

# Staff Report

**TO:** Board of Directors  
**FROM:** Chip Close, Water Operations Manager  
**DATE:** April 19, 2022  
**SUBJECT:** NID Off Season Water Services

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## ***WATER OPERATIONS***

### **RECOMMENDATION:**

Review and discuss the water services offered by NID during the offseason (winter months).

### **BACKGROUND:**

#### **Annual Raw Water Service**

Annual water service was initially established at a time when modern water treatment plants did not exist. Canal water was utilized for all purposes, including in-home use therefore year-round service was required. The addition of NID water treatment plants and potable water distribution systems in the late 1960's, along with changes to public health and safety codes, has changed the need for annual water use. Annual raw water service is defined in NID's Rules and Regulations as "Deliveries are made year-round at a rate of flow that may differ between the irrigation and the winter seasons. No new accounts are accepted for this category of service." Per this definition, this account classification is slowly being reduced through attrition. As accounts drop service, or become delinquent, they are switched to seasonal & winter accounts. Customers who utilize this service are billed monthly, similar to NID's treated water customers. According to our records, 273 of these types of accounts remain (includes Constructed Conveyance detailed below).

#### **Constructed Conveyance**

In 1996 the Environmental Protection Agency introduced multiple amendments to the Safe Drinking Water Act (SDWA). One of the amendments included a change in definition of a public water system. The amended definition expanded the public water system to include Constructed Conveyances. A constructed conveyance is

defined as “the means of delivering water to include not only systems which provide water for human consumption through pipes, but also systems which provide water for human consumption through other constructed conveyances.” This expanded definition meant that NID canal water customers could be considered customers of a public water system, and NID would be required to provide treatment for each connection.

Providing treatment for these connections was found infeasible due to the remote nature of many of these connections and due to a lack of point of use systems. So, to abide by the SDWA yet continue to provide year-round canal water service, NID came up with a solution that required any year-round canal water customer to provide proof of an alternate drinking water supply to continue winter water service. This self-certification provides the documentation necessary to show the Federal and State regulatory agencies that customers were not utilizing NID canal water for drinking or cooking purposes, and therefore should not be considered a supply for human consumption.

The program requires that each customer self-certify that they have an alternate potable water supply from a bottled water delivery company to their home. District staff periodically checks bottled water delivery receipts to ensure compliance. To date, there are 119 customer accounts classified as “Constructed Conveyance” accounts. New Constructed Conveyance accounts are no longer allowed. Additionally, when a constructed conveyance parcel changes ownership, NID sends a new questionnaire to ensure continued certification.

### **Fall / Stock Water Service**

Fall water service is defined in NID’s Rules and Regulations as “A service available during the period from October 15 to December 1, both dates inclusive. This service will only be provided when and where the District has available water and is secondary to seasonal or demand water”. Historically, Fall /Stock water was seldomly used and was developed to provide a short period of water supply to hold ranchers over until the rains begin falling in December. The request for this service in recent years has greatly expanded due to drought and worries over late fall fire protection. In 2015, there were 14 customers utilizing this service as compared to 137 in 2020. Per its definition, this water service is only offered in years when water supply is robust. This water service was not offered in 2021 due to drought conditions.

### **Winter Water Service**

Winter water service is defined in NID Rules and Regulations as “Water delivered approximately October 15 and ending approximately April 14, unless otherwise determined by the Board”. The most common request for winter water today is for Stock Water (drinking water for animals), irrigation through the winter months, and incidental home use, including showers and toilets. The demand for winter water service has increased in recent years due to drought conditions. Many customers

are purchasing this service to extend irrigation for fire protection in the fall and winter months.

Winter water comes at a higher cost as compared to summer service. The additional fees can be attributed to the increased labor required to monitor and maintain canals during storm events.

The number of NID Canals that offer winter service is limited. Of the District's 161 canals, 92 offer winter service. NID is not expanding winter service to canals that have not historically received this service. This is to limit the amount of water pulled from storage at a time when our reservoirs should be refilling. There are several factors that help to determine winter availability for each canal. These include lack of supply due to no connectivity to upstream canals in the off-season, no place to spill excess flows, and long lengths of canal for a very limited number of requestors.

**BUDGETARY IMPACT:**

A breakdown of the total number of off season raw water account billings in 2021 is as follows:

Account Type	Number of Accounts	Total Billed 2021
Annual Water Service	273	\$459,000
Constructed Conveyance	119*	
Fall / Stock Water	0 (due to drought)	
Winter Water	588	\$700,000
Totals	861	\$1,159,000

\*is included in the Annual Water Service count

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