



**Delaware River Basin Commission**

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L-2012-2319361

April 12, 2013

Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Dear Sir or Madam:

I am writing to provide comments to the proposed rulemaking for Section 65.20 of the Pennsylvania Code – Water Conservation Measures, Subsection 4 *Unaccounted-for Water*.

In 2009, the Delaware River Basin Commission (DRBC) amended its Comprehensive Plan and Water Code to implement an updated water audit approach to identify and control water loss in the Basin. The new approach is consistent with the International Water Association (IWA) and American Water Works Association (AWWA) Water Audit Methodology that is considered a best management practice in water loss control. A water audit is required from all public water suppliers within the Delaware River Basin who have been issued approvals by the DRBC to withdraw and use in excess of 100,000 gallons per day of water during any 30 day period. In March of this year, after an extensive outreach effort, the first round of annual water audits were submitted to DRBC. For reference the pertinent sections of the DRBC Water Code can be found here: [http://www.state.nj.us/drbc/library/documents/wateraudit\\_watercode-excerpt.pdf](http://www.state.nj.us/drbc/library/documents/wateraudit_watercode-excerpt.pdf). In developing proposed regulations, the PUC may wish to acknowledge that DRBC has regulations requiring a submission of annual water audits in the IWA/AWWA format to demonstrate confidence in the methodology, in planning and regulatory contexts.

The DRBC is very pleased that the PA Public Utility Commission (PUC) has similarly adopted requirements for water utilities to submit annual water audits in the format of the IWA/AWWA water audit methodology; and specifically using the AWWA Free Water Audit Software© as the data collection tool. One benefit of the use of the AWWA software is that regulated systems reporting to both DRBC and the PUC will use the exact same reporting format. AWWA has also made available tools to manage the water audit data and these are being successfully used by DRBC.

David Sayers of my staff has been active in introducing the IWA/AWWA water audit methodology to the PUC and has provided input and guidance via participation in several meetings during the water audit pilot program conducted by the PUC. David is also a member of the AWWA Water Loss Control Committee. Based on the findings of the PUC pilot program and our own experience the DRBC recommends that training (e.g., workshops) are provided by the PAPUC to help educate utility staff on the workings of the IWA/AWWA water audit.

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Traditionally, performance indicators for measuring water loss have focused on percentage based indicators. The DRBC has not revised its performance benchmarks for water loss based on the new methodology at this time, although it may do so in future years based on data gathered through its own program and other water audit programs. In the first few years of implementation, DRBC will place a focus on the validation of audit results rather than the absolute water loss performance levels. I would recommend that the PUC similarly develop knowledge within its auditing staff to validate the water audit data.

I believe the DRBC and PUC are demonstrating leadership by adopting the IWA/AWWA water audit methodology as a regulatory requirement. I encourage the two Commissions to work together, sharing resources and expertise as appropriate. I am confident that our efforts will achieve multiple benefits including preserving water resources, improving infrastructure reliability, limiting water losses and improving overall system efficiency.

Thank you for the opportunity to provide comments to this proposed rulemaking.

Very truly yours,



Carol R. Collier  
Executive Director

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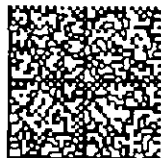
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