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Suburban Water Systems

2025 WATER SHORTAGE CONTINGENCY PLAN

SUBURBAN WATER SYSTEMS

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2025 WATER SHORTAGE CONTINGENCY PLAN

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ABBREVIATIONS AND ACRONYMS

AF	acre-feet
Annual Assessment	Annual Water Supply and Demand Assessment
AWIA	America's Water Infrastructure Act of 2018
CBMWD	Central Basin Municipal Water District
CPUC	California Public Utilities Commission
CSIP	Catastrophic Supply Interruption Plan
CWC	California Water Code
DLRMA	Drought Lost Revenue Memorandum Account
DRA	Drought Risk Assessment
EOC	Emergency Operations Center
ERP	Emergency Response Plan
GIS	Geographic Information System
IC	Incident Commander
ICS	Incident Command System
LHMP	Local Hazard Mitigation Plan
MWD	Metropolitan Water District of Southern California
OES	Office of Emergency Services
RRA	Risk and Resilience Assessment
SEMS	Standardized Emergency Management System
SWP	State Water Project
TVMWD	Three Valleys Municipal Water District
USGVMWD	Upper San Gabriel Valley Municipal Water District
UWMP	Urban Water Management Plan
WSAP	Water Supply Allocation Plan
WSCP	Water Shortage Contingency Plan
WSDM	Water Surplus and Drought Management

1 INTRODUCTION

☑ ***CWC § 10640***

(a) Every urban water supplier required to prepare a plan pursuant to this part shall prepare its plan pursuant to Article 2 (commencing with Section 10630). The supplier shall likewise periodically review the plan as required by Section 10621, and any amendments or changes required as a result of that review shall be adopted pursuant to this article.

(b) Every urban water supplier required to prepare a water shortage contingency plan shall prepare a water shortage contingency plan pursuant to Section 10632. The supplier shall likewise periodically review the water shortage contingency plan as required by paragraph (10) of subdivision (a) of Section 10632 and any amendments or changes required as a result of that review shall be adopted pursuant to this article.

Water supplies may be interrupted or reduced significantly in a number of ways, including droughts, earthquakes, and power outages, that hinder a water agency's ability to effectively deliver water. The ability to manage water supplies in times of drought or other emergencies is an important part of water resources management for a community. Recent water supply challenges throughout the American Southwest and the State of California have resulted in the development of several policy actions that water agencies would implement in the event of a water shortage. In Southern California, the development of such policies has occurred at both the wholesale and retail level.

This Water Shortage Contingency Plan (WSCP) is developed to serve as a flexible framework for planned response measures to mitigate future water supply shortages for Suburban Water Systems (Suburban). The WSCP includes the stages of response to a water shortage caused by drought or by supply interruptions caused by infrastructure failure, regulatory mandate, or catastrophic human-caused or natural events. The primary objective of the WSCP is to ensure that Suburban has in place the necessary resources and management responses needed to protect health and human safety, minimize economic disruption, and preserve environmental and community assets during water supply shortages and interruptions. The WSCP also includes procedures to conduct an annual assessment of water supply and demand in order to determine whether water shortage conditions are likely to exist in the forthcoming year, and to proactively begin the process of implementing WSCP stages of action, as appropriate.

This WSCP has been prepared in accordance with California Water Code (CWC) § 10640 and CWC § 10632 of the UWMP Act. Text from the UWMP Act has been included in grey text boxes with italicized font at beginning of relevant sections of this WSCP. The information presented in the respective WSCP sections and the associated text and tables are collectively intended to fulfill the requirements of that sub-section of the UWMP Act.

2 WATER SUPPLY RELIABILITY ANALYSIS

☑ ***CWC §10632***

(a)(1) The analysis of water supply reliability conducted pursuant to Section 10635.

This section provides a summary of Suburban's water supply reliability analysis, recognizing that the WSCP is intended to be a standalone document that can be adopted and amended independently.

Suburban plans to rely on three main water supply sources: purchased/imported water from wholesalers, Suburban's own groundwater production from adjudicated basins, and recycled water. The reliability analysis was performed based on, among other things, Metropolitan Water District of Southern California's (MWD's) water reliability analysis and Suburban's adjudicated rights to produce groundwater in Main San Gabriel Basin and Central Basin. Based on the service reliability analysis, Suburban is expected to have adequate water supplies during all hydrologic scenarios, including normal years, single dry years, and multiple dry years, to meet projected demands through 2050.

A Drought Risk Assessment (DRA) was also conducted during the water supply reliability assessment, which evaluates the effects on available water supply sources of an assumed five-year drought commencing the year after the assessment is completed (i.e., from 2026 through 2030). Based on the DRA, Suburban is expected to have sufficient water supply from 2026 to 2030. This WSCP addresses potential water shortage conditions and identifies a variety of actions that Suburban will implement to reduce demand and further ensure supply reliability at various levels of water shortage.

3 ANNUAL ASSESSMENT PROCEDURES

☑ ***CWC §10632***

(a) Every urban water supplier shall prepare and adopt a water shortage contingency plan as part of its urban water management plan that consists of each of the following elements

(a)(2) The procedures used in conducting an annual water supply and demand assessment that include, at a minimum, both of the following:

(A) The written decision-making process that an urban water supplier will use each year to determine its water supply reliability.

(B) The key data inputs and assessment methodology used to evaluate the urban water supplier's water supply reliability for the current year and one dry year, including all of the following:

(i) Current year unconstrained demand, considering weather, growth, and other influencing factors, such as policies to manage current supplies to meet demand objectives in future years, as applicable.

(ii) Current year available supply, considering hydrological and regulatory conditions in the current year and one dry year. The annual supply and demand assessment may consider more than one dry year solely at the discretion of the urban water supplier.

(iii) Existing infrastructure capabilities and plausible constraints.

(iv) A defined set of locally applicable evaluation criteria that are consistently relied upon for each annual water supply and demand assessment.

(v) A description and quantification of each source of water supply.

☑ ***CWC §10632.1***

An urban water supplier shall conduct an annual water supply and demand assessment pursuant to subdivision (a) of Section 10632 and, on or before July 1 of each year, submit an annual water shortage assessment report to the department with information for anticipated shortage, triggered shortage response actions, compliance and enforcement actions, and communication actions consistent with the supplier's water shortage contingency plan. An urban water supplier that relies on imported water from the State Water Project or the Bureau of Reclamation shall submit its annual water supply and demand assessment within 14 days of receiving its final allocations, or by July 1 of each year, whichever is later.

☑ ***CWC § 10632.2***

An urban water supplier shall follow, where feasible and appropriate, the prescribed procedures and implement determined shortage response actions in its water shortage contingency plan, as identified in subdivision (a) of Section 10632, or reasonable alternative actions, provided that descriptions of the alternative actions are submitted with the annual water shortage assessment report pursuant to Section 10632.1. Nothing in this section prohibits an urban water supplier from taking actions not specified in its water shortage contingency plan, if needed, without having to formally amend its urban water management plan or water shortage contingency plan.

Under CWC Section 10632(a)(2), beginning by July 1, 2022, each urban water supplier is required to prepare their annual water supply and demand assessment (Annual Assessment) and submit an Annual Water Shortage Assessment Report to DWR. The Annual Water Shortage Assessment Report will be due by July 1 of every year, as required by CWC Section 10632.1.

This section outlines Suburban's procedures used in conducting an Annual Assessment, including the following: 1) written decision-making process for determining water supply reliability; and 2) key data inputs and assessment methodology for evaluating the water supply reliability for the current year and one dry year.

Each element of the Annual Assessment is described below, along with the key data inputs and methodologies for determining these elements, and expected timing of the decision process.

3.1 Decision-Making Process

Suburban's Annual Assessment is primarily based on daily recorded water production and supply figures, which are reported to the Water Production Manager on a daily basis throughout the year. To determine its water supply reliability and actual reductions in water use during declared water shortages or emergencies, Suburban can rely on its daily records as well as the monthly totals. These periodic analyses are used by Suburban to manage resources to meet projected demands and adjust to changing conditions (i.e., precipitation) throughout the year.

Starting in 2022, Suburban staff began submitting and presenting a finalized Annual Water Shortage Assessment Report to Suburban's President for approval by June each year. As needed, Suburban presents a determination of recommended water shortage response actions deemed appropriate as a result of the Annual Assessment. Following approval, Suburban staff submit the approved Annual Water Shortage Assessment Report to DWR by July 1 of every year. The functional procedures for the decision-making process are depicted in the following timeline shown in **Figure 1**.

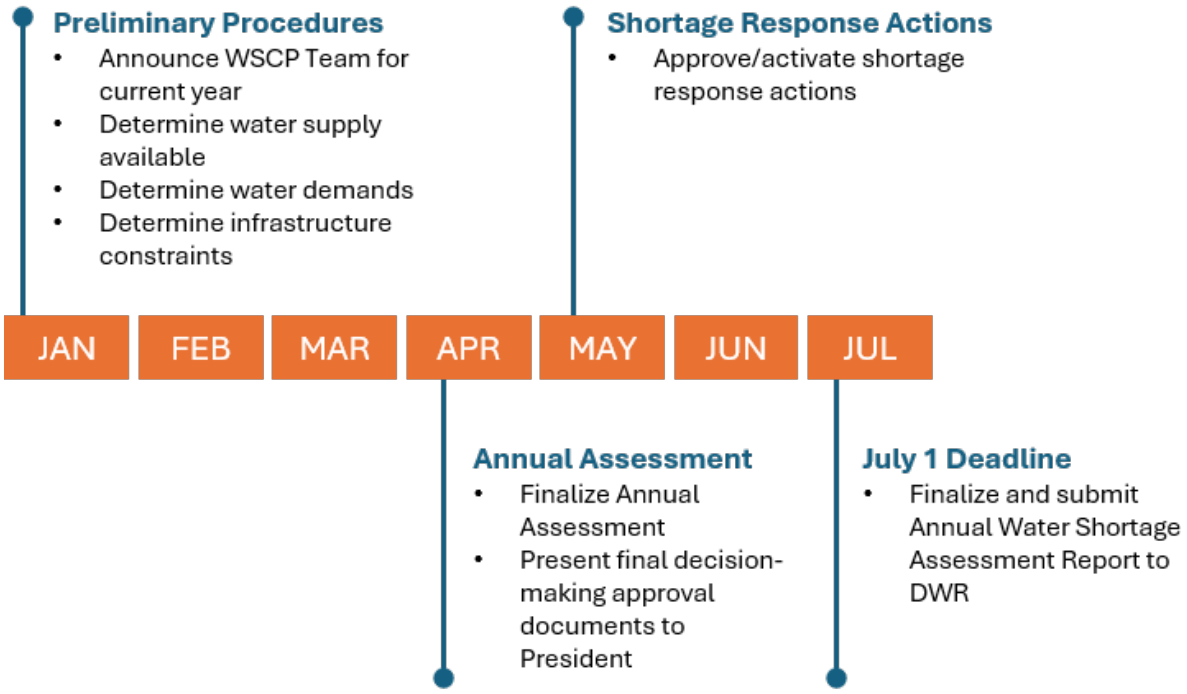

Figure 1: Annual Assessment Decision-Making Process Timeline

3.2 Data and Methodologies

This section defines the key data inputs and assessment methodology used to evaluate the water supply reliability for the anticipated conditions for the current year and for one dry year that follows. The Annual Assessment determination will focus on the current year unconstrained demand, infrastructure constraints, and total water supply availability. Moreover, the Annual Assessment will consider the current year's weather, population growth, policies in place that will impact demands, and other influencing factors. The current year available supply will incorporate the hydrological regulatory conditions for the current year and following dry year.

3.2.1 Locally applicable evaluation criteria

The locally applicable evaluation criteria that will be consistently relied on for each Annual Assessment include the following:

1) Assumed unconstrained demand (i.e., demand without any conservation measures) for current year and one dry year
2) Assumed total water supply availability for current year and one dry year
3) Existing infrastructure capabilities and plausible constraints
    - Any known issues with the water facilities (including water quality conditions limiting local sources)
    - Planned power outages for operation and maintenance
    - New construction and repairs
    - Environmental mitigation measures
    - Other constraints that may affect near-term water supply reliability

3.2.2 Water Supply Sources Description and Quantification

As part of the Annual Assessment, the total available water supply evaluation criteria will be comprised of Suburban's water supply sources. Suburban will coordinate with its wholesalers to evaluate availability of supplies for purchase, and rely on watermaster information regarding pumping allocations and stored water availability to determine availability of groundwater supplies.

3.2.3 Unconstrained Customer Demand

Unconstrained customer demands (i.e., the expected water use in the absence of shortage-caused reductions in water use) will be evaluated and estimated for the forthcoming year based on:

- A comparison of monthly customer demands relative to prior years (e.g., last 3 years),
- Evaluation of current and anticipated weather conditions,
- New demands anticipated during the coming year (e.g., new accounts coming online), and
- Any other potentially pertinent factors identified by Suburban.

3.2.4 Planned Water Use for Current Year Considering Dry Subsequent Year

Suburban will compare the estimated unconstrained demands to the anticipated supplies for the current year, assuming that the following year will be dry (i.e., a planning assumption of a 10 percent supply shortfall relative to a normal year, consistent with Stage 1 shortage conditions).

3.2.5 Infrastructure Considerations

Suburban will evaluate how infrastructure capabilities and constraints may affect its ability to deliver supplies to meet expected customer water demands in the coming year. The constraints and capabilities are expected to include, among other things:

- Anticipated capital projects and upgrades, and
- Anticipated maintenance and repairs.

4 SHORTAGE STAGES

☑ ***CWC §10632 (a)(3)***

(A) Six standard water shortage levels corresponding to progressive ranges of up to 10, 20, 30, 40, and 50 percent shortages and greater than 50 percent shortage. Urban water suppliers shall define these shortage levels based on the suppliers' water supply conditions, including percentage reductions in water supply, changes in groundwater levels, changes in surface elevation or level of subsidence, or other changes in hydrological or other local conditions indicative of the water supply available for use. Shortage levels shall also apply to catastrophic interruption of water supplies, including, but not limited to, a regional power outage, an earthquake, and other potential emergency events.

(B) An urban water supplier with an existing water shortage contingency plan that uses different water shortage levels may comply with the requirement in subparagraph (A) by developing and including a cross-reference relating its existing categories to the six standard water shortage levels.

Suburban's WSCP for the San Jose Hills and Whittier/La Mirada service areas is the combination of Tariff Rule No. 14.1 and Tariff Schedule No. 14.1, which are both included as **Attachment B**. The purpose of the WSCP is to detail actions and restrictions to be followed during the various stages of a water shortage. Suburban has established diverse approaches to meeting future water demands including: facility improvements and increased deliveries of local groundwater; increased deliveries of imported water; implementing a recycled water program; and supporting water demand management programs. This has allowed Suburban to meet most demands despite drought conditions; however, water shortages can be triggered by a hydrologic limitation in supply, limitations or failure of supply and treatment infrastructure, or both. Hydrologic or drought limitations tend to develop and abate more slowly, whereas infrastructure failure tends to happen quickly and relatively unpredictably. Suburban's WSCP ensures that water demands are met promptly and equitably.

4.1 Suburban Shortage Stages of Action

As a regulated utility, Suburban's rates are determined by the California Public Utilities Commission (CPUC), including drought surcharge rates and penalties. Since the mid-1980s, the CPUC allows all classes of water utilities to file a water conservation and rationing plan consisting of two distinct tariffs: Rule No. 14.1 (the voluntary conservation program) and Schedule No. 14.1 (the mandatory rationing with drought surcharge rates and penalties).

The CPUC has jurisdiction over Suburban because Suburban is an Investor-owned Water Utility. The CWC requires suppliers who are subject to regulation by the CPUC to secure its approval before imposing water consumption regulations and restrictions required by water supply shortage emergencies. Therefore, all retail private water utilities are bound by Tariff Rule No. 14.1, which provides three levels of water conservation actions: 1) voluntary rationing, 2) mandatory rationing, and 3) service connection moratorium. The WSCP provides the actions implemented by Suburban during the various stages of a water shortage and includes the water conservation requirements for customers during each stage.

Suburban's WSCP includes actions to undertake in response to water supply shortages and is divided into four stages. The actions to be undertaken during each stage include, but are not limited to, the following:

- Stage 1 - Stage 1 prohibits the non-essential or unauthorized use of water. It restricts irrigation/commercial use and requires repairs completed in five days. Prior to implementing Stage 1, Suburban must obtain approval from the CPUC to activate Tariff Rule No. 14.1.
- Stage 2 - While including Stage 1 restrictions, Stage 2 further requires repairs completed in three days. Prior to implementing Stage 2, Suburban must obtain approval from the CPUC to activate Tariff Schedule No. 14.1.

- Stage 3 - While including Stages 1 and 2 restrictions, Stage 3 further restricts irrigation. Once Tariff Schedule No. 14.1 is activated in Stage 2, Suburban is authorized to implement Stage 3 by filing a Tier 2 advice letter with the CPUC.
- Stage 4 - While including Stages 1, 2, and 3, Stage 4 implements flow restrictors and requires immediate repair of leaks, breaks or malfunctions. Once Stage 3 is implemented, Suburban is authorized to implement Stage 4 by filing a Tier 2 advice letter with the CPUC.

The water supply condition required for each stage is not defined, such as a specific reservoir level or groundwater level or a percent of supply reduction, due to the differing sources of Suburban's water supply. Instead, each stage is implemented when the previous stage becomes insufficient in complying with the necessary reduction, as shown in **Table 1**. Each stage can be implemented when it is determined conditions exist requiring a further consumer demand reduction for more efficient use of water or when a government agency requests implementation of this stage to meet physical supply limitations.

Per CWC Section 10632(a)(3)(B), a supplier may continue using their own water shortage levels that were previously used. In accordance with this allowance, Suburban has chosen to continue to use its current water shortage levels in its WSCP and has correlated its water shortage levels to the six standard water shortage levels defined in CWC Section 10632(a)(3)(A), as shown in **Table 1**.

Table 1 Cross-reference for Standard vs Supplier Shortage Levels for Combined Suburban Service Areas (DWR Table 8-1)

☐	Checked box indicates the supplier uses the standard six levels of water shortage (and supplier will not complete this table).		
Standard Shortage Levels	**Percent Shortage Range**	**Suppliers Shortage Levels**	**Percent Shortage Range**
1	Up to 10%	1	Up to 10%
2	Up to 20%	2	Up to 20%
3	Up to 30%	3	Up to 30%
4	Up to 40%		Up to 40%
5	Up to 50%	4	Up to 50%
6	>50%		>50%

As reflected in **Table 1**, the mandatory prohibitions applied by Stage 4 will curtail water use more than 50 percent below the projected water consumption level. Correspondingly, Suburban's shortage stages depicted in **Table 1** are bundled in such a way that if a conservation stage to reduce water consumption by 50 percent were mandated (CWC standard shortage level 5), the prohibitions and additional conservation measures activated by Suburban's Stage 4 will provide more than enough shortage responses to exceed the conservation goal.

Suburban plans to submit to the CPUC an update to Schedule 14.1 to align with the WSCP including, but not limited to, consistency with the new six stage shortage level structure.

4.2 MWD Water Surplus and Drought Management Plan

In addition to the provisions of Tariff Rule No. 14.1, Suburban works in conjunction with its wholesalers (Central Basin Municipal Water District [CBMWD], Upper San Gabriel Valley Municipal Water District [USGVMWD], and Three Valleys Municipal Water District [TVMWD]) to implement conservation measures within the framework of MWD's Water Surplus and Drought Management (WSDM) Plan. The WSDM Plan was developed in 1999 by MWD with assistance and input from its member agencies. The plan addresses both surplus and shortage contingencies. MWD's WSDM Plan documents the stages of action that it would undertake in response to a water supply shortage.

The WSDM Plan guiding principle is to minimize adverse impacts of water shortage. The plan guides the operations of water resources (local resources, Colorado River, State Water Project (SWP), and regional storage) to ensure regional reliability. It identifies the expected sequence of resource management actions MWD will take during surpluses and shortages of water to minimize the probability of severe shortages, which require curtailment of full-service demands. Mandatory allocations are avoided to the practical extent; however, in the event of an extreme shortage, an allocation plan will be implemented.

In addition to its WSDM Plan, MWD developed a Water Supply Allocation Plan (WSAP), which provides a standardized methodology for allocation of supplies during times of extreme shortage. During a shortage, Suburban's imported water supplies will be allocated based on the methodology documented in the Allocation Plans of CBMWD, USGVMWD, and TVMWD, which typically mirror the MWD allocation plan.

The following description of shortage stages is from MWD's 2025 UWMP, page 2-37:

> ***Shortage:*** *Metropolitan can meet full-service demands and partially meet or fully meet interruptible demands, using stored water or water transfers as necessary.*
>
> ***Severe Shortage****: Metropolitan can meet full-service demands only by using stored water, transfers, and possibly calling for extraordinary conservation.*
>
> ***Extreme Shortage****: Metropolitan allocates available supply to full-service customers.*
>
> *The WSDM Plan also defines six shortage management stages to guide resource management activities. These stages are not defined merely by shortfalls in imported water supply, but also by the water balances in Metropolitan's storage programs. Thus, a ten percent shortfall in imported supplies could be a stage one shortage if storage levels are high. If storage levels are already depleted, the same shortfall in imported supplies could potentially be defined as a more severe shortage.*
>
> *When Metropolitan must make net withdrawals from storage to meet demands, it is considered to be in a shortage condition. Under most of these stages, Metropolitan is still able to meet all end-use demands for water. For shortage stages 1 through 3, Metropolitan will meet demands by withdrawing water from storage. At shortage stages 4 and 5, Metropolitan may undertake additional shortage management steps, including issuing public calls for extraordinary conservation and exercising water transfer options, or purchasing water on the open market.*

4.2.1 MWD Water Supply Allocation Plan (For WSDM Shortage Stage 7)

In February 2008, MWD's Board of Directors adopted a WSAP, which includes a methodology for calculating supply allocations in case of extreme water shortages. MWD revised its WSAP in 2014 to incorporate demand hardening adjustments, groundwater replenishment allocations, and replace WSAP Penalty Rates with Allocation Surcharges based on the marginal costs of turf removal.

It should be noted that the WSAP is not a rationing plan. Rather, it is a pricing plan where water is allocated at regular prices and agencies that choose to take more than the allocated water pay surcharges. The surcharge pricing mechanism acts to discourage the use of water above the allocation. The WSAP uses a combination of estimated total retail demands and historical local supply production within the member agency service area to estimate the demands on MWD from each member agency in a given year. Based on a number of factors, including storage and supply conditions, MWD then determines whether it has the ability to meet these demands or will need to allocate its limited supplies among its member agencies. Thus, implicit in MWD's decision not to implement an allocation of its supplies is that, at a minimum, MWD will be able to meet the demands identified for each of the member agencies.

Additional information regarding the allocation formula is available in Chapter 2 of MWD's 2025 UWMP.

5 SHORTAGE RESPONSE ACTIONS

☑ ***CWC §10632***

(a)(4) Shortage response actions that align with the defined shortage levels and include, at a minimum, all of the following:

(A) Locally appropriate supply augmentation actions.

(B) Locally appropriate demand reduction actions to adequately respond to shortages.

(C) Locally appropriate operational changes.

(D) Additional, mandatory prohibitions against specific water use practices that are in addition to state-mandated prohibitions and appropriate to the local conditions.

(E) For each action, an estimate of the extent to which the gap between supplies and demand will be reduced by implementation of the action.

☑ ***CWC §10632.2***

An urban water supplier shall follow, where feasible and appropriate, the prescribed procedures and implement determined shortage response actions in its water shortage contingency plan, as identified in subdivision (a) of Section 10632, or reasonable alternative actions, provided that descriptions of the alternative actions are submitted with the annual water shortage assessment report pursuant to Section 10632.1. Nothing in this section prohibits an urban water supplier from taking actions not specified in its water shortage contingency plan, if needed, without having to formally amend its urban water management plan or water shortage contingency plan.

5.1 Prohibitions

Suburban's WSCP details the various prohibitions and sets forth water use violation fines, charges for removal of flow restrictors, and establishes the period during which mandatory conservation and rationing measures will be in effect. The prohibitions on various wasteful water uses are summarized in **Table 2**. A complete listing can be found in Tariff Rule No. 14.1 in Attachment B.

Table 2 Restrictions and Prohibitions

Stage No.	Restrictions and Prohibitions on End Users	Additional Explanation (as needed)
1-4	Landscape - Restrict or prohibit runoff from landscape irrigation	
1-4	Landscape - Limit landscape irrigation to specific times	
1-4	Landscape - Limit landscape irrigation to specific days	
1-4	CII - Lodging establishment must offer opt out of linen service	
1-4	CII - Restaurants may only serve water upon request	
1-4	CII - Other CII restriction or prohibition	Hydrants only for fire suppression or system maintenance.
1-4	Water Features - Restrict water use for decorative water features, such as fountains	
1-4	Other - Customers must repair leaks, breaks, and	

Stage No.	Restrictions and Prohibitions on End Users	Additional Explanation (as needed)
	malfunctions in a timely manner	
1-4	Other - Require automatic shut-off hoses	
1-4	Other - Prohibit use of potable water for construction and dust control	Prohibits excessive use.
1-4	Other - Prohibit use of potable water for washing hard surfaces	
1-4	Other - Prohibit vehicle washing except at facilities using recycled or recirculating water	Commercial transportation only, residential vehicles okay with auto shut off hose.
1-4	Other	Any other wasteful practice.
4	Other	Suburban allowed to install flow restrictor.

5.2 Demand Reduction

Most actions within Suburban's WSCP leave the responsibility to restrict water use to the customer; however, installation of flow restrictors on customers' service lines automatically reduces consumption. Suburban may install flow restrictors during Stage 4, or for excessive violations or for egregious violation. In addition to the physical consumption reduction by flow restrictors, Suburban uses other methods to reduce consumption. These methods include expanding public information campaigns, offering water use surveys, providing rebates on plumbing fixtures and devices, and providing rebates for landscape irrigation efficiency. Consumption reduction methods are shown in **Table 3**. Note that the rebates are offered through MWD to Suburban's customers on the SoCal Water$mart website.

Table 3 Demand Reduction Actions for Combined Suburban Service Areas (DWR Table 8-3)

No	Is the Supplier completing this table using the standard six levels?				
Shortage Level (a)	**Demand Reduction Actions**	**How much is this going to reduce the shortage gap?**		**Additional Explanation or Reference** (OPTIONAL)	**Penalty, Charge, or Other Enforcement**
		Volume or Percentage	Shortage Gap Reduction Value		
1	Landscape - Limit landscape irrigation to specific days	Percentage	10-50%	Irrigating ornamental landscapes with potable water is limited to no more than three (3) days per week, on a schedule established and posted by Suburban on its website or otherwise provided to customer by bill message, bill insert, direct mail, or email.	Yes
1	Landscape - Limit landscape irrigation to specific times	Percentage	10-50%	Irrigating ornamental landscapes with potable water is prohibited during the hours between 8:00 am and 6:00 pm.	Yes
1	Landscape - Other landscape restriction or prohibition	Percentage	10-50%	Watering or irrigating any lawn, landscape, or other vegetated area with potable water during and for 48 hours following measurable rainfall is prohibited. Exclusions are mentioned in Tariff Rule No. 14.1.	Yes
1	Landscape - Restrict or prohibit runoff from landscape irrigation	Percentage	10-50%	Watering or irrigating of any lawn, landscape, or other vegetated area in a manner that causes or allows excessive water flow or runoff such that water flows onto adjacent property, non-irrigated areas, private and public walkways, roadways, parking lots, or structures is prohibited.	Yes
1	Other	Percentage	10-50%	The use of a hose that dispenses potable water to wash a motor vehicle, except where the hose is fitted with a shut-off nozzle or device attached to it is prohibited. Use of water for washing commercial aircraft, cars, buses, boats, trailers, or other commercial vehicles at any time is	Yes

No	Is the Supplier completing this table using the standard six levels?				
Shortage Level (a)	**Demand Reduction Actions**	**How much is this going to reduce the shortage gap?**		**Additional Explanation or Reference** (OPTIONAL)	**Penalty, Charge, or Other Enforcement**
		Volume or Percentage	Shortage Gap Reduction Value		
				prohibited, except at commercial or fleet vehicle or boat washing facilities operated at a fixed location where equipment using water is properly maintained to avoid wasteful use.	
1	Other - Prohibit use of potable water for washing hard surfaces	Percentage	10-50%	Use of potable water for washing buildings, structures, driveways, patios, parking lots, tennis courts, or other hard surfaced areas is prohibited, except in cases where health and safety are at risk.	Yes
1	Water Features - Restrict water use for decorative water features, such as fountains	Percentage	10-50%	Operating a water fountain or other decorative feature that does not use recirculated water is prohibited.	Yes
1	CII - Restaurants may only serve water upon request	Percentage	10-50%	Commercial businesses, including restaurants and other food services providers can only serve drinking water to customers on request.	Yes
1	CII - Lodging establishment must offer opt out of linen service	Percentage	10-50%	Hotel/motel operators must provide guests with the option of choosing not to have towels and linens laundered daily. Information about this option must be prominently displayed.	Yes
1	Other	Percentage	10-50%	Unmetered water from fire hydrants cannot be used for any reason other than fire suppression or Suburban's system maintenance purposes.	Yes
1	Other - Customers must repair leaks, breaks, and	Percentage	10-50%	This loss of potable water may be cited for water waste after a five-day period has passed in which the leak or malfunction could have been corrected.	Yes

No	Is the Supplier completing this table using the standard six levels?				
Shortage Level (a)	**Demand Reduction Actions**	**How much is this going to reduce the shortage gap?**		**Additional Explanation or Reference** (OPTIONAL)	**Penalty, Charge, or Other Enforcement**
		Volume or Percentage	Shortage Gap Reduction Value		
	malfunctions in a timely manner				
1	Other - Prohibit use of potable water for construction and dust control	Percentage	10-50%	There cannot be unreasonable or excessive use of potable water for dust control or earth compaction.	Yes
1	Other - Prohibit vehicle washing except at facilities using recycled or recirculating water	Percentage	10-50%	Operation of commercial car washes that do not recycle the potable water used as required by CWC Sections 10950-10953 is prohibited.	Yes
2	Other - Customers must repair leaks, breaks, and malfunctions in a timely manner	Percentage	Up to 20%	All leaks, breaks, or other malfunctions in the water users' plumbing or distribution system must be repaired within seventy-two (72) hours of notification from Suburban.	Yes
3	Landscape - Limit landscape irrigation to specific days	Percentage	Up to 40%	Watering or irrigating lawn, landscape or other vegetated area with potable water is limited to two (2) days per week.	Yes
3	Landscape - Other landscape restriction or prohibition	Percentage	Up to 40%	Maintenance of vegetation, including trees and shrubs, watered by use of a hand-held bucket or similar container, hand-held hose equipped with a positive self-closing water shut-off nozzle or device is permitted.	Yes
4	Other - Customers must repair leaks,	Percentage	Up to 50% and more	All leaks, breaks, or other malfunctions in the water users' plumbing or distribution system	Yes

No	Is the Supplier completing this table using the standard six levels?				
Shortage Level (a)	**Demand Reduction Actions**	**How much is this going to reduce the shortage gap?**		**Additional Explanation or Reference** (OPTIONAL)	**Penalty, Charge, or Other Enforcement**
		Volume or Percentage	Shortage Gap Reduction Value		
	breaks, and malfunctions in a timely manner			must be repaired immediately upon notification from Suburban unless other arrangements are made with Suburban.	

Table 4 Supply Augmentation and Other Actions for Combined Suburban Service Areas (DWR Table 8-2)

No	Is the Supplier completing this table using the standard six levels?			
Shortage Level (a)	**Supply Augmentation Methods and Other Actions by Water Supplier**	**How much is this going to reduce the shortage gap?**		**Additional Explanation or Reference** (OPTIONAL)
		Volume or Percentage	Shortage Gap Reduction Value	
1	Expand Public Information Campaign	Percentage	10-50%	
1	Other Actions (describe)	Percentage	10-50%	Rebate Programs for plumbing fixtures/devices, and landscape irrigation
NOTES: (a) Above reductions are applicable to all of Suburban's shortage levels (1-4).				

5.3 Catastrophic Supply Interruption Plan

Given the great distances imported water supplies travel to reach the Suburban service areas, the region is vulnerable to interruptions along hundreds of miles of pipelines and other facilities associated with delivering the supplies to the region. Additionally, this water is distributed to customers through an intricate network of pipes and water mains that are susceptible to damage from earthquakes and other disasters, natural or otherwise.

5.3.1 MWD

MWD has comprehensive plans for stages of actions it would undertake to address a catastrophic interruption in water supplies through its WSDM and WSAP Plans. MWD also developed an Emergency Storage Objective to mitigate potential interruption in water supplies resulting from catastrophic occurrences within the Southern California region, including seismic events along the San Andreas Fault. In addition, MWD is working with the state to implement a comprehensive improvement plan to address catastrophic occurrences that could occur outside of the Southern California region, such as a probable maximum seismic event in the Delta that would cause levee failure and disruption of SWP deliveries.

In July 2019, MWD's Board adopted amendments to their Administrative Code allowing deliveries of member agency water supplies in MWD's system during an emergency. With these enabled deliveries, MWD's member agencies will be able to deliver their water through MWD's system under specific emergency conditions. Emergency deliveries using a portion of MWD's system can only be made if MWD is unable to make deliveries to a member agency due to physical damage to its system resulting from a natural disaster or other emergency, and there are no alternatives.

5.3.2 Suburban

Suburban's Catastrophic Supply Interruption Plan (CSIP) details the actions that Suburban will implement during a catastrophic interruption of water supply. A catastrophic interruption could be any event (either natural or man-made) such as regional power outage, earthquake, malevolent acts, and civil unrest that causes a water shortage severe enough to classify as either a Stage 3 or Stage 4 water supply shortage condition. A catastrophic supply interruption differs from a staged drought response discussed above in that catastrophic interruptions occur suddenly and can jeopardize Suburban's water supply.

The actions that Suburban will implement during a catastrophic interruption of water supply are outlined below:

Regional Power Outage

- Isolate areas that will take the longest to repair and/or present a public health threat. Arrange to provide emergency water.
- Establish water distribution points and ration water if necessary.
- If water service is restricted, attempt to provide potable water tankers or bottled water to the area.
- Make arrangements to conduct bacteriological tests, in order to determine possible contamination.
- Utilize backup power supply to operate pumps in conjunction with elevated storage.

Earthquake

- Assess the condition of the water supply system.
- Complete the damage assessment checklist for reservoirs, water treatment plants, wells and boosters, system transmission and distribution.
- Coordinate with California Governor's Office of Emergency Services (OES) utilities group or fire district to identify immediate firefighting needs.
- Isolate areas that will take the longest to repair and/or present a public health threat. Arrange to provide emergency water.
- Prepare report of findings, report assessed damages, advise as to materials of immediate need and identify priorities including hospitals, schools and other emergency operation centers.
- Take actions to preserve storage.
- Determine any health hazard of the water supply and issue any "Boil Water Order" or "Unsafe Water Alert" notification to the customers, if necessary.
- Cancel the order or alert information after completing comprehensive water quality testing.
- Make arrangements to conduct bacteriological tests, in order to determine possible contamination.

Malevolent Acts

- Assess threat or actual intentional contamination of the water system.
- Notify local law enforcement to investigate the validity of the threat.
- Receive notification from public health officials if there is a potential water contamination.
- Determine any health hazard of the water supply and issue any "Boil Water Order" or "Unsafe Water Alert" notification to the customers, if necessary.
- Assess any structural damage from an intentional act.
- Isolate areas that will take the longest to repair and or present a public health threat. Arrange to provide emergency water.

Civil Unrest

- Provide for the safety and welfare of employees.
- Increased awareness shall be maintained by all personnel in all service areas during times of elevated potential for civil unrest.
- A clear delineation of the troubled area(s) shall be determined by the Incident Commander.
- Routine work duties will be suspended in service areas deemed at risk.
- No service personnel shall enter the delineated trouble area on company business without proper authorization or law enforcement escort.
- If at any time during the course of work within a delineated trouble area or any of the service area; a situation appears threatening you must leave the area immediately. Avoid any risk of confrontation.
- Protect company assets.
- Repair of catastrophic main leaks.
- Shut down sheared fire hydrants.
- Periodic visits to critical water facilities.
- Repair critical pumping units and/or system components.
- Provide for maintenance or rapid restoration of water service.
- Provide an implementation of business resumption/remediation plans.

5.4 Seismic Risk Assessment and Mitigation Plan

☑ ***CWC §10632.5***

(a) In addition to the requirements of paragraph (3) of subdivision (a) of Section 10632, beginning January 1, 2020, the plan shall include a seismic risk assessment and mitigation plan to assess the vulnerability of each of the various facilities of a water system and mitigate those vulnerabilities.

(b) An urban water supplier shall update the seismic risk assessment and mitigation plan when updating its urban water management plan as required by Section 10621.

(c) An urban water supplier may comply with this section by submitting, pursuant to Section 10644, a copy of the most recent adopted local hazard mitigation plan or multihazard mitigation plan under the federal Disaster Mitigation Act of 2000 (Public Law 106-390) if the local hazard mitigation plan or multihazard mitigation plan addresses seismic risk.

Earthquakes can vary significantly in magnitude and the amount of damage caused. Major earthquakes can cause loss of electrical power, damage to Suburban's structures and equipment, disruption of service, and injuries to staff. This section provides a description of Suburban's procedures (i.e., response and mitigation) after an earthquake event.

As mandated in CWC Section 10632.5, beginning January 1, 2020, water suppliers are required to include a seismic risk assessment and mitigation plan as part of their WSCP to assess the vulnerability of each of the various facilities of their water system and mitigate those vulnerabilities. If an urban water supplier does not have a seismic risk assessment and mitigation plan, the urban water supplier may instead, per CWC Section 10632.5(c), include a local hazard mitigation plan (LHMP) or a multi-hazard mitigation plan. This requirement is satisfied by the incorporation of elements and analyses from Suburban's Risk and

Resilience Assessment (RRA) and Emergency Response Plan (ERP) for the San Jose Hills and Whittier/La Mirada service areas as well as the inclusion of the 2025 County of Los Angeles All-Hazards Mitigation Plan (attached as **Attachment C**) and elements from the City of Whittier's LHMP. The complete RRA and ERP documents are not presented within this plan due to the highly confidential nature of the reports. Although Suburban does not currently have a Seismic Risk Assessment and Mitigation Plan or a schedule to prepare such a plan, Suburban refers to the 2025 County Los Angeles All-Hazard Mitigation Plan (attached as **Attachment C**).

5.4.1 Seismology of Water Facilities and Vulnerability

According to the maps provided on the California Office of Emergency Services' online planning tool (My Plan) and the California Geological Survey's online earthquake hazards zone application (EQ Zapp) no portion of the systems within the San Jose Hills and Whittier/La Mirada service areas is crossed by a known fault line. Therefore, there are no Suburban potable water structures with an extremely high risk of earthquake damage. There are, however, areas indicated in Suburban's RRAs with increased risk due to nearby faults, including landslides, liquefaction, and some Suburban facilities that are more susceptible to earthquake damage than other facilities.

An earthquake is caused by the shifting of tectonic plates beneath the Earth's surface. Ground shaking from moving geologic plates collapses buildings and bridges, and sometimes triggers landslides, avalanches, flash floods, fires and tsunamis. The strong ground motion of earthquakes has the potential to cause a great deal of damage to drinking water and wastewater utilities, particularly since most utility components are constructed from inflexible materials (i.e., concrete, metal pipes). Earthquakes create many cascading and secondary impacts that may include, but are not limited to:

- Structural damage to facility infrastructure and equipment
- Water tank damage or collapse
- Water source transmission line realignment or damage
- Damage to distribution lines due to shifting ground and soil liquefaction, resulting in potential water loss, water service interruptions, low pressure, contamination and sinkholes and/or large pools of water throughout the service area
- Loss of power and communication infrastructure
- Restricted access to facilities due to debris and damage to roadways

5.4.2 ERP – Earthquake Emergency Response

Suburban prepared an ERP on September 23, 2020 to meet the requirements of America's Water Infrastructure Act of 2018 (AWIA). The ERP provides Suburban staff with the necessary information, strategies, procedures, and mitigation actions to address earthquake emergencies. Per the ERP, after a major earthquake, Suburban staff will notify the Incident Commander (IC) or designated alternate IC. The IC or alternate IC will then make the decision to activate the Emergency Operations Center (EOC) or escalate the event based on the event level. Once the decision to activate the EOC has been made, subsequent notification to the appropriate local government agencies will be made to notify the agency of the threat and the activation of the Suburban EOC.

Once the appropriate local government agencies have been notified of the threat and the Suburban EOC activation, the Suburban EOC designee will provide immediate, specific information to the relevant agencies by pre-designated communication method(s) and be prepared to describe the magnitude and potential impact of the event on public health and safety.

5.4.3 Mitigation Actions

Hazard mitigation may occur during any phase of a threat, emergency, or disaster. Mitigation can and may take place during the preparedness (before), response (during), and recovery (after) phases. The process of hazard mitigation involves evaluating a hazard's impact and identifying and implementing actions to minimize or eliminate the impact.

The following mitigation actions goals established by the County of Los Angeles, the City of Whittier, and Suburban to mitigate seismic risks and vulnerabilities are further described within their respective hazard mitigation plans and ERP.

County of Los Angeles

The goals of the County of Los Angeles All-Hazard Mitigation Plan are based on a risk assessment, representing a long-term vision for hazard reduction or enhanced mitigation capabilities. The four mitigation goals and descriptions are listed below:

1. Protect life, property, infrastructure, the environment, and the economy through equitable mitigation strategies aimed at reducing risks of natural and human-caused hazards.
2. Enhance community-wide partnerships in hazard mitigation across all levels of government, the private sector, and the public.
3. Enhance planning, response, and recovery through hazard identification, assessment, mitigation, and resilience activities.
4. Ensure eligibility for FEMA grant funding to maximize equitable investment in hazard mitigation actions.

City of Whittier

The mitigation actions for earthquake related hazards described in the City of Whittier's 2015 LHMP include, but are not limited to, the following:

1. Prioritize mitigation projects identified in City Plans.
2. Coordinate and integrate natural hazard mitigation activities, where appropriate, with emergency operations plans and procedures.
3. Maintain inventory of critical facilities.
4. Develop a subpage on the emergency management and disaster preparedness website for hazard mitigation. Utilize the website to publicize FEMA's Emergency Management Institute's Independent Study Courses.
5. Maintain land management database in future hazard GIS system for properties in the City.
6. Develop a program to educate the community on the various methods of retrofitting pre-earthquake code designed structures, which would include: workshops, literature and public safety announcements.
7. Install earthquake resistant features on critical infrastructure.

Suburban

After a major earthquake event, Suburban staff will follow the emergency management phases described in the ERP. After the Response Phase and Recovery Phase, Suburban staff will begin review actions to repair damaged water facilities and prepare for future earthquake emergencies.

Termination and review actions include the following:

- Initiate permanent reconstruction of damaged water utility facilities and systems.
- Obtain inspections and/or certifications that may be required before facilities can be returned to service.
- Restore water utility operations and services to full pre-event levels.
- Determine how emergency equipment and consumable materials should be replenished, decontaminated, repaired or replaced.
- Identify operational changes that have occurred as a result of repair, restoration, or incident investigation.
- Document the recovery phase, and compile applicable records for permanent storage.
- Continue to maintain liaison as needed with external agencies.
- Update training programs, the Suburban ERP, and standard operating procedures, as needed, based upon lessons learned during the emergency response and recovery phases of the event.

Existing and planned countermeasures for a regional earthquake include:

- Transmission Main Condition Assessment will be planned to improve the integrity of the transmission mains.
- Main loop system being replaced with earthquake-resistant piping where possible.
- Spare pipe is stored at maintenance facilities to replace localized breaks on their major transmission lines.

Specific seismic mitigation actions/measures are further described in Suburban's ERP.

6 COMMUNICATION PROTOCOLS

☑ ***CWC §10632***

(a) Every urban water supplier shall prepare and adopt a water shortage contingency plan as part of its urban water management plan consists of each of the following elements:

(5) Communication protocols and procedures to inform customers, the public, interested parties, and local, regional, and state governments, regarding, at a minimum, all of the following:

(A) Any current or predicted shortages as determined by the annual water supply and demand assessment described pursuant to Section 10632.1.

(B) Any shortage response actions triggered or anticipated to be triggered by the annual water supply and demand assessment described pursuant to Section 10632.1.

(C) Any other relevant communications.

Suburban's communication protocol includes the various channels that Suburban will utilize to convey critical messages regarding water shortage allocations and voluntary and mandatory actions. A strong communication strategy and a common understanding on the water supply situation and necessary actions between Suburban and its customers, the public, elected officials, and other key stakeholders are essential should the WSCP need to be activated. How the water shortage messages are addressed to the public are described in this communication protocol. The communication protocol will be in place prior to a water supply shortage and be initiated in Stage 2 water supply shortage. Activation of the communication protocol will continue through all subsequent water shortage stages. Suburban will ensure outreach efforts are reaching key audiences as needed.

It is important to communicate to its customers the following when urgent conservation is needed:

- Which shortage stage is being implemented;
- What response actions are triggered to save water;
- Why water needs to be saved; and
- What actions Suburban is taking to respond to the water supply situation.

6.1 Coordination

The goal of Suburban's outreach plans during dry periods and water shortages is to maintain effective coordination with key audiences. In order to maintain reliability in this communication, Suburban will work closely with its Communications Director. During dry periods or other times of limited supply, the frequency and extent of coordination will increase to ensure outreach tactics are consistent with the changing needs of Suburban and its customers. In addition to collaboration with its wholesalers, CBMWD, USGVMWD, and TVMWD, Suburban will seek opportunities with outside organizations and agencies to complement its own outreach.

6.2 Communication Goals

Communication objectives during an existing or anticipated water shortage condition include the following:

- Motivate key audiences (i.e., customers) to increase conservation in following any voluntary or mandatory actions called for at the current stage of the WSCP.
- Raise awareness of the drought, regulations, or other conditions affecting water sources and supplies.
- Educate customers, key stakeholders, elected officials, and the general public about water supply reliability, water quality, and water delivery.
- Prepare customers for any potential escalation of the supply shortage stages.

6.3 Communication Protocol for Current or Predicted Shortage

A current or predicted shortage, as determined by Suburban's Annual Assessment, will be addressed to the public and its customers upon submittal of the Annual Water Shortage Assessment Report to DWR by July 1 of every year. This notice may be conducted by Suburban's website, signage in front of either service area District Office, and coordination with its wholesale agencies.

6.4 Communication Protocol for Shortage Response Actions Triggered or Anticipated to be Triggered

Suburban's customers and public will be notified about any triggered or anticipated to be triggered shortage response actions. Once a Schedule No. 14.1 is activated, Suburban can file a Tier 2 advice letter to the CPUC in order to designate a particular water supply shortage stage of the WSCP under the following circumstances:

1. If Suburban is unable to meet the production limitations as set by governmental and/or court orders under the currently implemented plan level, or
2. If the CPUC, or other government agency, declares an emergency requiring mandatory water use restrictions, or
3. If a government agency declares a state of emergency in response to severe drought conditions, earthquake, or other catastrophic event that severely reduces Suburban's water supply, or
4. If conservation levels set by the CPUC, Suburban, or government agency are insufficient.

The appropriate stage of water conservation and the shortage response action triggered by the stage is then declared in a written notice to every customer via first-class mail at least 30 days before the activation of an enforcement stage. Suburban will provide each customer with the requirements of a particular stage by means of bill insert, bill message or direct mailing, and by message on Suburban's website. Notification will take place prior to imposing any penalties associated with the WSCP.

6.5 Other Relevant Communication Protocols

To reduce water use consumption during any water shortage stage, Suburban will increase its public education and outreach efforts to build awareness of needed actions from the public. Moreover, Suburban will regularly revise its outreach campaign to reflect current supply conditions. Key communication strategies and associated water shortage stage implementation are listed below:

- Keep stakeholders aware of conditions (all Stages).
- Proclaim stage change to key stakeholders and the general public (all Stages).
- Conduct meetings with elected officials and other key civic and business leaders (Stage 2).

- Promote available water assistance resources for vulnerable populations; specialized outreach for impacted industries (Stage 3).
- Encourage reduced optional outdoor use through outreach (Stages 3 and 4).

Suburban may implement these communication strategies through its newsletters, website, and social media platforms to reflect supply conditions. In addition, Suburban may conduct news briefings or other media outlets (i.e., TV, radio, newspapers) to announce changes in supply conditions.

6.6 Crisis Communication Protocols

In the event of a catastrophic supply interruption due to a natural disaster or damage to Suburban's facilities, Suburban will implement communication procedures in accordance with local, regional, state, and federal emergency response guidelines as outlined in its ERP. Depending upon the severity of the emergency and potential damage to Suburban's facilities, Suburban may determine that it is necessary to utilize the Standardized Emergency Management System (SEMS) response and the Incident Command System (ICS). Public information and crisis communication are an integral part of the ICS structure.

In general, communications during an emergency response will proceed along the chain of command of the SEMS/ICS. The number of people notified will increase as the incident expands and decrease as the incident contracts toward its conclusion.

The type and extent of the disaster will dictate the normal and/or alternative methods of communication that will be used. The possibility of a coordinated attack that targets the water, power, and communications systems must be considered. In this case, it would be reasonable to assume that some methods of communication will either be unavailable or limited to certain areas during an emergency. It is anticipated that employees will know upon arrival at their duty stations which communication systems are functional, and which are not. This information will be relayed to the Suburban Information Officer upon discovery.

Suburban uses the ICS for its command structure during water emergencies. The ERP describes the ICS command structure positions and shows which individuals will hold the various positions during different emergency situations (recognizing that at different stages of an event or for different severity of events that the person/position responsible in the ICS changes).

Crisis communication efforts will concentrate on providing information to the public and external audiences. Furthermore, outreach messaging will reflect emergency conditions and the need to focus on health and public safety. Suburban will keep relevant staff informed of incident status and coordinate with public health officials.

Suburban will maintain communication with its wholesalers and its customers. In addition, Suburban may also authorize release of public information to news media to announce conditions and explain needed action. Finally, Suburban will ensure ongoing coordination with emergency response services with daily advisories or alerts as needed.

7 COMPLIANCE AND ENFORCEMENT

☑ ***CWC §10632***

(a)(6) For an urban retail water supplier, customer compliance, enforcement, appeal, and exemption procedures for triggered shortage response actions as determined pursuant to Section 10632.2.

7.1 Penalties

Suburban ensures compliance with and enforces provisions of the WSCP by education and communication programs as described in Section 9 of Suburban's 2025 UWMP, BMP 2 and warnings and citations as described in Tariff Rule No. 14.1. Suburban will first work closely with local law enforcement and public agencies charged with enforcing the mandatory water use restrictions. Usually, violations are reported by neighbors and other customers in the water system. Should the utility find that the local agency is not effectively enforcing the mandatory use restrictions, the utility, after written warnings, such as door hangers and letters, may begin to issue penalties. If a customer is seen violating the water use restrictions, as outlined in Rule No. 14.1 and the Special Conditions below, the customer will be subject to the following penalty structure:

a) **First violation** - Written notice, including explanation of penalty for subsequent violation.

b) **Second violation** - If Suburban verifies that the customer has used potable water for non-essential, wasteful uses after having been notified of the first violation, Suburban shall provide the customer with a second written notice of violation. In addition, Suburban is authorized to take the following actions:

   i. Apply the following waste of water penalties, which are in addition to any other charges authorized by this Schedule No. 14.1 or other Suburban tariffs:

      - If Stage 1 is in effect, $25
      - If Stage 2 is in effect, $50
      - If Stage 3 is in effect, $100
      - If Stage 4 is in effect, $200

c) **Third violation** - If Suburban verifies that the customer has used potable water for non-essential, wasteful uses after having been notified of the second violation, Suburban shall provide the customer with a third written notice of violation. Suburban is authorized to take the following actions:

   i. Apply the following waste of water penalties, which are in addition to any other charges authorized by this Schedule No. 14.1 or other Suburban tariffs:

      a. **First violation** - Written notice, including explanation of penalty for subsequent violation.

      b. **Second violation** - If Suburban verifies that the customer has used potable water for non-essential, wasteful uses after having been notified of the first violation, Suburban shall provide the customer with a second written notice of

violation. In addition, Suburban is authorized to take the following actions:

1. Apply the following waste of water penalties, which are in addition to any other charges authorized by this Schedule No. 14.1 or other Suburban tariffs:
    - If Stage 1 is in effect, $25
    - If Stage 2 is in effect, $50
    - If Stage 3 is in effect, $100
    - If Stage 4 is in effect, $200

c. **Third violation** - If Suburban verifies that the customer has used potable water for non-essential, wasteful uses after having been notified of the second violation, Suburban shall provide the customer with a third written notice of violation. Suburban is authorized to take the following actions:

1. Apply the following waste of water penalties, which are in addition to any other charges authorized by this Schedule No. 14.1 or other Suburban tariffs:
    - If Stage 1 is in effect, $25
    - If Stage 2 is in effect, $50
    - If Stage 3 is in effect, $100
    - If Stage 4 is in effect, $200

d. **Fourth violation** - If Suburban verifies that the customer has used potable water for non-essential, wasteful uses after having been notified of the third violation, Suburban shall provide the customer with a fourth written notice of violation. In addition to actions set forth in previous violations prescribed above, Suburban is authorized to install a flow restrictor on the customer's service line. Suburban shall not be held liable for any injuries, damages, and/or consequences arising from the installation of a flow restrictor.

e. **Egregious violation** - After providing the customer with one notice of egregious violation, either by direct mail or door hanger, which documents the egregious use of potable water for non-essential, wasteful uses and explains that failure to correct the violation may result in the installation of a flow restrictor on the customer's service line, Suburban shall not be held liable for any injuries, damages, and/or consequences arising from the installation of a flow restrictor.

The money collected from penalties will be accounted for in a balancing account for later disposition as ordered by the CPUC, which would typically result in all amounts being refunded to customers. Amounts refunded may be partly offset by Suburban's conservation costs charged to a memorandum account.

7.2 Drought Rate Structures and Surcharges

Suburban provides drought surcharge rates for residential metered service customers as shown on page 6 of Tariff Schedule No. 14.1 in **Attachment B**. The surcharge rates are only applied in Stages 2, 3, and 4. The rates vary by stage, meter size, and non-low income customer versus low income customer.

7.3 Enforcement

From second violation of the same restriction within a one-year period and onwards, a violation letter will be posted on the property and mailed to the billing address, if different from the service address. Violations will accrue for the period of one year and be considered corrected and expunged one year after the violation occurs. The purpose of this rule is to prevent discrete violations from accruing in the event of a multi-year enforcement of the WSCP.

8 LEGAL AUTHORITIES

☑ ***CWC §10632 (a)(7)***

(A) A description of the legal authorities that empower the urban water supplier to implement and enforce its shortage response actions specified in paragraph (4) that may include, but are not limited to, statutory authorities, ordinances, resolutions, and contract provisions.

(B) A statement that an urban water supplier shall declare a water shortage emergency in accordance with Chapter 3 (commencing with Section 350) of Division 1.

(C) A statement that an urban water supplier shall coordinate with any city or county within which it provides water supply services for the possible proclamation of a local emergency, as defined in Section 8558 of the Government Code.

☑ ***CWC Section Division 1, Section 350***

Declaration of water shortage emergency condition. The governing body of a distributor of a public water supply, whether publicly or privately owned and including a mutual water company, shall declare a water shortage emergency condition to prevail within the area served by such distributor whenever it finds and determines that the ordinary demands and requirements of water consumers cannot be satisfied without depleting the water supply of the distributor to the extent that there would be insufficient water for human consumption, sanitation, and fire protection.

Under California law, including CWC Chapter 3 (commencing with Section 350) of Division 1, Parts 2.55 and 2.6 of Division 6, Division 13, and Article X, Section 2 of the California Constitution, Suburban shall implement the water shortage response actions outlined in this section with authorization of the CPUC. In all water shortage cases, shortage response actions to be implemented will be at the discretion of Suburban and will be based on an assessment of the supply shortage, customer response, and need for demand reductions.

It is noted that upon proclamation by the Governor of a state of emergency under the California Emergency Services Act, Chapter 7 (commencing with Section 8550) of Division 1 of Title 2 of the Government Code, based on drought conditions, the state will defer to implementation of locally adopted water shortage contingency plans to the extent practicable. Suburban will coordinate with any city or county within which it provides water supply services for the possible proclamation of a local emergency, as defined in Section 8558 of the Government Code.

9 FINANCIAL CONSEQUENCES OF A WSCP

☑ ***CWC §10632***

(a)(8) A description of the financial consequences of, and responses for, drought conditions, including, but not limited to, all of the following:

(A) A description of potential revenue reductions and expense increases associated with activated shortage response actions described in paragraph (4).

(B) A description of mitigation actions needed to address revenue reductions and expense increases associated with activated shortage response actions described in paragraph (4).

(C) A description of the cost of compliance with Chapter 3.3 (commencing with Section 365) of Division 1. [retail urban suppliers only]

Suburban is an investor-owned water utility and is regulated by the CPUC. When the Governor proclaims a Drought State of Emergency for water rationing, and Suburban's Tariff Rule 14.1 is activated, the company may request to add to its preliminary statement a Drought Lost Revenue Memorandum Account (DLRMA) to track lost revenue associated with reduced sales as a result of activating Rule 14.1.

9.1 Uses of Financial Reserves

Non-governmental entities such as Suburban typically do not maintain reserves as is commonly used in governmental utilities.

9.2 Other Financial Management Mechanisms

☑ ***CWC §10632***

(a)(8)(C) A description of the cost of compliance with Chapter 3.3 (commencing with Section 365) of Division 1.

Like other investor-owned utilities, in downturns such as droughts, Suburban prudently manages its business to reflect revised circumstances. Suburban's commitment to making needed infrastructure improvements typically remains steadfast even in times of drought.

10 MONITORING AND REPORTING

☑ ***CWC §10632***

(a)(9) For an urban retail water supplier, monitoring and reporting requirements and procedures that ensure appropriate data is collected, tracked, and analyzed for purposes of monitoring customer compliance and to meet state reporting requirements.

When the WSCP is in effect, Suburban determines the actual reduction in water use through metering. Data from production meters and from customer usage meters is used to analyze the water conservation impacts during shortages. Additionally, customers can track their usage as recorded on their monthly water bill.

11 WSCP REFINEMENT PROCEDURES

☑ ***CWC §10632***

(a)(10) Reevaluation and improvement procedures for systematically monitoring and evaluating the functionality of the water shortage contingency plan in order to ensure shortage risk tolerance is adequate and appropriate water shortage mitigation strategies are implemented as needed.

This section discusses the process for reviewing and updating the WSCP to ensure it remains actively used, relevant and appropriate to the community, and consistent with applicable state requirements. It is vital that Suburban's WSCP remain up to date so as to best ensure shortage risk tolerance is adequate, appropriate water shortage mitigation strategies are implemented as needed, proper procedures for water efficient practices are in place for the community, and better alignment with long-term water use goals.

The Suburban Water Management is responsible for maintaining this plan and updating it as needed. The Water Production Manager is the primary Suburban staff member who will carry out this process. In addition, the Water Production Manager, or their designee, will serve as the WSCP project manager and will coordinate maintenance of the plan, conduct the formal review process, and direct the plan updates with the assistance of the Water Conservation Manager. The project manager will assign tasks, which may include collecting data, developing new or updated water shortage mitigation measures, updating sections of the plan, and presenting the plan to others.

12 SPECIAL WATER FEATURE DISTINCTION

☑ ***CWC §10632***

(b) For purposes of developing the water shortage contingency plan pursuant to subdivision (a), an urban water supplier shall analyze and define water features that are artificially supplied with water, including ponds, lakes, waterfalls, and fountains, separately from swimming pools and spas, as defined in subdivision (a) of Section 115921 of the Health and Safety Code.

As required under CWC 10632(b), water features that are not pools or spas must be analyzed and defined separately from pools and spas in the WSCP. Non-pool or non-spa water features may use recycled water, whereas, for health and safety considerations, pools and spas must use potable water. Presently, Suburban provides recycled water in the San Jose Hills Service Area, but not within the Whittier/La Mirada Service Area. Although the Whittier/La Mirada Service Area does not currently use and does not have the ability to use recycled water due to a lack of infrastructure, the Whittier/La Mirada Service Area would use non-potable water for non-pool water features if and when recycled water supply ever becomes available. Furthermore, the WSCP requires potable water recirculation for fountains and decorative water features.

13 PLAN ADOPTION, SUBMITTAL, AND AVAILABILITY

☑ ***CWC §10632***

(c) The urban water supplier shall make available the water shortage contingency plan prepared pursuant to this article to its customers and any city or county within which it provides water supplies no later than 30 days after adoption of the water shortage contingency plan.

☑ ***CWC §10642***

…Prior to adopting either [UWMP and WSCP], the urban water supplier shall make both the plan [UWMP] and water shortage contingency plan available for public inspection and shall hold a public hearing or hearings thereon…After the hearing or hearings, the plan [UWMP] or water shortage contingency plan shall be adopted as prepared or as modified after the hearing or hearings.

☑ ***CWC §10640***

(b) …The supplier shall likewise periodically review the water shortage contingency plan as required by paragraph (10) of subdivision (a) of Section 10632 and any amendments or changes required as a result of that review shall be adopted pursuant to this article [Article 3 Sections 10640 -10645]

☑ ***CWC §10644***

(a)(2)(b) If an urban water supplier revises its water shortage contingency plan the supplier shall submit to the department a copy of it water shortage contingency plan prepared pursuant to subdivision (a) of Section 10632 [required elements of a WSCP] no later than 30 days after adoption, in accordance with protocols for submission and using electronic reporting tools developed by the department.

To encourage broad community participation in the WSCP preparation process, Suburban provided 60-day notification letters to cities and counties within Suburban's service areas. Copies of the draft WSCP were made available online prior to the public hearing. Shortly before the public hearing, a two-week and a one-week notice was published in the local press alerting the public of the public hearing and adoption held on June 17, 2026. **Attachment A** contains the resolution adopting the WSCP. The final plan was submitted to DWR within 30 days of adoption and includes all information necessary to meet the requirements of CWC Section 10632.

Suburban's approved WSCP was filed with DWR by the July 1, 2026 deadline. Suburban's plan was also submitted to the California State Library, and cities and counties within its service areas. Suburban made the plan available for public review no later than 30 days after filing with DWR.

14 REFERENCES

City of Whittier, 2026. Hazard Mitigation Plan Update. https://mitigatehazards.com/whittier-hmp/whittier-documents/.

County of Los Angeles, 2025. All-Hazards Mitigation Plan. https://ceo.lacounty.gov/wp-content/uploads/2025/10/Final-2025-LA-County-AHMP-Base-Plan-Signed.pdf.