

Pennsylvania

Water loss is an important issue in Pennsylvania, where approximately 73% of the population is served by public water suppliers. The US Geological Survey (USGS) estimates that in 2015 (the most recent year available), Pennsylvania's public water suppliers withdrew an average of about 1,391.7 million gallons of water per day for treatment and distribution to customers. Those public water suppliers face enormous challenges when it comes to replacing and repairing their systems. The U.S. Environmental Protection Agency (EPA) recently found a 20-year capital improvement need of more than \$16.77 billion for Pennsylvania's water systems to continue to provide safe drinking water.

The Pennsylvania Public Utilities Commission (PUC) regulates approximately 80 private water companies that operate several hundred systems in the State. As of 2012, PUC requires all Class A water utilities (over \$1,000,000 in annual revenues) to file annual water audit summaries, using the AWWA methodology. PUC regulations, however, still include the following "policy statement" concerning UAW "Levels of unaccounted-for-water should be kept within reasonable amounts. Levels above 20% have been considered by the Commission to be excessive." The PUC put forth a proposal in early 2013 to update its regulations to incorporate the AWWA standard terminology, but it has not acted on the proposal.

The Pennsylvania Department of Environmental Protection (DEP) regulates all public water suppliers, but does not require use of the AWWA audit methodology. It requires submission of an Annual Water Supply Report form, which requests data on "water losses." The form defines water loss as "the difference between the water produced and the water used by customers," and which "include[s] both real and apparent losses." DEP appears not to provide any further guidance or requirements for submission of water loss information.

Delaware River Basin Commission Requirements

While Pennsylvania has not adopted water loss auditing requirements, Philadelphia and other water systems in eastern PA have prepared and submitted annual water audit reports under regulations of the Delaware River Basin Commission, a regional agency formed by interstate compact and made up of representatives of Delaware, New Jersey, New York, Pennsylvania, and the US Government. In 2009, the DRBC added a requirement to its Water Code (section 2.1.8) that all utilities located in the Delaware River Basin submit annual water audits beginning in 2012 using the AWWA Free Water Audit Software.

The Great Lakes-St. Lawrence River Basin Water Resources Compact

Pennsylvania is one of eight states that border the Great Lakes, which comprise more than one-fifth of the world's surface supply of freshwater and more than 95 percent of the surface freshwater supply in the U.S. Management and use of water in the Great Lakes states is governed by the Great Lakes–St. Lawrence River Basin Water Resources Agreement and Compact. In ratifying the Compact, each state agreed to undertake a series of actions, including the establishment of thresholds governing new or

increased withdrawals of water and development of water conservation and efficiency programs. The implementation of a water loss accounting program can help Pennsylvania comply with the water conservation and efficiency requirements of the Compact.

New Report: Evaluation of Water Audit Data for Pennsylvania Water Utilities-

<https://www.nrdc.org/resources/report-evaluation-water-audit-data-pennsylvania-water-utilities>

U.S. Geological Survey's "Estimated Use of Water in the United States County-Level Data for 2015", September 28, 2017- <https://www.sciencebase.gov/catalog/item/59a96d18e4b07e1a023db323>

EPA's "Drinking Water Infrastructure Needs Survey and Assessment, Sixth Report to Congress", March 2018 - https://www.epa.gov/sites/production/files/2018-03/documents/sixth_drinking_water_infrastructure_needs_survey_and_assessment.pdf

PA DEP Annual Water Supply Report form –

https://www.dep.state.pa.us/dep/deputate/watermgmt/wc/3920_FM_WM0009_21228.pdf

PA PUC Regulations -52 Pa. Code §65.20(4) -

<http://www.pacode.com/secure/data/052/chapter65/s65.20.html>

PA PUC audit requirements are summarized in the PUC's "Advance Notice of Proposed Rulemaking Order; Water Conservation Measures," 43 Pa. Bulletin 870 (Feb. 9, 2013) -

<http://www.pabulletin.com/secure/data/vol43/43-6/231.html>

"Great Lakes Facts and Figures" -- great-lakes.net/lakes/ref/lakefact.html

"Protecting a Shared Future: Assessing and Advancing the Sustainable Management of the Great Lakes Through Water Conservation and Efficiency"-- nrdc.org/water/files/greatlakescompact.pdf

Delaware River Basin Commission –

"Analysis of Calendar Year 2012 Water Audit Data from Public Water Supply Systems in the Delaware River Basin." February 2015.

<http://www.state.nj.us/drbc/library/documents/wateraudits/CY2012audit-report.pdf>

"Analysis of Calendar Year 2014 Water Audit Data from Public Water Supply Systems in the Delaware River Basin." February 2016.

<http://www.state.nj.us/drbc/library/documents/wateraudits/CY2014audit-report.pdf>