as shown in the completed Table 1
- Maintain the level of unaccounted water in the system below 12 percent annually in 2018 and subsequent years
- Increase efficient water usage through water conservation measures
- Raise public awareness of water conservation and encourage responsible public behavior through a public education and information program
- Develop a system specific strategy to conserve water during peak demands, thereby reducing the peak use

Table 1
Five-Year and Ten-Year Municipal Per Capita Water Use Goals (GPCD)

	Historic 5 Year Average	Baseline	5-Year Goal for Year 2022	10-Year Goal for Year 2027
Total GPCD	116	153	145	143
Residential GPCD	68	87	85	82
Water Loss (GPCD)	13	22	16	14
Water Loss Percentage	11.21 %	14.38 %	11.03 %	9.79 %

- Total GPCD = (Total Gallons in System ÷ Permanent Population) ÷ 3652.
- Residential GPCD = (Gallons Used for Residential Use ÷ Residential Population) ÷ 3653.
- Water Loss GPCD = (Total Water Loss ÷ Permanent Population) ÷ 3654.
- Water Loss Percentage = (Total Water Loss ÷ Total Gallons in System) x 100; or (Water Loss GPCD ÷ Total GPCD) x 100
- Based on 2017 Study

EPWWS intends to continue reducing the water consumption as described in Table 1 above to a five-year target of 145 GPCD by 2022, and a ten-year target of 143 GPCD in 2027.

Section IV: Metering, Control of Unaccounted Water, Leak Detection and Repair

One of the key elements of water conservation is tracking water use and controlling losses through illegal diversions and leaks. It is important to carefully meter water use, detect and repair leaks in the distribution system and provide regular monitoring of unaccounted water. All water users, including all facilities pertaining to EPWWS, are presently metered by EPWWS. If water consumption increases or decreases significantly, the meter becomes suspect and is tested or a data log is performed and it's repaired or replaced as necessary.

Section V: Determination and Control of Unaccounted Water

Unaccounted water is the difference between treated water pumped and metered water sales to customers plus authorized but unmetered uses. Authorized, but unmetered, uses would include use for firefighting, releases for flushing of lines, uses associated with new construction, etc. Unaccounted water can include several categories:

- Losses due to water main breaks and leaks in the water distribution system
- Losses due to fire fighting
- Losses due to illegal connections and theft
- Other

Measures to control unaccounted water will be part of the routine operations of EPWWS. Maintenance crews and personnel will test for, observe for, and report evidence of leaks in the water distribution system.

Section VI: Annual Water Conservation Report

EPWWS will continue to complete an annual water conservation report by March 31 each year. This report is utilized to monitor the effectiveness and efficiency of the water conservation program and to plan conservation-related activities for the next year. The report records the water use by category, per capita municipal use and unaccounted water for the previous year and compares them to historical values. A copy of the annual report is provided to the TWDB, responsible for monitoring regional water conservation trends.

Section VII: Public Information and Education Campaign

EPWWS will promote water conservation by informing water users of methods to conserve water inside their homes, buildings, and in recreation uses. Information will be distributed to water users as follows:

- Distribution of educational materials will be made semi-annually to the public and schools in timed to correspond with peak summer demand periods.
- Regular articles will be published in the local newspapers, radio ads, social media and website

- New customers will be provided with general conservation literature when applying for service.
- Rate structure is cost based and does not encourage excessive use of water. This is accomplished by a tiered rate structure with higher rates in dollars per gallon for higher uses of water for all users.

Section VIII: Plumbing Codes, or Rules on Water-Conserving Fixtures

The state has required water-conserving fixtures in new construction and renovations since 1992. The state standards call for flows of no more than 2.2 gallons per minute (gpm) for faucets and 2.5 gpm for showerheads, and 1.28 gallons per flush for toilets. Similar standards are now required nationally under federal law. These state and federal standards assure that all new construction and renovations will use water-conserving fixtures.

Section IX: Enforcement

This Water Conservation Plan is enforced through authority of City of Eagle Pass – Code of Ordinances.

Section X: Coordination with Regional Water Planning Groups

This Water Conservation Plan was developed based on coordination with the Regional Planning Group, Region M. EPWWS will provide a copy of this Plan to the Chairs of Region M Water Planning Group and will continue to work with the regional planning group to improve efficient utilization of existing water resources and water conservation practices.

APPENDIX A

UTILITY PROFILE FOR RETAIL WATER SUPPLIER

CONTACT INFORMATION

Name of Utility:		City of Eagle Pass	
Public Water Supply Identification Number (PWS ID):		TX1620001	
Certificate of Convenience and Necessity (CCN) Number:		10215	
Surface Water Right ID Number:		124-B, 3998-H, 952-D	
Wastewater ID Number:		20079	
Contact:	First Name:	JORGE L.	Last Name:
	Title:	ASST. GENERAL MGR	
Address:	P.O. BOX 808	City:	EAGLE PASS State: TX
Zip Code:	78853	Zip+4:	
		Email:	JFLORES@EPWATERWORKS.ORG
Telephone Number:	8307732351	Date:	6/27/2017

Is this person the designated Conservation Coordinator? Yes No

Error: Subreport could not be shown.

Regional Water Planning Group: M

Groundwater Conservation District:

Our records indicate that you:

- Received financial assistance of \$500,000 or more from TWDB
- Have 3,300 or more retail connections
- Have a surface water right with TCEQ

A. Population and Service Area Data

1. Current service area size in square miles: 25

Attached file(s):

File Name	File Description
EPWWS SERVICE AREA MAP.png	

UTILITY PROFILE FOR RETAIL WATER SUPPLIER

2. Historical service area population for the previous five years, starting with the most current year.

Year	Historical Population Served By Retail Water Service	Historical Population Served By Wholesale Water Service	Historical Population Served By Wastewater Water Service
2016	64,444	0	
2015	63,609	0	
2014	62,789	0	
2013	61,529	0	
2012	60,763	0	

3. Projected service area population for the following decades.

Year	Projected Population Served By Retail Water Service	Projected Population Served By Wholesale Water Service	Projected Population Served By Wastewater Water Service
2020	51,989	0	0
2030	54,443	0	0
2040	56,566	0	0
2050	58,772	0	0
2060	0	0	0

4. Described source(s)/method(s) for estimating current and projected populations.

Based on 2010 US Census, using tract level data prorated for partial coverage. Growth rates are based on TWDB approved population projections, calculated to determine equivalent annual growth rates.

Conservation staff note 6/16/17: many of the calculated numbers will not be consistent with the UP data entered and the UP itself will appear incomplete, but that is because the City completed the update in 2013 for 2014, so the data used was 2008-2012. (SRL)

UTILITY PROFILE FOR RETAIL WATER SUPPLIER

B. System Input

System input data for the previous five years.

Total System Input = Self-supplied + Imported – Exported

Year	Water Produced in Gallons	Purchased/Imported Water in Gallons	Exported Water in Gallons	Total System Input	Total GPCD
2016	2,453,057,576	0	0	2,453,057,576	104
2015	2,364,632,653	0	0	2,364,632,653	101
2014	2,838,608,247	0	0	2,838,608,247	123
2013	2,885,663,918	0	0	2,885,663,918	128
2012	2,687,360,825	0	0	2,687,360,825	121
Historic 5-year Average	2,645,864,644	0	0	2,645,864,644	115

C. Water Supply System

1. Designed daily capacity of system in gallons 15,000,000
2. Storage Capacity
 - 2a. Elevated storage in gallons: 4,838,000
 - 2b. Ground storage in gallons: 3,002,000

UTILITY PROFILE FOR RETAIL WATER SUPPLIER

D. Projected Demands

1. The estimated water supply requirements for the next ten years using population trends, historical water use, economic growth, etc.

Year	Population	Water Demand (gallons)
2018	56,141	2,458,975,800
2019	57,010	2,497,038,000
2020	57,893	2,542,660,560
2021	58,790	2,575,002,000
2022	0	0
2023	0	0
2024	0	0
2025	0	0
2026	0	0
2027	0	0

2. Description of source data and how projected water demands were determined.

Annual water demand in section F is calculated using the population projections (based on 2010 census data and TWDB approved projected growth rates), and the 5-year Total gallons per capita per day water use from table E4 above.

Conservation staff note 6/16/17: The City's original (PDF) version is from 2014, so they only projected from 2012-2021. (SRL)

UTILITY PROFILE FOR RETAIL WATER SUPPLIER

E. High Volume Customers

1. The annual water use for the five highest volume **RETAIL** customers.

Customer	Water Use Category	Annual Water Use	Treated or Raw
Eagle Pass ISD	Institutional	55,706,000	Treated
Eagle Pass Housing Authority	Institutional	46,196,000	Treated
Kickapoo Traditional Tribe of Texas	Institutional	32,351,000	Treated
Maverick County	Institutional	15,089,000	Treated
Rio Grande Apartments	Commercial	7,356,000	Treated

2. The annual water use for the five highest volume **WHOLESALE** customers.

Customer	Water Use Category	Annual Water Use	Treated or Raw
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F. Utility Data Comment Section

Additional comments about utility data.

Section II: System Data

A. Retail Water Supplier Connections

1. List of active retail connections by major water use category.

Water Use Category Type	Total Retail Connections (Active + Inactive)	Percent of Total Connections
Residential - Single Family	15,107	91.76 %
Residential - Multi-Family	0	0.00 %
Industrial	0	0.00 %
Commercial	1,153	7.00 %
Institutional	203	1.23 %
Agricultural	0	0.00 %
Total	16,463	100.00 %

UTILITY PROFILE FOR RETAIL WATER SUPPLIER

2. Net number of new retail connections by water use category for the previous five years.

	Net Number of New Retail Connections						
Year	Residential - Single Family	Residential - Multi-Family	Industrial	Commercial	Institutional	Agricultural	Total
2016							
2015							
2014							
2013							
2012							

B. Accounting Data

The previous five years' gallons of RETAIL water provided in each major water use category.

Year	Residential - Single Family	Residential - Multi-Family	Industrial	Commercial	Institutional	Agricultural	Total
2016	1,440,255,000	0	0	321,449,000	169,963,000	0	1,931,667,000
2015	1,440,112,000	0	0	373,004,000	151,869,000	0	1,964,985,000
2014	1,660,389,000	0	0	368,592,000	234,826,000	0	2,263,807,000
2013	1,550,983,000	0	0	343,871,000	182,619,000	0	2,077,473,000
2012	1,665,223,000	0	0	365,382,000	266,584,000	0	2,297,189,000

UTILITY PROFILE FOR RETAIL WATER SUPPLIER

C. Residential Water Use

The previous five years residential GPCD for single family and multi-family units.

Year	Residential - Single Family	Residential - Multi-Family	Total Residential
2016			61
2015			62
2014			72
2013			69
2012	75		75
Historic Average	75	0	68

D. Annual and Seasonal Water Use

1. The previous five years' gallons of treated water provided to RETAIL customers.

Month	Total Gallons of Treated Water				
	2016	2015	2014	2013	2012
January					162,430,000
February					137,950,000
March					173,170,000
April					201,790,000
May					206,490,000
June					290,260,000
July					284,910,000
August					319,540,000
September					247,550,000
October					205,920,000
November					198,820,000
December					179,100,000
Total					2,607,930,000

UTILITY PROFILE FOR RETAIL WATER SUPPLIER

2. The previous five years' gallons of raw water provided to RETAIL customers.

Month	Total Gallons of Raw Water				
	2016	2015	2014	2013	2012
January					
February					
March					
April					
May					
June					
July					
August					
September					
October					
November					
December					
Total					

3. Summary of seasonal and annual water use.

	Summer RETAIL (Treated + Raw)	Total RETAIL (Treated + Raw)
2016	0	
2015	0	
2014	0	
2013	0	
2012	894,710,000	2,607,930,000
Average in Gallons	9,620,537.63	217,327,500.00

UTILITY PROFILE FOR RETAIL WATER SUPPLIER

E. Water Loss

Water Loss data for the previous five years.

Year	Total Water Loss in Gallons	Water Loss in GPCD	Water Loss as a Percentage
2016	338,852,193	14	13.81 %
2015	391,355,991	17	16.55 %
2014	215,345,319	9	7.59 %
2013	197,148,119	9	6.83 %
2012	354,419,814	16	13.19 %
Average	299,424,287	13	11.59 %

F. Peak Day Use

Average Daily Water Use and Peak Day Water Use for the previous five years.

Year	Average Daily Use (gal)	Peak Day Use (gal)	Ratio (peak/avg)
2012	7,145,013	9725108	1.3611
2013	0	0	0.0000
2014	0	0	0.0000
2015	0	0	0.0000
2016	0	0	0.0000

G. Summary of Historic Water Use

Water Use Category	Historic Average	Percent of Connections	Percent of Water Use
Residential - Single Family	1,551,392,400	91.76 %	73.63 %
Residential - Multi-Family	0	0.00 %	0.00 %
Industrial	0	0.00 %	0.00 %
Commercial	354,459,600	7.00 %	16.82 %
Institutional	201,172,200	1.23 %	9.55 %
Agricultural	0	0.00 %	0.00 %

UTILITY PROFILE FOR RETAIL WATER SUPPLIER

H. System Data Comment Section

Section III: Wastewater System Data

A. Wastewater System Data

1. Design capacity of wastewater treatment plant(s) in gallons per day: 7,500,000

2. List of active wastewater connections by major water use category.

Water Use Category	Metered	Unmetered	Total Connections	Percent of Total Connections
Municipal			0	0.00 %
Industrial			0	0.00 %
Commercial			0	0.00 %
Institutional			0	0.00 %
Agricultural			0	0.00 %
Total			0	100.00 %

3. Percentage of water serviced by the wastewater system: 88.00 %

UTILITY PROFILE FOR RETAIL WATER SUPPLIER

4. Number of gallons of wastewater that was treated by the utility for the previous five years.

Month	Total Gallons of Treated Water				
	2016	2015	2014	2013	2012
January					73,747,000
February					87,317,000
March					93,579,000
April					85,686,000
May					83,284,000
June					82,562,000
July					80,560,000
August					77,180,000
September					86,753,000
October					89,240,000
November					87,562,000
December					84,473,000
Total					1,011,943,000

5. Could treated wastewater be substituted for potable water?

Yes
 No

B. Reuse Data

1. Data by type of recycling and reuse activities implemented during the current reporting period.

Type of Reuse	Total Annual Volume (in gallons)
On-site Irrigation	
Plant wash down	
Chlorination/de-chlorination	
Industrial	
Landscape irrigation (park,golf courses)	63,715,000
Agricultural	40,155,000
Discharge to surface water	
Evaporation Pond	
Other	
Total	103,870,000

UTILITY PROFILE FOR RETAIL WATER SUPPLIER

C. Wastewater System Data Comment

Additional comments and files to support or explain wastewater system data listed below.