

Making Conservation a California Way of Life

Requesting Approval of Alternative Data Sources

Introduction

This guidance document helps water suppliers request approval for various alternative data sources under the Making Conservation a California Way of Life regulatory framework and Urban Water Use Reporting. It provides a detailed explanation of the minimum requirements, the process for approval, and considerations for supplier staff resources.

A supplier may, for each reporting year, use an alternative data source for reference if it demonstrates to the Department of Water Resources (DWR), in coordination with the State Water Board, that the data are equivalent, or superior, in quality and accuracy to the data provided by the DWR.

Before requesting approval for alternative data sources, it is recommended to first determine if the supplier can meet its Urban Water Use Objective using the standard data. Exploring all possibilities with the available standard data can help streamline compliance efforts, save money, and ensure that the alternative data request is truly necessary for achieving your objectives.

This document includes the following Sections:

1. Types of Alternative Data Sources and Request Process
2. General Documentation Requirements for All Alternative Data Sources
3. Public Process Requirement for Alternative Data Approval
4. Submitting Alternative Data Request
5. Approval Process
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Section 1: Types of Alternative Data Sources and Request Process

Water suppliers may request approval for several types of alternative data sources. Request for approval of an alternative data source can be made either separately for each type of data or combined.

When documenting the use of alternative data sources, it is essential to provide detailed information on each data type. Additional details can be obtained by referring to DWR's "[Recommendations for Guidelines and Methodologies for Calculating Urban Water Use Objective \(Report No. WUES-DWR-2021-01B\)](#)" document or by contacting DWR staff at WUEStandards@water.ca.gov.



UWUO Components That Can Use Alternative Data

Below are the categories of data that a supplier may request alternative data for, along with key details to include in the write-up:

1. Residential Landscape Area Measurement – Irrigable Irrigated (968.b.4)

- Key Consideration: If using alternative data for measuring landscape area, the 20% buffer for “Irrigable but not Irrigated” land won’t apply.
- Documentation: Explain the alternative method used, the source of data, and how it improves precision. Include GIS maps, aerial imagery, or field surveys.

2. Reference Evapotranspiration (ET) Data (968.b.4; 969.b.3)

- Key Consideration: Alternative ET data must be reliable and locally relevant.
- Documentation: Provide the source (satellite, weather stations, or other sensors), calculation models used, and validation studies that prove the data’s accuracy in reflecting local conditions.

3. Effective Precipitation Data (968.b.4; 969.b.3)

- Key Consideration: Precipitation data helps adjust water budgets for irrigation efficiency.
- Documentation: Include the source of precipitation data, frequency of updates, and any adjustments for local variances in precipitation. Ensure it accounts for effective rainfall, not just total precipitation.

4. Square Footage of Existing Pools, Spas, and Similar Water Features (968.c.3)

- Key Consideration: Accurate measurement of pool/spa square footage is required for calculating water budgets.
- Documentation: Provide satellite or drone imagery, ground surveys, or municipal records to verify the measurements.

5. Precipitation Data (968.g.6A)

- Key Consideration: This data informs both water supply planning and efficiency measures.
- Documentation: Include historical and current precipitation data, methods used to collect it (sensors or weather stations), and any calibration done for accuracy.

6. Horse Corrals/Arena Landscape Area Measurement (968.g.2A)

- Key Consideration: This is specific to certain water use types, and measurement accuracy is critical for managing outdoor water use.
- Documentation: Provide detailed maps and measurement tools used for horse corral areas, including whether manual measurements or remote sensing was used.



Section 2: General Documentation Requirements for All Alternative Data Sources

1. Source Identification: Clearly identify the alternative data source, such as satellite providers, weather stations, or third-party vendors.

- What UWUO Component (listed above) are you requesting the use of alternative data for?
- What are the limitations to the currently approved data source?

2. Methodology: Describe how the alternative data was collected and processed. For example, if using remote sensing, provide details on satellite resolution, processing algorithms, and ground-truthing methods.

3. Comparison with Approved Data: Explain why the alternative data is being used instead of standard methods and how it meets or exceeds the accuracy and quality of DWR data sources.

- How does the alternative data source address the limitations described above?

4. Validation and Verification: Include validation studies or peer-reviewed documentation to prove the reliability of the alternative data. Where applicable, demonstrate consistency between the alternative data and standard methods used in water conservation practices.

5. Data Reporting Format: Ensure the alternative data is presented in a format compatible with DWR's reporting systems (e.g., CSV, GIS-compatible files).

6. Other Documentation

- Include the name, provider, and contact information for the data source.
- Cost spent on new data source

By following these documentation standards, water suppliers can ensure that alternative data sources are reliable, valid, and compliant with DWR regulations.

Section 3: Public Process Requirement for Alternative Data Approval

According to the DWR's [2021 Alternative Data Guidance](#), any use of alternative data must go through a public process. While the public process is not strictly defined, suppliers have flexibility in how they choose to meet this requirement. However, the following minimum requirements must be fulfilled:

1. Public Access and Review Period: The alternative data must be made available to the public for a minimum of two weeks. This should include posting the data on the supplier's website and ensuring the public can access and review the information.



2. Announcement: An official announcement must be made to inform the public that the data is available for review. This announcement initiates the two-week review period.

3. Method for Receiving Comments: Suppliers should provide a clear method for the public to submit comments, such as an online form or a designated email address.

4. Documenting Public Input: While suppliers are not required to respond to the comments received, they must capture and provide them to DWR as part of the application package.

As part of the application, the supplier must include the following:

- Proof of the announcement (e.g., screenshot or copy of the notification).
- Proof that the data was published on the website (e.g., webpage URL or screenshot).
- Copies of all comments received during the public review period.

This ensures that the process is transparent, and that public input is appropriately documented for DWR's review.

Examples of How a Supplier Could Meet the Public Process Requirement

A supplier only needs to implement one method to satisfy the public process requirement. Below are four DWR-accepted methods, but they do not capture all possible public process options:

1. Social Media Announcement and Online Comment Form

A supplier could post an announcement on all their social media platforms, such as Facebook, Twitter, and LinkedIn, with a direct link to the alternative data hosted on their website. The post should include a brief description of the data and specify that it is available for public review for a two-week period. The announcement would also provide a link to a Google Form or similar online tool where the public can easily submit their comments. This approach reaches a broad audience and allows for convenient electronic submission of feedback.

2. Digital Newsletter Announcement with Email for Comments

Suppliers who regularly send out digital newsletters to their customers can include an announcement. The newsletter would contain a summary of the data available for review, a direct link to where it can be accessed online, and the start and end dates for the public comment period. The supplier can also provide a dedicated email address for submitting comments. This method leverages existing communication channels and ensures that customers who subscribe to updates are informed.



3. Flyer Included with Customer Bills

For suppliers who send physical bills to customers, a printed flyer can be included as an insert in the monthly billing statement. The flyer should explain that the supplier is using alternative data, provide information on how and where customers can view the data, and specify a postal address or email address for sending comments. This approach ensures that customers who prefer paper communication are equally informed and have an opportunity to provide input.

4. Newspaper Posting with Comment Instructions

Suppliers can publish a formal announcement in a local newspaper, especially one that is widely read within their service area. The announcement should include a summary of the alternative data, where it can be accessed (e.g., website URL or physical location), the duration of the review period, and methods for submitting comments (such as email or postal address). This traditional approach helps reach community members who may not use digital platforms or social media.

Section 4: Submitting Alternative Data Request

Water suppliers submitting alternative data to DWR must follow the process outlined below:

1. **Email Submission:** Send the alternative data request to **WUEStandards@water.ca.gov**.
 - **Subject Line Format:** Include “ALTERNATIVE DATA REQUEST: [Supplier Name]” in the subject line of the email.
 - **Large Files:** If the data files are too large to attach directly, include a link or FTP site for DWR to access the files.
2. **Approval Process:** Once submitted, DWR will review the alternative data. If approved, DWR will update its internal data tables, and the data will become public upon inclusion in DWR’s official records.
3. **Required Documentation:** The following must be included with the submission:
 - **Write-Up:** A detailed explanation of the alternative data and its intended use.
 - **Data Files:** All relevant data files in the appropriate format.
 - **Back-Up Support Documentation:** Any supporting documents or references that justify the alternative data's use and validity.
 - **Proof of Public Process:** Documentation of the public process followed to share the alternative data. This should include proof of the public announcement (e.g., screenshots or newspaper clippings), proof of posting on the supplier’s website, and a compilation of comments received during the two-week public review period.
4. **Affidavit or Certification:** A signed affidavit or certification confirming that the alternative data meets the minimum regulatory requirements. This document must be signed by a representative, who has signing authority, for the urban retail water supplier.



Section 5: Approval Process

1. Timeline:

- **BEST PRACTICE:** Requests for Alternative Data sources are typically reviewed from July 1 to September 30 each year. To ensure your data is considered in time, it is recommended to submit requests within this window. Any requests submitted after October 1 may not be reviewed and approved in time for inclusion by January 1 of the following year.
- DWR aims to review requests within 60 days. However, this timeline may be extended depending on the complexity of the request and the volume of submissions.

2. Review Process:

- DWR will evaluate the relevance, accuracy, and adequacy of the alternative data submitted. The review will ensure that data meets the necessary accuracy requirements and is a suitable alternative to DWR provided data.
- If revisions are needed, DWR will provide feedback outlining necessary changes or additional information required. Suppliers will have the opportunity to address the feedback and resubmit their data for consideration.

3. Final Decision:

- DWR will provide an official approval or denial of the alternative data request. An explanation will be included to clarify the decision and, if applicable, provide guidance on any additional steps the supplier needs to take.
- Once approved, DWR will update the relevant data tables, and the approved alternative data will automatically populate into the appropriate records, making it publicly accessible.

Section 6: Validity and Revalidation

Once an alternative data source is approved, it remains valid for a period of five years. During this time, suppliers are required to submit annual updates.

Each annual update must include:

- An affidavit signed by a representative with the signing authority, certifying that the supplier is still using the approved alternative data source and that the data meets the minimum regulatory requirements.
- Updated data files for that year, as applicable.

Public process documentation is not required for annual updates within the five-year validity period.

Revalidation:

Prior to the five-year expiration, suppliers must undergo a public process and submit a formal revalidation request if they wish to continue using the approved alternative data source.



The revalidation request should include:

- Updated data reflecting any changes or additions since the initial approval.
- A summary of how the data has been used over the past five years to support water use objectives and compliance.
- Proof of public process, including an announcement, public access and comment period, and any comments received during the review period.

Once the revalidation request is reviewed and approved by DWR, the alternative data source will be valid for an additional five years.

Section 7: Why Alternative Data May Be Necessary

The flexibility to use alternative data is essential for water suppliers facing unique challenges, such as outdated standard sources, regional differences in water use, or technological advancements that offer more precise data. This ensures that conservation efforts remain robust while accommodating diverse needs across various service areas.

Conclusion

The alternative data source documentation should not only meet regulatory compliance but also provide a clear pathway for how the data will be integrated into ongoing water management practices. Suppliers must demonstrate that the alternative data is reliable, validated, and offers clear benefits over standard methods while ensuring efficient use of resources. By adhering to these documentation standards, water suppliers can facilitate the approval process and ensure the long-term applicability of the alternative data.

For general inquiries about the alternative data submission process or if you are unsure whom to contact, please email WUEStandards@water.ca.gov