

Neighbors working together to ensure Big Lagoon Community Service District's water needs are met today, tomorrow, and into the future.

BIG LAGOON COMMUNITY SERVICES DISTRICT

PO Box 847 Trinidad, CA 95570 <u>boardsecretary@biglagooncsd.org</u> **Public Hearing AGENDA**

The Board of Directors of Big Lagoon CSD will hold a Public Hearing to be held on Saturday, July 15,2023 at 09:30 a.m. in the Big Lagoon Elementary School Gymnasium.

How Can I Participate? Written protests will be accepted by regular mail at P.O. Box 847, Trinidad, CA 95570. Emailed or faxed protests will NOT be accepted.

The content of the protest should include:

- Printed name of protestor
- Clear indication that the document is a protest
- Residence or business address or parcel number (APN) within the BLCSD service area
- Signature of protestor

Any Property Owner and or Customer may appear at the Public Hearing and orally protest the proposed rate increases, or submit to BLCSD, at any time before the end of the Public Hearing, a written protest the proposed rate increases. Oral protests will not qualify as a protest unless accompanied by a written protest, but the Board of Directors welcomes input from the community during the Public Hearing. Copies of all protests submitted by 12 Noon on July 13,2023 will be available at the Public Hearing.

1. Chair's Call to Order (Greg)

Please address all public comments to the full Board. Per the Rules of Parliamentary Procedure members of the public do not engage in discussions or dialogues with the governing Board. The purpose of public comments is to inform the Board about your views. Public Participants are invited to address the Board at the start of the

meeting, and at the start of every Agenda Item. There will be a **time limit of three** (3) minutes per person per Item. Any discussion of an Agenda Item will involve Board members only. Having the public comment before an Agenda Item gives a Board or Staff member the opportunity to incorporate the public's concerns in their report if they choose to do so.

- 2. Proposed Rate Increases as documented in the Public Hearing Notice (Addendums 1&2) Greg
- 3. Review of Public written comments.
- 4. Public comment in regards to proposed rates.
- 5. Board discussion.
- 6. Tabulation of written protests.
- 6. Adjourn

Addendum #1- Notice of Public Hearing Addendum #2- Rate survey spreadsheets



PO BOX 847 Trinidad, CA 95570

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NOTICE OF PUBLIC HEARING PROPOSED SERVICE AND WATER RATE INCREASES

NOTICE IS HEREBY GIVEN that the Big Lagoon Community Services District (BLCSD) is considering a water rate and service charge Increase. The hearing will take place at 9:30 AM on Saturday July 15,2023 at the Big Lagoon School gymnasium. 269 Big Lagoon Park Rd, Trinidad, CA 95570. You are receiving this Notice because our records indicate that you are a water customer and/or a owner of a property within the BLCSD. This Notice describes the proposed increase and explains how you can participate in the rate setting process.

The BLCSD Board of Directors will consider the rate increases immediately following the public hearing on July 15,2023. If adopted, the increased rates will become effective, September 01,2023 and be reflected in the November 2023 bills.

The public hearing will be conducted per California Constitution Article XIII D, Section 6 (also known as "Proposition 218"). This notice is being sent to all owners and customers of record whose parcels receive water service from BLCSD who would be subject to the proposed rates and charges.

The term "Property Owner" and/or "Customer" as used in this Notice includes any affected person or entity that has a right to lawful possession and/or occupancy of property and who is responsible for payment of the water service charges. The Public Hearing will be for hearing public testimony and receiving written protests on the proposed rate increase. Only one protest per parcel is permitted. Please refer to the "How Can I Participate?" section of this document for instructions on submitting a formal written protest against the proposed action. You may also appear at the Public Hearing at 9:30 AM on Saturday July 15,2023.

What would change? The proposed increase would increase the fixed bi-monthly service charge, and water usage charges. Information of the changes can be found in this notice under "Proposed Rate Changes".

Why are these increases necessary?

- Growing operation & maintenance costs
- Water Operator cutting back on hours/retirement. These services will need to be outsourced at a fee vs. currently at no charge to the District.
- Capital improvements are necessary to continue to provide safe, reliable, high quality water to the community.

Proposed Rate Changes: (monthly)

<u>Current Rat</u>	es As of 7/01/2015	Proposed as of 09/01/2023
Base Rate 1	\$47.49	\$54.61
Base Rate 2	\$127.99	\$147.19
Water usage per gallon	\$.004799	\$.005519
Water Meter Connection	\$5000	\$5000

How will this increase affect me? A typical user (3000 gallons per month) would see an approximate increase of \$18.57 in their bi-monthly bill (or \$9.28 per month).

How Can I Participate? Written protests will be accepted by regular mail at P.O. Box 847, Trinidad, CA 95570. Emailed or faxed protests will NOT be accepted.

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- Printed name of protestor
- Clear indication that the document is a protest
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Any Property Owner and or Customer may appear at the Public Hearing and orally protest the proposed rate increases, or submit to BLCSD, at any time before the end of the Public Hearing, a written protest against the proposed rate increases. Oral protests will not qualify as a protest unless accompanied by a written protest, but the Board of Directors welcomes input from the community during the Public Hearing. Copies of all protests submitted by 12 Noon on July 13,2023 will be available at the Public Hearing.

If written protests are submitted by a majority of the Property Owners/Customers of affected properties, the proposed increases will not be imposed.

			BLCSD Rate Comparis	on April 2023			
<u>District</u>	Monthly Fee	Monthly Fee	Water cost per gal		Comparison \$ Cost per 1000 gal	Notes	
	Base Rate 1	Base Rate 2					
BLCSD	\$47.49	\$127.99	\$0.004799		\$4.80	In Effect since July 1,2015	
Westhaven	\$61.71		\$0.015990		\$15.99	7% increase is slated for both hookup and water	
Orick	\$57.00					Base includes 2,244 gallons	
Orick			\$0.004010	Gallons over 2,244	\$4.01		
Mckinleyville CSD	\$28.39	\$131.63	\$0.003302	Tier 1 5,985/gal/month	\$3.30		
Mckinleyville CSD			\$0.004438	Tier 2 usage over 5,985	\$4.44		
Humboldt CSD	\$38.42	\$122.13	\$0.005427		\$5.43		
City of Trinidad	\$52.45		\$0.006857		\$6.86	Within City Limits-2.5% increase annually	
City of Trinidad	\$65.57		\$0.008582		\$8.58	Outside City Limits-2.5% increase annually	
Fieldbrook Glendale CSD	\$57.55	\$144.63				Base rate includes 3,741 gallons	
Fieldbrook Glendale CSD			\$0.004197	Gallons over 3,741	\$4.20		
						BLCSD has a 2 month billing cylce- Estimated \$ Increase	Per Hook-up
Potential Rate Increase			Comparative			2 Month base \$ increase + est 3000 gal/mth usage \$ inc	Est. Annual Impact
BICSD at 2.5% Increase	\$48.68	\$131.19	\$0.004919		\$4.92	\$3.09	\$18.57
BICSD at 5% Increase	\$49.86	\$134.39	\$0.005039		\$5.04	\$6.19	\$37.13
BLCSD at 7.5% Increase	\$51.05	\$137.59	\$0.005159		\$5.16	\$9.28	\$55.70
BLCSD at 10% Increase	\$52.24	\$140.79	\$0.005279		\$5.28	\$12.38	\$74.26
BLCSD at 12.5% Increase	\$53.43	\$143.99	\$0.005399		\$5.40	\$15.47	\$92.83
BLCSD at 15% Increase	\$54.61	\$147.19	\$0.005519		\$5.52	\$18.57	\$111.40

				Rate	e Increase District	· In	nnact				
				Nac	e merease Bistrice	<u> </u>	iipact				
2022 Operating Deficit	\$15,148	(los	ss)								
42 Service Hookups/loss per hookup	\$361		•								
Per Month loss per hookup	\$30.08										
2023 Initial Budget Income	\$6,945.00										
2023 Current Projection	\$2,453.00										
Loss to Projection	\$4,492.00										
Current Rates		2.5	% Increase		5%		7.50%	10%		12.50%	15%
			<u> </u>								
Base Rate 1	\$47.49	\$	48.68	\$	49.86	\$	51.05	\$ 52.24	\$	53.43	\$ 54.61
Base Rate 2	\$127.99	\$	131.19	\$	134.39	\$	137.59	\$ 140.79	\$	143.99	\$ 147.19
Water usage charge	\$0.004799		\$0.004919		\$0.005039		\$0.005159	\$ 0.005279	:	\$0.005399	\$0.005519
2023 Budget \$ base rate	\$24,785.42	\$	25,405.06	\$	26,024.69	\$	26,644.33	\$ 27,263.96	\$	27,883.60	\$ 28,503.23
2023 Budget \$ water charges	\$9,950.69	\$	10,199.46	\$	10,448.22	\$	10,696.99	\$ 10,945.76	\$	11,194.53	\$ 11,443.29
Total	\$34,736.11	\$	35,604.51		\$36,472.92		\$37,341.32	\$38,209.72		\$39,078.12	\$39,946.53
Increased Revenue for 12 Months		\$	868.40		\$1,736.81		\$2,605.21	\$3,473.61		\$4,342.01	\$5,210.42
A 15 % Rate increase over 3 years	\$15,631.25										
Loss in 2022	\$15,148.00										
Variance	\$483.25										
Cost of Living increase since 2015	27.35%										



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BIG LAGOON COMMUNITY SERVICES DISTRICT

PO Box 847 Trinidad, CA 95570 <u>boardsecretary@biglagooncsd.org</u> **REGULAR Bi-MONTHLY BOARD MEETING AGENDA**

The regular meeting of the Board of Directors of Big Lagoon CSD will be held Saturday, July 15,2023 at 10:00 a.m. in the Big Lagoon Elementary School Gymnasium.

The public may submit written comments or questions on any agenda item to the Board at: boardsecretary@biglagooncsd.org up until noon on Friday July 14, 2023 or comment on an agenda item when the Chair invites public comment. The Information Packet for this meeting is attached to this emailed Agenda. You can request the Packet by emailing: boardsecretary@biglagooncsd.org.

1. Chair's Call to Order (Greg)

Please address all public comments to the full Board. Per the Rules of Parliamentary Procedure members of the public do not engage in discussions or dialogues with the governing Board. The purpose of public comments is to inform the Board about your views. Public Participants are invited to address the Board at the start of the meeting, and at the start of every Agenda Item. There will be a time limit of three (3) minutes per person per Item. Any discussion of an Agenda Item will involve Board members only. Having the public comment before an Agenda Item gives a Board or Staff member the opportunity to incorporate the public's concerns in their report if they choose to do so.

If there are issues that demand more public input, or dialogue with the Board, then the Board may schedule a Stakeholder's Q&A at a future date. Thank you for attending and sharing your thoughts with us.

- 2. Agenda for July 15, 2023 Comments / Amend / Approval (Greg)
- 3. Public Comment: Any member of the public may address the Board on any item that is <u>not</u> on the agenda at this time. Per the Brown Act, the Board does not act upon, respond to, or comment on the merits of any item presented. **There is a time limit of three (3) minutes per person.** (Greg)
- 4. Recognize Public Correspondence received by noon on July 14,2023. (Greg)
- 5. May 20 ,2023 Unapproved Minutes Comments / Amend / Approval (Greg)

REPORTS (The public may comment <u>before</u> each report is given)

- 6. Chair's report (Greg)
 - 6.1) Board Vacancy
 - 6.2 Ferguson Group Information
 - 6.3 Generator Grant Replacement update.
 - 6.4 Surplus asset disposal-update
 - 6.5 Grant opportunities- NCRP
 - 6.6 Update on addresses with potential leaks and/or large usage.
- 7. Ratification of updated billing and collections policy if there is not a 50% +1 majority protest of the increases. (Addendum 1) Vote.
 - 7.1 Distribution plan and timeline for updated policy and Terms of Service. (Addendum #2)
- 8. Treasurer's Report (Louise)- May/June Financials (Addendums 3 &4)
 - 8.1 Collecting on past-due accounts update
 - 8.2 Billing and finances software update
- 9. Drought Emergency Conservation Measures Update (Chuck/Catherine)
 - 9.1 Water Conservation Community Survey- Board discussion.
- 10. Water Operator's Report (Val) Val will not be present. Greg to report.
 - 10.1 Update on potential back-up/ part time replacement.

10.2 Recovery analysis- (Addendum #5)

- 11. Meter Readers Report (Dana)- Dana will not be present. Greg to report.
- 12. Technology update (Joey)
- 13. Presentation from Sheila Cruson in regards to out of pocket undergrounding of utility expenses in regards to building of 97 Roundhouse Creek Road and undergrounding that did not occur to Lot #41. Is BLCSD interested in taking a position on this issue and providing guidance? (Catherine) (Vote)
- 14. Discussion of priority items identified at the prior meeting: MOU well site, water storage, additional well, by-laws update.
- 15. Update from Mara on District Contact List
- 16. Future agenda items from board members
- 17. ADJOURN

Meeting Packet Documents

Unapproved Minutes from 05/20/23 Meeting

Addendum #1- Billing and Collections Policy

Addendum #2- Terms of Service

Addendum #3- Balance Sheet

Addendum #4- P/L to Budget

Addendum #5- Recovery Analysis

BIG LAGOON COMMMUNITY SERVICES DISTRICT UNAPPROVED MINUTES of the Regular Monthly Board Meeting Saturday May 20, 2023 at 10 AM - Big Lagoon Elementary School Community Room

1. Chair's Call to Order (Greg)

The regular meeting of the Big Lagoon Community Services District convened at 10 AM. Board in attendance: Greg Sidoroff, Chair; Louise Minor, Treasurer; Chuck King, Director Staff in attendance: Mara Friedman, Secretary

2. Agenda for May 20, 2023 – Comments / Amend / Approval (Greg)

There were no changes to the agenda. Agenda is approved as distributed by Greg.

3. Public Comments

Kineema Moore disagrees with the proposed rate increase. She noted that out of 7 local water districts, only 2 (Westhaven and Trinidad) have higher rates than ours. She added that except for 2022, our district has always shown a profit. Although there has been a cost of living increase, there has not been a reciprocal increase in income and she requests that our water rate not be increased, In closing, she thanked the board for informing our community about the water assistance program.

4. Recognize Public Correspondence received by noon on May 19, 2023 (Greg)

All correspondence received has been emailed to and shared with all members of our district.

5. March 18, 2023 Unapproved Minutes – Comments / Amend / Approval (Greg)

There were no changes to the minutes. Minutes are approved as distributed by Greg.

REPORTS

6. Chair's report (Greg)

6.1 Board Vacancy

Greg has not had success finding a new board member. BLCSD is operating within the guidelines with only 4 board members. Greg has made the County Board of Supervisors aware of the situation and they can appoint a board member if they so choose.

6.2 Physical & electronic record retention/storage -update

There has not been much progress as Joey has been busy. Greg was able to get our district formation documents distributed. Greg noted that it is our intention is to post our most important documents (that are not confidential) on our website. It is a very slow process to scan and upload our historical documents and it could take many years to accomplish.

6.3 Generator Grant Application- update. Approved! Committee formation.

We have been approved for a \$6800 grant from Coast Central. We need to use the funds within one year and have 11 months left. Greg would like to form a committee to find 3 commercial bids for a new generator, as well as any upgrades needed at time of installation.

He asked if anyone present was willing to chair the back-up generator project? The chair needs to be familiar with our water system. Chuck offered to be part of the committee, but not to chair. Our current generator is 18 years old and needs to be replaced. The motor is good, but the electronics are not replaceable.

6.4 Surplus asset disposal-update

The shed from our water meter project has been temporarily moved to Gus and Mara's and can remain there as long as needed. We need to decide if we want to hold on to the shed or sell it? Greg will discuss with Val the clean-up needed at the well site to determine if we can sell and/or recycle some materials? Chuck volunteered to help, as well as the use of his truck, if the cleanup is done on a weekend. Louise offered the use of her trailer.

6.5 CSDA Meeting with Chris Norden on 5/02/23

Greg hosted a meeting with Chris Norden (PR rep for CSDA) that was attended by Val, Louise and Dana. Chris is eager to help us and has interesting information. CSDA offers low cap financing (bridge loans) for required up-front grant expenditures. CSDA works with grant writers from the Ferguson Group and this may offer a solution to our grant writing needs. We would pay a small upfront fee and the balance of their fee comes from the grant only if it is approved. CSDA offers professional development classes and possible scholarships to cover class expenses. They also offer one free hour per year toward consultation with an attorney.

6.6 Grant workshops attended-information sharing

Greg attended 2 online grant workshops, one with USDA. There are grant opportunities available to us. We as a community first need to decide what our priorities are so we can then focus on possible grants. Greg spoke with Steve Madrone regarding our unsuccessful grant application for North Coast Resource Partnership (NCRP). He advised us to figure out where/why we didn't score well and then resubmit. Chuck stated that this is why we should work with a professional group such as Ferguson. Greg added that we need a qualified engineer to do a complete system evaluation.

7. Treasurer's Report- March/April Financials (Louise)

7.1 Collecting on past-due accounts update

With one exception, all of our past-due accounts are paid. Based on our flow chart, the Treasurer will decide on next steps. Louise noted that she will confer with Dick to determine how to proceed with the one outstanding account

7.2 Billing and finances software update

Because our new meters are not fully functioning, they are still being manually read by Dana. Upon Dick's return, the board will decide how to proceed. Louise sent the current statement.

8. Drought Emergency Conservation Measures Update (Chuck/Catherine)

Public Comment: J. Donahoe noted that appliances bought in the last 10-15 years probably have water saving devices. Gus commented that the conservation information is a good start and he thinks the next step is community education. Chuck noted that the committee has broken up and only he and Catherine are left.

8.1 State Wide Water Restrictions Policy

Chuck noted that the flyer comes from the State Water Board and represents water restrictions mandated by the state.

8.2 Water Shortage Contingency Plan (WSCP) (Vote)

Public Comment: J. Donahoe stressed the importance of educating our community members as to where their shut-off valves are, how to shut-off in case of emergency, as well as giving everyone the phone number to call in an emergency. He recommended this info be included in a utility bill. Board Discussion: Chuck noted that the WSCP was created with information gleaned from other water districts and that the information is based on the length of a potential outage. Greg is very pleased with this document. The only change he recommends is a minor change of wording: 'social media post' to 'email'.

MOTION made to adopt the Water Shortage Contingency Plan as written, with the addition of 'email' being added as another means of communication for Stages 1 & 2.

Motion: Greg, Second: Louise – Motion Approved: 3 ayes, 0 nays

8.3 Water Conservation Community Survey (Vote)

Public Comment: Gus asked when will the survey be distributed? Board Discussion: Greg noted that based on the previous water year (October 1 thru September 30), we are currently 111% above normal. He posed the question as to how best does the community learn, to which J. Donahoe noted that in the past there were community events that educated our customers. Greg would like to add info to the survey relating WHY we need to conserve water and suggested postponing the vote until the next meeting.

(There was a 5 minute recess and the meeting resumed.)

9. Water Operator's Report (Val)

Val was not present to give his report.

10. Meter Readers Report (Dana unable to attend - Greg will report)

Public Comment: Gus thanked Greg for all his investigative efforts. Report: Joey is in charge of this project and until he is able to address the software issues, the meters will continue to be read manually by Dana. Dana identified meters with potential leaks and foam. Two meters are not electronically reporting to the tablet at all, but are physically recording water usage. Gus contacted Badger, who offered suggestions on how to determine where the software problems stem from. Gus noted that Badger will honor their warranty and that Hooven will honor their work for a year. On 5/19, Greg physically inspected all the boxes and fixed the foam issues. Gus will build an enclosure for the meter at 444 RH. In January 2020, Dana identified high usage at 443 RH and the homeowner was notified. Since then, apprx. half million gallons of water was lost based on typical homeowner usage. Recently, 2 toilets were replaced at this residence and the water usage dropped dramatically. Greg analysed the school meter data and determined that for several years, the school has been hugely under-billed. He also noted that the district's average customer usage is apprx 5000 gallons every 2 months.

He identified 2 residences where there has been excessive water usage and is talking to the homeowners individually. Greg concluded that tiered billing could help stop water waste.

11. Technology update (Joey unable to attend - Greg will report).

Greg noted that there is a challenge with the billing software that relates to the Yuma tablet. Joey's attempts to program the tablet didn't work. He is very busy and has not been able to get back to this task.

12. Presentation from Sheila Cruson in regards to out of pocket undergrounding of utility expenses in regards to building of 97 Roundhouse Creek Road and undergrounding that did not occur to Lot #41. Is BLCSD interested in taking a position on this issue and providing guidance? (Catherine) (Vote)

Sheila was not present. Greg noted that Catherine requested this agenda item be tabled to the next meeting via an email to prior to the meeting. Chuck noted we will never have a quorum to vote on this issue due to board recusal.

13. Terms of Service Agreement (TSA)- Discuss, Implement (Greg) (Vote)

Public Comment: Gus is delighted to see the TSA being adopted because it is very needed. Board Discussion: Greg noted that this document was created from other existing TSA documents. Because of situation with a tenant/landlord bill, we became aware of issues that should not be present if we had a TSA document that clarifies that homeowners are ultimately responsible for the water bill.

MOTION made to adopt the Terms of Service Agreement as written, with one minor change that the billing and collection and other water policies are subject to update over time. The TSA will go into effect on September 1, 2023.

Motion: Greg, Second: Chuck – Motion Approved: 3 ayes, 0 nays

14. Proposed Rate Increase: analysis/discussion/implementation if approved (Greg) (Vote) Greg did extensive research to create this analysis. All of the water districts he spoke with reported that their rates are going up. WHY are we looking at a water rate increase? In 2021, we had a 15K deficit. Contributing to our deficit: several major new bills came due and additionally some of our regular bills have increased. Our district can't continue to operate in a 'negative'. At best, if there are no emergencies, we will only break even as a district. There are not enough funds in the bank to cover big emergencies. Greg believes in tiered billing, which is another discussion for a later time. Our cost of living has gone up 27% since our last rate increase in 2015. As a stop gap, Greg suggests that our rates be increased 15%. This would put an extra \$5000 into our savings annually. As an average estimate, a 15% rate increase for a total of 3000 gallons/month equals an increase of \$18.57 over a 2 month billing cycle and would total \$111 annually per customer. Greg had a great conversation with Westhaven, where the water rates are high. Chuck applauds Greg's good work and supports the proposed rate increase. He noted that it is a state requirement to hold a public hearing about a potential

rate increase. He added that we must follow state procedures if we are going to move forward with the rate increase and he will forward Greg the link to the official document.

Essentially, there needs to be a special mailing 45 days before the public hearing which will inform our customers what and why we are proposing a rate increase. We will hold a public hearing in July. The following steps need to be taken to approve the rate increase: 1. The board needs to agree on the 15% increase. 2. A mailer needs to go out 45 days in advance of the public hearing. 3. The rate increase will go into effect if we do not get a majority plus 1 written objections. Final thoughts: Gus thinks we should adopt an automatic rate increase yearly to reflect inflation, to which Greg agrees.

MOTION made to adopt the proposed 15% rate increase of our base water rate and water usage fees, effective September 1, 2023, once all legal notification requirements have been abided by.

Motion: Greg, Second: Louise – Motion Approved: 3 ayes, 0 nays

15. Community Input Survey- Results review Discussion/ Action for future. (Greg)

A clear priority from our survey is to determine our long-term plan in regards to the water operator. Currently only a few people in our community know how to turn off the entire system in case of an emergency. Trevor Avram is the certified D1 water operator in Orick and he may be willing to help us out. Greg suggested that Trevor meet with Val, who can find out his hourly rate and perhaps get an estimated bid. There has also been some contact with the water operator from the BL Park Company. The reality is that we must develop a back-up plan to outsource the water operator function over time. Chuck and Rob feel that increased water storage and a second well are both high priority issues facing our community. Another high priority issue pertains to creating an MOU with the owners of the well site property. First we need to clean up the well site and then we will reach out to the owners. Going forward, we will need permission from the owners to make any changes to their property, such as a new well and more water storage. Rob noted that there is an existing well at the top of RH and we should investigate the possibility of this being an alternate water supply. In closing, Greg noted that he would like the board to focus on 2 or 3 items from each side of the survey and suggested the following priorities: ADMINISTRATIVE - 1. Water Operator; 2. Updates to our bylaws and OPERATIONS - 1. Alternative water storage; 2. New well; 3. MOU.

16. Future agenda items from board members

Catherine – Sheila Cruson presentation Chuck – water conservation survey

17. ADJOURN

With no other business, the Chair adjourned the meeting at 12:57 PM.

The next regular meeting will be Saturday July 15, 2023 at 10 AM in the Big Lagoon School gymnasium.

Submitted by Mara Friedman, Board Secretary

BIG LAGOON COMMUNITY SERVICES DISTRICT (BLCSD) WATER SERVICE BILLING, COLLECTIONS, AND OTHER WATER POLICIES

*** Notes Proposed Changes

WATER SERVICE BILLING

Meters are read 6 times a year.

Billing bi-monthly per the schedule below

January – for period of November and December March- for period of January and February May- for period of March and April July- for period of May and June September- for period of July and August November- for period of September and October

Effective *** September 1, 2023, water rates for both the base rate and water usage. The new rate schedule is listed below.

Item	Description	Old Rate	09/01/23
Base	Base Rate per month	\$47.49	\$54.61
Base Rate 2 Connection	Base Rate per month Water meter connection	\$127.99 \$5,000.00	\$147.19 \$5,000.00
Gallon	Water Usage gallon meter	\$0.004799	\$0.005519

Due date is 30 days from bill mailing date, and is extended out to the next business day if the due date falls on a Sunday or legal holiday. The bill becomes delinquent on the day after the due date. As long as payment is received no later than 30 days after the due date (a 30-day grace period), no late penalties will be assessed.

Water rates and charges which are not paid on or before the end of the grace period shall be subject to a penalty of \$15.00, and thereafter shall be subject to a further penalty of 1% per month on the first day of each month following.

The BLCSD shall charge the full returned payment fee, or \$25 (twenty-five dollars), whichever is greater, each time a customer's payment is rejected by that customer's financial institution.

If the bill is not paid within 60 days of the due date, the water will be disconnected as provided below in the DISCONNECTION OF WATER SERVICE FOR NONPAYMENT POLICY unless amortization arrangements are made.

BLCSD customers who find themselves at risk of imminent service interruption are encouraged to contact Louise Minor, Treasurer at 707-677-0720 or 155 Roundhouse Creek Road, or finance@biglagooncsd.org to discuss their options such as deferred payment, amortization, or appeal.

SUIT - all unpaid water rates and charges and penalties herein provided may be collected by suit.

COSTS - defendant shall pay all costs of suit in any judgment rendered in favor of BLCSD.

DISCONNECTION OF WATER SERVICE FOR NONPAYMENT POLICY

BLCSD recognizes all Californians have the right to safe, accessible, and affordable water as declared by Section 106.3 of the State Water Code. In the event that a water bill becomes delinquent, BLCSD will apply the following Disconnection of Water Service for Nonpayment Policy (Policy). Disconnection of water service for nonpayment is considered the final phase of the collection procedure and will be instituted only after sufficient notification, and when all other reasonable alternatives have been exhausted. This Policy applies to all BLCSD water service users. To the extent this Policy conflicts with any other rules, regulations, or policies of the BLCSD, this Policy will control.

General Provisions

All BLCSD users will pay a bimonthly water service and usage charge. All bills for water service are due and payable 30 days after the mailing date by BLCSD, and the due date will be extended to the next business day if the due date falls on a Sunday or legal holiday. A bill becomes delinquent on the day after the due date. A 30-day grace period will follow before a late penalty goes into effect. *** Partial Payments: The District will apply partial payments first to the accumulated late fees if any, then to the accumulated interest penalties if any, and last to outstanding water usage and base rate fees, oldest first. ***

- 1. A late penalty of \$15.00, and thereafter a further penalty of 1% per month on the first day of each month following, will be applied to delinquent charges after the 30-day grace period has expired.
- 2. BLCSD shall charge the full returned payment fee, or \$25 (twenty-five dollars), whichever is greater, each time a customer's payment is rejected by that customer's financial institution.
- 3. BLCSD will disconnect water service for charges that have become delinquent for a period of no less than sixty days from the due date.
- 4. A lock service charge will be applied to the account of any water service disconnected for nonpayment of delinquent charges. BLCSD will leave notice of disconnection with information on how to restore water service.
- 5. An unlock service charge will be applied to the account of any water service prior to restoration of water service.
- 6. Customers whose water service has been disconnected may contact BLCSD by email, or by telephone, regarding restoration of service. Restoration will be subject to payment of the delinquent charges, lock service charge, and an unlock service charge. BLCSD may also require written request to restore service from the owner of the property. All payments must be made by cash or certified funds. Water service reconnections will be processed Monday Friday.

Notice to Customer/Property Owner

BLCSD will provide a mailed written notice, postage prepaid, to the customer of record, and property owner, at least thirty (30) days before disconnection of water service. If this notice is returned through the mail as undeliverable, BLCSD will attempt to contact the customer by email or telephone. The written notice will be in a clear and legible format and contain:

- i. the name and address of the customer whose account is delinquent;
- ii. the amount of the delinquency;
- iii. the date by which payment or payment arrangements must be made to avoid disconnection of service;
- iv. the procedure by which the customer may initiate a complaint or request an investigation or appeal concerning service or charges;
- v. a description of the procedure by which the customer may request an amortization, reduction, or other alternative payment arrangement;
- vi. the procedure for the customer to obtain information on financial assistance, including private, local, state, or federal sources, if applicable; and
- vii. the telephone number and email address where the customer may request a payment arrangement or receive additional information from BLCSD.

Posting of Notice at Service Address

BLCSD will make every good faith effort to inform the actual users of the services by leaving a written notice of imminent disconnection of residential service in a conspicuous place at the service address at least ten (10) days before disconnection of water service.

The notice will be addressed to "Occupant," will contain the same notice information required above for Written Notice to Customer and will also inform the actual users that they have the right to become customers of BLCSD without being required to pay the amount due on the delinquent account. The notice will be in English and the languages listed in Civil Code section 1632. Terms and conditions for actual users to become customers of BLCSD are provided in this Policy.

This final notice of intent to disconnect service will be posted in a prominent and conspicuous location at the service address. The final notice will not entitle the customer to any investigation or review by BLCSD.

BLCSD shall also make a reasonable, good faith effort to contact an adult person residing at the service address by telephone or in person at least ten (10) days prior to any disconnection of service.

If the Written Notice to Customer provided above is returned through the mail as undeliverable, and BLCSD is unable to contact the customer by email or telephone, BLCSD will include a copy of this Policy with the posted notice to occupants at the service address.

Customer Assistance

1. Bill Complaint or Review

Any customer may initiate a complaint, or request an investigation, to the Board Treasurer into the charges on their bill, any component of the bill, or any service provided by BLCSD no later than ten (10) days from the due date of the disputed bill. BLCSD will not disconnect water service during an investigation of a timely complaint or dispute. The Treasurer's review will include consideration of whether the customer may receive an amortization, alternative payment schedule, or payment reduction under this Policy. If the customer considers the results of the investigation by the Treasurer to be unfavorable, they have the right to appeal the Treasurer's decision to BLCSD's Board of Directors. The customer must file a written notice of appeal with the BLCSD Secretary within ten (10) business days of BLCSD's mailing of its determination. BLCSD's Board Chair will set the matter to be heard at an upcoming Board meeting and mail the customer written notice of the time and place of the hearing at least ten (10) days before the meeting. If the appellant does not intend to attend the appeal all written materials pertaining to the appeal must be presented by the appellant no later than 72 hours prior to the appeal date for proper board consideration. The materials may be submitted via USPS, courier service, or to boardsecretary@biglagooncsd.org. If attending in person the appellant can present materials to the board for consideration when the agenda item is up for discussion. (6 copies preferred). The decision of the Board is final.

2. Bill Amortization

If a customer has an excessive bill due to an extended period of nonpayment, BLCSD will consider a request to amortize the bill over a reasonable period of time, not to exceed twelve (12) months. The amortization schedule and amounts due will be set forth in writing and provided to the customer. During the amortization period, the customer must remain current on all water service charges in subsequent billing periods. BLCSD may pursue disconnection of water service as described above if the customer fails to pay an amortized amount due by the schedule date and the original amount due is delinquent by at least sixty days. If the customer fails to comply with the amortization agreement, BLCSD shall give the customer at least ten (10) days notice of the conditions the customer is required to meet to avoid termination. The final notice will not entitle the customer to any investigation or review by BLCSD.

3. Contact

Customers are encouraged to contact any Board Member for further details regarding this policy by email or by telephone.

When Service Will Not Be Disconnected

BLCSD will not disconnect water service due to nonpayment on a Saturday, Sunday, legal holiday. In addition, BLCSD will not disconnect residential water service for nonpayment during an investigation of a customer dispute or complaint, during an appeal to BLCSD's Board of Directors, or during a BLCSD-approved extension, amortization, alternative payment schedule, or reduction, if the customer remains in compliance with the payment arrangement. Special Medical and Financial Circumstances with Amortization Agreement BLCSD will not disconnect water service if all of the following are met: The customer, or a tenant of the customer, submits to BLCSD the certification of a licensed primary care provider that disconnection of water service will be life threatening to, or pose a serious threat to the health and safety of a resident of the premises where residential service is provided; and

The customer demonstrates that they are financially unable to pay for residential service within BLCSD's normal billing cycle. The customer is deemed financially unable to pay during the normal billing cycle if: (a) any member of the customer's household is a current recipient of CalWORKs, CalFresh, general assistance, Medi-Cal, California SSI/SSP, or California Special Supplemental Nutrition Program for Women, Infants, and Children, or (b) the customer declares under penalty of perjury that the household's annual income is less than 200 percent of the federal poverty level; and the customer is willing to enter into an amortization with respect to the delinquent charges.

For any customers who meet all of the above qualifications, BLCSD will offer the customer amortization of the unpaid balance. The BLCSD Board will select terms and conditions for the amortization.

The customer is responsible for demonstrating that the qualifications above have been met. Upon receipt of documentation from the customer, BLCSD will review the documentation within seven (7) days and: (1) notify the customer of the amortization terms selected by BLCSD and request the customer's signed assent to participate in the amortization; (2) request additional information from the customer; or (3) notify the customer that they do not meet the qualifications and will be sent a Final Notice of Disconnection Of Water Service For Nonpayment.

4. Procedures for Occupants or Tenants to Become Customers of BLCSD

This section only applies when a property owner, landlord, manager, or operator of a residential service address is listed as the customer of record and has been issued a notice of intent to disconnect water service due to nonpayment.

BLCSD will make service available to the actual residential occupants if each occupant agrees to the terms and conditions of service and meets the requirements of the BLCSD's rules and regulations. Notwithstanding, if one or more of the occupants are willing and able to assume responsibility for the subsequent charges to the account to the satisfaction of BLCSD, or if there is a physical means, legally available to the district, of selectively terminating service to those actual users who have not met the requirements of the BLCSD's rules and regulations, BLCSD will make service available to the occupants who have met those requirements.

5. Other Remedies

In addition to disconnection of water service, BLCSD may pursue any other remedies available in law or equity for nonpayment of water service charges, including, but not limited to: securing delinquent amounts by filing liens on real property, filing a claim or legal action, or referring the unpaid amount to collections. In the event a legal action is decided in favor of BLCSD, BLCSD will be entitled to the payment of all costs and expenses, including attorneys' fees and accumulated interest.

COLLECTION BY INTERAGENCY INTERCEPT PROGRAM - as an alternative to any of the other procedures herein provided, the BLCSD may collect unpaid user fees and charges through the State of California Interagency Intercept Program. Upon submitting an unpaid charge to the State, BLCSD will also notify the customer at the last known customer address. Customers may appeal said submittal by filing an appeal. Information about the State of California Interagency Intercept Program is attached as Addendum "A." Customers wishing to

know more about this program may look at the State of California Franchise Tax Board's website.

BLCSD reserves the right to disconnect water service for any violations of District ordinances, rules, or regulations other than nonpayment.

Except as otherwise expressly stated in this Policy, any fees and charges incurred by a customer under any other rules, regulations, or policies of BLCSD, including, but not limited to, delinquent charges, will be due and payable as set forth therein.

6. Reconnection Fees and Deposit

Failure to receive a bill does not relieve consumer of liability. Any amount due shall be deemed a debt to the BLCSD, neglecting or refusing to pay said indebtedness shall be liable to an action in the name of the BLCSD in any court of competent jurisdiction for the amount thereof. A reconnection charge shall be made and collected prior to renewing service following an initial disconnection or suspension. The reconnection charge of \$50.00 will be added to the total balance due. Service reconnection shall also require the payment of all charges currently due in addition to the reconnection charges. An additional refundable deposit of \$500.00 will be required. The deposit will be refunded after 6 consecutive on time payments. No interest is due upon refund.

7. Disconnection for Reasons other than Nonpayment

a. Unsafe Apparatus - water service may be refused or disconnection to any premises where apparatus or appliances are in use which might endanger or disturb the service to other customers.

Cross-Connections - water service may be refused or disconnection to any premises where there exists a cross-connection in violation of State or Federal laws.

- **b. Fraud or Abuse** service may be disconnected, if necessary, to protect the BLCSD against fraud or abuse.
- **c. Non-compliance with Regulations** service may be disconnected for non-compliance with this or any other ordinance or regulation relating to the water service.
- **d. Vacating Premises** customers desiring to disconnect service should so notify the BLCSD two (2) days prior to vacating the premises. Unless disconnection of service is ordered, the customers shall be liable for charges whether any water is used.

8. Programs Available to Low Income Households

At times there may be Federal or State programs that provide financial assistance to low income households. For example, in 2021/2022 California was allocated \$116 million in one-time funding for the Low-Income Household Water Assistance Program (LIHWAP) to be administered by the California Department of Community Services and Development. BLCSD has applied to this program on behalf of customers who may qualify for financial assistance. As such programs become available BLCSD will inform customers of these programs.

REFERENCES

California Water Code div. 1, Ch. 1, § 106.3

California Government Code, tit. 6, div. 1, § 60370 et seq

ADDENDUM "A"

Interagency Intercept Collection (IIC) Program

Overview

Many California taxpayers do not pay delinquent debts to government agencies and California colleges. Yet, these individuals are scheduled to receive state payments that include Franchise Tax Board (FTB) personal income tax refunds, Unclaimed Property Division (UPD) claim payments, or California State Lottery winnings.

FTB administers the Interagency Intercept Collection Program on behalf of the State Controller's Office (SCO). The program intercepts these funds and transfers them to pay the individual's debts to agencies and colleges (hereinafter referred to as "agency"). We do not intercept corporation, limited liability company, or partnership funds.

Benefits

The IIC Program has been in existence since 1975, initially intercepting only Personal Income Tax refunds. We included lottery winnings in 1984 and added unclaimed property payments in 2009. In 2018, we collected \$384 million for over 600 agencies.

Cost

The IIC Program determines the service fee for each successful offset. SCO charges this fee to reimburse the administrative costs of the program. We base this fee on actual costs incurred, which vary each year. The approximate cost is \$2.50 to \$3.00 per successful offset. The IIC Program will post a bulletin to advise you of the cost for the year. Agencies can add this fee to the debtor's account balance. SCO bills each agency in April for each successful intercept during the previous calendar year.

Authority

The government code sections in the following table relate to the IIC Program. These codes determine the exact debts you can submit to the IIC Program.

Interagency Intercept Collection (IIC) program on behalf of the State Controller's Office

The IIC program intercepts (offsets) refunds when individuals and business entities owe delinquent debts to government agencies including the IRS and California colleges.

An **interagency intercept** occurs when our IIC program receives a request from one of the participating agencies to intercept tax refunds, lottery winnings, or unclaimed property payments from individuals or business entities who owe delinquent amounts. All refunds are subject to interception. We only intercept the amount owed. We intercept lottery winnings for all agencies except for the IRS.

If a participating agency requests we intercept someone's funds, we seize and send only the amount of the debt to the requesting agency.

Refunds from joint tax returns may be applied to the debts of the taxpayer, spouse or registered domestic partner. After all tax liabilities are paid we apply any remaining credit to voluntary contributions if requested; and then, the remainder will be refunded. The State Controller's Office will mail a check for the remaining amount.

If the taxpayer's debt was previously paid to the requestor and we also intercepted the taxpayer's refund, any overpayment will be refunded by the agency that received the funds. Please allow 3 to 4 months of processing time.

For details about the debt, taxpayers must call the agency listed on the intercept notice we sent. BLCSD does not have any information about the taxpayer's debt with the agency.



Neighbors working together to ensure Big Lagoon Community Service District's water needs are met today, tomorrow, and into the future

TERMS OF SERVICE AGREEMENT

Property Owner (Customer):							
Mailing Address:							
Home Phone:	Cell Phone:	_					
Emergency Contact Number:							
Service Address:							
APN#							

The undersigned property owner (customer) requests that Big Lagoon Community Service District PO Box 847, Trinidad, CA 95570 make a water connection and/or supply water service at the above-described premises, and agrees to be ultimately responsible for payment of applicable charges for service, and agrees to observe any and all District rules and regulations now or hereafter adopted for water service as they may be amended from time to time. I/we have been provided a copy of the Big Lagoon Community Services District (BLCSD) Water Service and Billing Collections, and Other Water Policies (subject to updates over time).

Responsibility for Notification:

- 1. Sale of Property: Upon the sale of a property, the current owner is to notify the District as to the date of close of escrow. Failure to notify the District of that date will continue the accrual of fees and charges until such notification is provided.
- 2. Purchase of Property: It is the responsibility of a new owner to notify the District immediately upon close of escrow. In the event a property-owner fails to notify the District and the District determines new ownership via other means, an account will be opened in the new owner's name and said property will be subject to all the requirements outlined within this policy. Charges will be attributed to account as accrued including all fees and charges outlined in the District Billing and Collection Policy.
- 3. Lease of Property: Owner/Tenants. California law allows tenants to apply for a utility account in their own name. The BLCSD requires a copy of the signed lease to apply for such account. The property owner remains ultimately responsible for utility payments, late fees, interest, and service

charges. In the event of any delinquency, all notices of delinquency will be sent to both the tenant and the owner of record. Delinquency proceedings will be conducted with the owner of record.

4. Agent Application (For Owner's with property under a Management Agreement) a. An application by any Owner must comply with this agreement. b. Owner Applicant must also provide a copy of a new updated Management Agreement authorizing action on their behalf. In the event a Management Agreement has ended or been revoked, it is the responsibility of the property owner to notify the District.

Date:	_
Signature(s):	

The personal information provided herein shall remain confidential and will only be disclosed as required by applicable law (Government Code § 6254.16). The District will use the information for the purposes of providing services and collections.

www.biglagooncsd.org

For questions on this form please contact: finance@biglagooncsd.org

Big Lagoon Community Services District Balance Sheet

As of July 3, 2023

Jul 3, 23	
ASSETS	
Current Assets	
Checking/Savings Umpqua Checking	114,347.30
Total Checking/Savings	114,347.30
Accounts Receivable	
Accounts Receivable	5,494.00
Total Accounts Receivable	5,494.00
Total Current Assets	119,841.30
Fixed Assets	
Water System	
Computer 785.50	
Meter Project 30,761.70	
Well Improvements 3,072.10	
LP Tank 2,889.62	
Fence 4,998.21	
Pressure System 2011 10,038.00 2-5,000 Gal Tanks 19,700.82	
2-5,000 Gal Tanks 19,700.82 Well 2010 18,647.44	
Professional Control of the Control	
7	
Electrical System 9,931.00 Fire hydrants 8,520.86	
Generator 13,998.00	
Initial Purchase 75,000.00	
Accumulated Depreciation -160,072.35	
Total Water System	44,408.57
Total Fixed Assets	44,408.57
Other Assets	
Start Up	
Start-up Expenses 6,666.84	
Amortized Amount -6,666.84	
Total Start Up	0.00
Total Other Assets	0.00

Big Lagoon Community Services District Balance Sheet

As of July 3, 2023

	Jul 3, 23			
LIABILITIES & EQUITY Equity				
Opening Bal Equity	-544.57			
Retained Earnings	177,965.98			
Net Income	-13,171.54			
Total Equity	164,249.87			
TOTAL LIABILITIES & EQUITY	164,249.87			

Big Lagoon Community Services District Profit & Loss Budget Performance May 1 through July 1, 2023

	May 1 - Jul 1, 23	Budget	Jan 1 - Jul 1, 23	YTD Budget	Annual Budget
Ordinary Income/Expense					
Income					
backflow	90.00	0.00	90.00	0.00	
Non Compliance Fee	0.00	0.00	0.00	0.00	0.00
Base Rate - Monthly	3,978.89	4,272.33	12,446.53	12,502.47	24,785.42
Service Revenue	0.00	0.00	0.00	0.00	
Water Usage Income	1,366.83	1,827.88	3,815.14	4,640.89	9,950.69
Late Fee	35.39	0.00	130.82	0.00	
Installation Revenue	0.00	0.00	0.00	0.00	
Adjustment / Returned Check	0.00	0.00	0.00	0.00	0.00
Donation	0.00	0.00	1,000.00	0.00	0.00
Interest	0.00	0.00	0.00	0.00	
Total Income	5,471.11	6,100.21	17,482.49	17,143.36	34,736.11
Cost of Goods Sold					
Cost of Goods Sold	0.00	0.00	0.00	0.00	
Total COGS	0.00	0.00	0.00	0.00	
Gross Profit	5,471.11	6,100.21	17,482.49	17,143.36	34,736.11
Expense					
Reconciliation Discrepancies	0.00	0.00	0.00	0.00	
Bank Charges	0.00	0.00	0.00	0.00	
Interest Expense	0.00	0.00	0.00	0.00	
Non-Cash Expenses					
Amortization	0.00	0.00	0.00	0.00	
Depreciation Expense	0.00	1.892.00	1,892.00	3,784.00	7,568.00
Non-Cash Expenses - Other	0.00	0.00	0.00	0.00	
Total Non-Cash Expenses	0.00	1,892.00	1,892.00	3,784.00	7,568.00
Operational Expenses					
Election	0.00	0.00	0.00	0.00	
Water Meters	0.00	0.00	20,432.47	0.00	
Supplies	0.00	304.84	0.00	904.84	1,800.00
Training	0.00	0.00	0.00	0.00	
Water	0.00	0.00	174.00	0.00	
Accounting	66.00	0.00	66.00	0.00	
Dues	66.00	0.00	696.25	275.00	475.00
Electric	280.81	508.25	1,333.54	1,420.79	3,002.59
Gas	0.00	0.00	1,202.48	2,722.69	2,722.69
Insurance	4,379.75	4,000.00	4,379.75	4,000.00	4,350.00
Maintenance	530.77	812.90	1,430.30	2,412.90	4,800.00
Office Supplies	104.74	101.61	650.83	301.61	600.00
Parts	0.00	0.00	81.87	0.00	
Postage	63.00	2.45	142.46	222.45	528.00
Regulatory Expenses	0.00	0.00	0.00	0.00	

Big Lagoon Community Services District Profit & Loss Budget Performance May 1 through July 1, 2023

	May 1 - Jul 1, 23	Budget	Jan 1 - Jul 1, 23	YTD Budget	Annual Budget
Water Testing	165.00	333.23	1,000.00	1,298.23	1.795.00
Water Distribution Operator	0.00	0.00	0.00	0.00	,
Operational Expenses - Other	0.00	0.00	0.00	0.00	
Total Operational Expenses	5,656.07	6,063.28	31,589.95	13,558.51	20,073.28
Organizational Costs					
Escrow Costs	0.00	0.00	0.00	0.00	
Legal Fees	0.00	406.45	2,453.50	1,206.45	2,400.00
Loan Fees	0.00	0.00	0.00	0.00	
Misc Exp	0.00	0.00	0.00	0.00	
Organizational Costs - Other	0.00	0.00	0.00	0.00	
Total Organizational Costs	0.00	406.45	2,453.50	1,206.45	2,400.00
Uncategorized Expenses	0.00	0.00	0.00	0.00	
Total Expense	5,656.07	8,361.73	35,935.45	18,548.96	30,041.28
Net Ordinary Income	-184.96	-2,261.52	-18,452.96	-1,405.60	4,694.83
Other Income/Expense Other Income					
Other Income - Donation	0.00	0.00	0.00	0.00	
Total Other Income	0.00	0.00	0.00	0.00	
Net Other Income	0.00	0.00	0.00	0.00	0.00
Net Income	-184.96	-2,261.52	-18,452.96	-1,405.60	4,694.83

Recovery Analysis July 01,2023

This is a preliminary effort to ascertain how much water BLCSD is pumping vs how much is being billed to customer accounts.

Master Well Meter May 8 - 7,319,000 Master Well Meter May 10- 7,327,400 So for estimate purposes we will split that and say the master was 7,323,200 on May 9.

July 1 Master- 7,559,000 Usage- 235,800 gallons Billed usage (May 09-July 01) - 226,767 gallons Variance- 9,033 gallons Variance %- 3.83 % 51 day billing cycle - 177 gallons/ day loss.

Value of water loss (current rates)- 177 * .(.004799)= .85 cents per day.

Some factors that influence "lost water/not billed"- usage at the well site, if a fire hydrant is used/tested, leaks in service pipes past the well meter but before customer meters.

At some point BLCSD may want to consider putting a Badger radio meter on the well site. Per Val the current meter is 8 years old, and while the chances are low it is not performing properly the tracking data from the radio meter may prove to be beneficial for easier analysis and accuracy over time.

This is the first attempt at measuring this and on September 1, 2023 I will definitely do the same analysis.

I find this extremely interesting and truthfully thought the loss would be higher.

Greg