



THE CITY OF SAN DIEGO

DATE: December 28, 2017
Revised January 9, 2018

TO: Cybele Thompson, Real Estate Assets Department Director
Vic Bienes, Public Utilities Department Director

FROM: Eduardo Luna, CIA, CGFM, City Auditor
Office of the City Auditor

SUBJECT: Fraud Hotline Investigation of Water Theft

On May 4, 2017, the Office of the City Auditor received an anonymous Fraud Hotline report alleging that a City vendor for the City's two general aviation airports, has been using water from City hydrants without paying for several years. Our investigation determined that the allegation was substantiated. It also appears that the vendor may have violated the San Diego Municipal Code section regarding use of water from a City fire hydrant. We noted that the City's contract with the vendor did not require the vendor to pay for the water and City staff directed the vendor to use the water without a meter for approximately 10 years.

We also determined that a new contract, which was out for bid during our investigation, did not address water use, and did not include a reference to the City's Fire Hydrant Meter Program. Although a different vendor raised the question at a recent pre-bid conference, Airports Division staff did not provide that information to the Purchasing and Contracting Department to be included as an addendum to the contract.

We made four recommendations to hold the vendor accountable, update City's policy, recover costs, and include payment for water use in the new contract. City management agreed to implement all four recommendations.

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TO REPORT FRAUD, WASTE, OR ABUSE, CALL OUR FRAUD HOTLINE: (866) 809-3500



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The City Operates Two General Aviation Airports

The Airports Division of the City's Real Estate Assets Department manages two general aviation airports, currently known as Montgomery-Gibbs Executive Airport (Montgomery Field) and Brown Field Municipal Airport (Brown Field). General aviation airports, such as the City's, service most civilian aviation activities. Both airports are available to help relieve air traffic congestion from the San Diego International Airport.

San Diego Municipal Code Requires Authorization, Metering, and Payment for Fire Hydrant Water Use

San Diego Municipal Code (SDMC) §67.0212(b) states, "It is unlawful to use City water from a fire hydrant for purposes other than extinguishing a fire without prior authorization from the Department and installation of a fire hydrant meter, regardless of knowledge or intent."

Also, SDMC §67.0509 and §67.0510 require construction-metered water use and City department water to be billed at applicable rates.

The City's Fire Hydrant Meter Program is Standard in Construction Contracts

A standard section in the City's construction contracts refers to the City's Fire Hydrant Meter Program (**Attachment A**). The 13-page policy includes a description of the Public Utilities Department's (PUD) program, and outlines the acceptable use of water from City hydrants. The document is dated April 21, 2000, and contains obsolete references to the SDMC and other references that need to be updated. However, the substantive description of the policy is consistent with the way the program currently operates.

Section 8 of the document is titled, "Unauthorized use of water from a hydrant." The relevant parts of that section read as follows:

- 8.1 Use of water from any fire hydrant without a properly issued and installed fire hydrant meter is theft of City property. Customers who use water for unauthorized purposes or without a City of San Diego issued meter will be prosecuted.

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- 8.2 If any unauthorized connection, disconnection or relocation of a fire hydrant meter, or other connection device is made by anyone other than authorized Water Department personnel, the person making the connection will be prosecuted for a violation of San Diego Municipal Code, Section 67.15. In the case of a second offense, the customer's fire hydrant meter shall be confiscated and/or the deposit will be forfeited.
- 8.3 Unauthorized water use shall be billed to the responsible party. Water use charges shall be based on meter readings, or estimates when meter readings are not available.
- 8.4 In case of unauthorized water use, the customer shall be billed for all applicable charges as if proper authorization for the water use had been obtained, including but not limited to bi-monthly service charges, installation charges and removal charges.

According to PUD, Code Compliance officers in the Department issue Administrative Citations or Administrative Warnings when they are able to confirm the theft of water from fire hydrants.

Airport Vendors Are Not Exempt from the City's Fire Hydrant Meter Program

Some City fire hydrants are connected to a large master water meter that records the volume of water drawn. The large master water meters allow City departments to be billed for water used. However, regardless of whether or not the water drawn from a fire hydrant is metered by a large master water meter, airport vendors are not exempt from the requirement that they use an approved City fire hydrant water meter and pay for the water that they use. The large master water meters merely account for the volume of water that is used.

According to PUD, water mains that belong to PUD feed all of the fire hydrants located at Montgomery Field. These hydrants are not associated with large master water meters. As such, use of any of the fire hydrants would be considered taking water without authorization through an unmetered connection.

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The Brown Field hydrants that are located on the east side of the airport, including a hydrant in front of the control tower which was identified through the course of our investigation as being used by the vendor, are associated with master water meters. As such, the Airports Division pays for the amount of water used by the hydrant. PUD noted that the hydrants located to the west of the airport are not connected to a large master water meter and are not billed to the Airports Division.

Image 1, below, which we obtained from Google Street View, depicts an unrelated City vendor filling a truck with water from a City fire hydrant at Brown Field. PUD staff confirmed that the fire hydrant attachments shown in the image appear to be a City-issued mobile fire hydrant water meter with a properly installed reduced pressure backflow preventer assembly and an air gap on the water truck. Note that although this particular fire hydrant is associated with a large master water meter, airport vendors are not exempt from complying with the City's Fire Hydrant Meter Program, as the vendor shown below is doing.

Image 1

Unrelated Vendor Filling a Truck with Water from a City Fire Hydrant



Source: Google Street View, April 2016

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Prior Contract Did Not Address Water Use

Our investigation determined that the vendor's prior contract did not contain any reference to the City's Fire Hydrant Meter Program, and did not address payment for water use. In fact, the only reference to water use associated with the contract was provided by the vendor's proposal, which stated, "We will properly use the hydrants or other water sources and pay for all water used as part of our operation." It is not clear if the proposal's reference to proper use of fire hydrants and payments for water would be legally sufficient to bind the vendor and require that they pay for water that they used in the past.

Current Invitation to Bid Does Not Address Water Use

The City recently began advertising a new contract for the same airport services at Montgomery Field and Brown Field. However, the new invitation to bid did not include a reference to the City's Fire Hydrant Meter Program. As of the date of this Fraud Hotline Report, City staff had not included the water use information in the draft amendment to the contract.

Airports Division Staff Did Not Require Hydrant Meter Use

Our investigation determined that City staff from the Airports Division did not require the vendor to obtain and use a fire hydrant water meter. This appears to have been a past practice dating back several years. According to the vendor's CEO, the practice has been in place for approximately 10 years. The Airports Division staff we interviewed were not aware of the City's Fire Hydrant Meter Program.

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Conclusion

Our investigation confirmed the Fraud Hotline complainant's allegation that the vendor had been using water from City hydrants for several years without using a meter and paying for the water used. This practice has been permitted by Airports Division staff for approximately 10 years.

According to interviews with PUD staff, it is unlawful to use City water from a fire hydrant without obtaining and using a fire hydrant meter. Although some of the references in the City's Fire Hydrant Meter Program are not current, the procedure outlined in the document accurately describes how the program currently works. While some hydrants are connected to large master meters that record the amount of water used, all City vendors are still required to pay for the water they use. According to SDMC §67.0212(b), using water from a fire hydrant for purposes other than extinguishing a fire is unlawful "regardless of knowledge or intent." PUD staff issue Administrative Citations or Administrative Warnings when they are able to confirm the theft of water from fire hydrants.

Recommendations and Management's Responses (see Attachment B for definitions of Fraud Hotline recommendation priorities)

- 1. We recommend that the Public Utilities Department's Customer Support Division conduct an investigation to determine if an Administrative Citation or Administrative Warning is warranted based on the information contained in the confidential version of this report and take the appropriate action (Priority 1).**

Management Response: Agree

The Public Utilities Customer Support Division will conduct the investigation to determine if an Administrative Citation or Administrative Warning is warranted based on the information contained in the confidential version of the report and take the appropriate action.

Target Implementation Date: June 30, 2018

- 2. We recommend that the Public Utilities Department update the Fire Hydrant Meter Program to reflect the current SDMC references and any other changes to the program (Priority 3).**

Management Response: Agree

The Public Utilities Department will update the Fire Hydrant Meter Program Departmental Instruction to reflect appropriate SDMC and other changes to the program.

Target Implementation Date: December 31, 2018

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3. **We recommend that the Public Utilities Department, in consultation with the Office of the City Attorney, determine if the costs of water use related to the 2012, and prior contracts, should be recovered from the vendor, and take the appropriate action (Priority 2).**

Management Response: Agree

Since the operation of the water system and water billing is the responsibility of the Public Utilities Department, the Public Utilities Department will take the lead on determining the cost of water use in consultation with the Office of the City Attorney and if warranted pursue the appropriate action with the Real Estate Assets Department.

Target Implementation Date: July 1, 2018

4. **We recommend that the Airports Division of the Real Estate Assets Department include the Public Utilities Department's Fire Hydrant Meter Program as an addendum to the new contract, or otherwise address payment for water use (Priority 1).**

Management Response: Agree

Contractor shall be responsible for ensuring that all [equipment] contain the necessary amount of water required for the performance of this Contract. In the event that additional water is necessary to complete a given [service] activity, Contractor shall be permitted, with prior approval by the Airport Manager, to re-fill the [equipment] with water from a City-owned fire hydrant at the Airport(s), but only if Contractor is in compliance with the following: 1) Contractor has Fire Hydrant Construction Meter(s) installed on all [equipment] requested to be re-filled; 2) Contractor bears the costs of any necessary water refills; and 3) San Diego Municipal Code section 67.0212 and Attachment 4: City of San Diego California Department Instruction 55.27, as may be amended, and attached hereto.

Target Implementation Date: June 30, 2018

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The information in this report is being provided to you under the authority of California Government Code §53087.6, which states:

(e) (2) Any investigative audit conducted pursuant to this subdivision shall be kept confidential, except to issue any report of an investigation that has been substantiated, or to release any findings resulting from a completed investigation that are deemed necessary to serve the interests of the public. In any event, the identity of the individual or individuals reporting the improper government activity, and the subject employee or employees shall be kept confidential.

(3) Notwithstanding paragraph (2), the auditor or controller may provide a copy of a substantiated audit report that includes the identities of the subject employee or employees and other pertinent information concerning the investigation to the appropriate appointing authority for disciplinary purposes. The substantiated audit report, any subsequent investigatory materials or information, and the disposition of any resulting disciplinary proceedings are subject to the confidentiality provisions of applicable local, state, and federal statutes, rules, and regulations.

Thank you for taking action on this issue.

Respectfully submitted,

A handwritten signature in black ink, reading "Eduardo Luna". The signature is fluid and cursive, with the first letter of "Eduardo" being a large capital "E" and the last letter of "Luna" being a capital "L".

Eduardo Luna
City Auditor

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Attachment A – Fire Hydrant Meter Program

CITY OF SAN DIEGO CALIFORNIA DEPARTMENT INSTRUCTIONS	NUMBER DI 55.27	DEPARTMENT Water Department
SUBJECT FIRE HYDRANT METER PROGRAM (FORMERLY: CONSTRUCTION METER PROGRAM)	PAGE 1 OF 10	EFFECTIVE DATE October 15, 2002
	SUPERSEDES DI 55.27	DATED April 21, 2000

1. **PURPOSE**

- 1.1 To establish a Departmental policy and procedure for issuance, proper usage and charges for fire hydrant meters.

2. **AUTHORITY**

- 2.1 All authorities and references shall be current versions and revisions.
- 2.2 San Diego Municipal Code (NC) Chapter VI, Article 7, Sections 67.14 and 67.15
- 2.3 Code of Federal Regulations, Safe Drinking Water Act of 1986
- 2.4 California Code of Regulations, Titles 17 and 22
- 2.5 California State Penal Code, Section 498B.0
- 2.6 State of California Water Code, Section 110, 500-6, and 520-23
- 2.7 Water Department Director

Reference

- 2.8 State of California Guidance Manual for Cross Connection Programs
- 2.9 American Water Works Association Manual M-14, Recommended Practice for Backflow Prevention
- 2.10 American Water Works Association Standards for Water Meters
- 2.11 U.S.C. Foundation for Cross Connection Control and Hydraulic Research Manual

3. **DEFINITIONS**

- 3.1 **Fire Hydrant Meter:** A portable water meter which is connected to a fire hydrant for the purpose of temporary use. (These meters are sometimes referred to as Construction Meters.)

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3.2 **Temporary Water Use:** Water provided to the customer for no longer than twelve (12) months.

3.3 **Backflow Preventor:** A Reduced Pressure Principal Assembly connected to the outlet side of a Fire Hydrant Meter.

4. **POLICY**

4.1 The Water Department shall collect a deposit from every customer requiring a fire hydrant meter and appurtenances prior to providing the meter and appurtenances (see Section 7.1 regarding the Fees and Deposit Schedule). The deposit is refundable upon the termination of use and return of equipment and appurtenances in good working condition.

4.2 Fire hydrant meters will have a 2 ½" swivel connection between the meter and fire hydrant. The meter shall not be connected to the 4" port on the hydrant. All Fire Hydrant Meters issued shall have a Reduced Pressure Principle Assembly (RP) as part of the installation. Spanner wrenches are the only tool allowed to turn on water at the fire hydrant.

4.3 The use of private hydrant meters on City hydrants is prohibited, with exceptions as noted below. All private fire hydrant meters are to be phased out of the City of San Diego. All customers who wish to continue to use their own fire hydrant meters must adhere to the following conditions:

- a. Meters shall meet all City specifications and American Water Works Association (AWWA) standards.
- b. Customers currently using private fire hydrant meters in the City of San Diego water system will be allowed to continue using the meter under the following conditions:
 1. The customer must submit a current certificate of accuracy and calibration results for private meters and private backflows annually to the City of San Diego, Water Department, Meter Shop.

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2. The meter must be properly identifiable with a clearly labeled serial number on the body of the fire hydrant meter. The serial number shall be plainly stamped on the register lid and the main casing. Serial numbers shall be visible from the top of the meter casing and the numbers shall be stamped on the top of the inlet casing flange.
3. All meters shall be locked to the fire hydrant by the Water Department, Meter Section (see Section 4.7).
4. All meters shall be read by the Water Department, Meter Section (see Section 4.7).
5. All meters shall be relocated by the Water Department, Meter Section (see Section 4.7).
6. These meters shall be tested on the anniversary of the original test date and proof of testing will be submitted to the Water Department, Meter Shop, on a yearly basis. If not tested, the meter will not be allowed for use in the City of San Diego.
7. All private fire hydrant meters shall have backflow devices attached when installed.
8. The customer must maintain and repair their own private meters and private backflows.
9. The customer must provide current test and calibration results to the Water Department, Meter Shop after any repairs.
10. When private meters are damaged beyond repair, these private meters will be replaced by City owned fire hydrant meters.

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11. When a private meter malfunctions, the customer will be notified and the meter will be removed by the City and returned to the customer for repairs. Testing and calibration results shall be given to the City prior to any re-installation.
 12. The register shall be hermetically sealed straight reading and shall be readable from the inlet side. Registration shall be in hundred cubic feet.
 13. The outlet shall have a 2 ½ "National Standards Tested (NST) fire hydrant male coupling.
 14. Private fire hydrant meters shall not be transferable from one contracting company to another (i.e. if a company goes out of business or is bought out by another company).
- 4.4 All fire hydrant meters and appurtenances shall be installed, relocated and removed by the City of San Diego, Water Department. All City owned fire hydrant meters and appurtenances shall be maintained by the City of San Diego, Water Department, Meter Services.
- 4.5 If any fire hydrant meter is used in violation of this Department Instruction, the violation will be reported to the Code Compliance Section for investigation and appropriate action. Any customer using a fire hydrant meter in violation of the requirements set forth above is subject to fines or penalties pursuant to the Municipal Code, Section 67.15 and Section 67.37.
- 4.6 **Conditions and Processes for Issuance of a Fire Hydrant Meter**
- Process for Issuance
- a. Fire hydrant meters shall only be used for the following purposes:
1. Temporary irrigation purposes not to exceed one year.

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2. Construction and maintenance related activities (see Tab 2).
 - b. No customer inside or outside the boundaries of the City of San Diego Water Department shall resell any portion of the water delivered through a fire hydrant by the City of San Diego Water Department.
 - c. The City of San Diego allows for the issuance of a temporary fire hydrant meter for a period not to exceed 12 months (365 days). An extension can only be granted in writing from the Water Department Director for up to 90 additional days. A written request for an extension by the consumer must be submitted at least 30 days prior to the 12 month period ending. No extension shall be granted to any customer with a delinquent account with the Water Department. No further extensions shall be granted.
 - d. Any customer requesting the issuance of a fire hydrant meter shall file an application with the Meter Section. The customer must complete a "Fire Hydrant Meter Application" (Tab 1) which includes the name of the company, the party responsible for payment, Social Security number and/or California ID, requested location of the meter (a detailed map signifying an exact location), local contact person, local phone number, a contractor's license (or a business license), description of specific water use, duration of use at the site and full name and address of the person responsible for payment.
 - e. At the time of the application the customer will pay their fees according to the schedule set forth in the Rate Book of Fees and Charges, located in the City Clerk's Office. All fees must be paid by check, money order or cashiers check, made payable to the City Treasurer. Cash will not be accepted.
 - f. No fire hydrant meters shall be furnished or relocated for any customer with a delinquent account with the Water Department.
 - g. After the fees have been paid and an account has been created, the

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meter shall be installed within 48 hours (by the second business day). For an additional fee, at overtime rates, meters can be installed within 24 hours (within one business day).

4.7 Relocation of Existing Fire Hydrant Meters

- a. The customer shall call the Fire Hydrant Meter Hotline (herein referred to as "Hotline"), a minimum of 24 hours in advance, to request the relocation of a meter. A fee will be charged to the existing account, which must be current before a work order is generated for the meter's relocation.
- b. The customer will supply in writing the address where the meter is to be relocated (map page, cross street, etc). The customer must update the original Fire Hydrant Meter Application with any changes as it applies to the new location.
- c. Fire hydrant meters shall be read on a monthly basis. While fire hydrant meters and backflow devices are in service, commodity, base fee and damage charges, if applicable, will be billed to the customer on a monthly basis. If the account becomes delinquent, the meter will be removed.

4.8 Disconnection of Fire Hydrant Meter

- a. After ten (10) months a "Notice of Discontinuation of Service" (Tab 3) will be issued to the site and the address of record to notify the customer of the date of discontinuance of service. An extension can only be granted in writing from the Water Department Director for up to 90 additional days (as stated in Section 4.6C) and a copy of the extension shall be forwarded to the Meter Shop Supervisor. If an extension has not been approved, the meter will be removed after twelve (12) months of use.
- b. Upon completion of the project the customer will notify the Meter Services office via the Hotline to request the removal of the fire hydrant meter and appurtenances. A work order will be generated

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for removal of the meter.

- c. Meter Section staff will remove the meter and backflow prevention assembly and return it to the Meter Shop. Once returned to the Meter Shop the meter and backflow will be tested for accuracy and functionality.
- d. Meter Section Staff will contact and notify Customer Services of the final read and any charges resulting from damages to the meter and backflow or its appurtenance. These charges will be added on the customer's final bill and will be sent to the address of record. Any customer who has an outstanding balance will not receive additional meters.
- e. Outstanding balances due may be deducted from deposits and any balances refunded to the customer. Any outstanding balances will be turned over to the City Treasurer for collection. Outstanding balances may also be transferred to any other existing accounts.

5. **EXCEPTIONS**

- 5.1 Any request for exceptions to this policy shall be presented, in writing, to the Customer Support Deputy Director, or his/her designee for consideration.

6. **MOBILE METER**

- 6.1 Mobile meters will be allowed on a case by case basis. All mobile meters will be protected by an approved backflow assembly and the minimum requirement will be a Reduced Pressure Principal Assembly. The two types of Mobile Meters are vehicle mounted and floating meters. Each style of meters has separate guidelines that shall be followed for the customer to retain service and are described below:
 - a) **Vehicle Mounted Meters:** Customer applies for and receives a City owned Fire Hydrant Meter from the Meter Shop. The customer mounts the meter on the vehicle and brings it to the Meter Shop for

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inspection. After installation is approved by the Meter Shop the vehicle and meter shall be brought to the Meter Shop on a monthly basis for meter reading and on a quarterly basis for testing of the backflow assembly. Meters mounted at the owner's expense shall have the one year contract expiration waived and shall have meter or backflow changed if either fails.

- b) **Floating Meters:** Floating Meters are meters that are not mounted to a vehicle. **(Note: All floating meters shall have an approved backflow assembly attached.)** The customer shall submit an application and a letter explaining the need for a floating meter to the Meter Shop. The Fire Hydrant Meter Administrator, after a thorough review of the needs of the customer, (i.e. number of jobsites per day, City contract work, lack of mounting area on work vehicle, etc.), may issue a floating meter. At the time of issue, it will be necessary for the customer to complete and sign the "Floating Fire Hydrant Meter Agreement" which states the following:

- 1) The meter will be brought to the Meter Shop at 2797 Caminito Chollas, San Diego on the third week of each month for the monthly read by Meter Shop personnel.
- 2) Every other month the meter will be read and the backflow will be tested. This date will be determined by the start date of the agreement.

If any of the conditions stated above are not met the Meter Shop has the right to cancel the contract for floating meter use and close the account associated with the meter. The Meter Shop will also exercise the right to refuse the issuance of another floating meter to the company in question.

Any Fire Hydrant Meter using reclaimed water shall not be allowed use again with any potable water supply. The customer shall incur the cost of replacing the meter and backflow device in this instance.

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7. **FEE AND DEPOSIT SCHEDULES**

- 7.1 **Fees and Deposit Schedules:** The fees and deposits, as listed in the Rate Book of Fees and Charges, on file with the Office of the City Clerk, are based on actual reimbursement of costs of services performed, equipment and materials. These deposits and fees will be amended, as needed, based on actual costs. Deposits, will be refunded at the end of the use of the fire hydrant meter, upon return of equipment in good working condition and all outstanding balances on account are paid. Deposits can also be used to cover outstanding balances.

All fees for equipment, installation, testing, relocation and other costs related to this program are subject to change without prior notification. The Mayor and Council will be notified of any future changes.

8. **UNAUTHORIZED USE OF WATER FROM A HYDRANT**

- 8.1 Use of water from any fire hydrant without a properly issued and installed fire hydrant meter is theft of City property. Customers who use water for unauthorized purposes or without a City of San Diego issued meter will be prosecuted.
- 8.2 If any unauthorized connection, disconnection or relocation of a fire hydrant meter, or other connection device is made by anyone other than authorized Water Department personnel, the person making the connection will be prosecuted for a violation of San Diego Municipal Code, Section 67.15. In the case of a second offense, the customer's fire hydrant meter shall be confiscated and/or the deposit will be forfeited.
- 8.3 Unauthorized water use shall be billed to the responsible party. Water use charges shall be based on meter readings, or estimates when meter readings are not available.
- 8.4 In case of unauthorized water use, the customer shall be billed for all applicable charges as if proper authorization for the water use had been obtained, including but not limited to bi-monthly service charges, installation charges and removal charges.

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- 8.5 If damage occurs to Water Department property (i.e. fire hydrant meter, backflow, various appurtenances), the cost of repairs or replacements will be charged to the customer of record (applicant).

Water Department Director

- Tabs: 1. Fire Hydrant Meter Application
2. Construction & Maintenance Related Activities With No Return To Sewer
3. Notice of Discontinuation of Service

APPENDIX

Administering Division: Customer Support Division

Subject Index: Construction Meters
Fire Hydrant
Fire Hydrant Meter Program
Meters, Floating or Vehicle Mounted
Mobile Meter
Program, Fire Hydrant Meter

Distribution: DI Manual Holders

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Application for Fire Hydrant Meter (EXHIBIT A)

(For Office Use Only)

NSREQ	FAC#
DATE	BY

METER SHOP (619) 527-7449

Meter Information

Application Date	Requested Install Date:
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Fire Hydrant Location (Attach Detailed Map// Thomas Bros. Map Location or Construction drawing)	T.B.	G.B. (CITY USE)
Zip:		
Specific Use of Water:		
Any Return to Sewer or Storm Drain, If so, explain:		
Estimated Duration of Meter Use:		<input type="checkbox"/> Check Box if Reclaimed Water

Company Information

Company Name:			
Mailing Address:			
City:	State:	Zip:	Phone: ()
*Business license#		*Contractor license#	
A Copy of the Contractor's license OR Business License is required at the time of meter issuance.			
Name and Title of Billing Agent: (PERSON IN ACCOUNTS PAYABLE)			Phone: ()
Site Contact Name and Title:			Phone: ()
Responsible Party Name:			Title:
Cal ID#			Phone: ()
Signature:		Date:	
Guarantees Payment of all Charges Resulting from the use of this Meter. Insures that employees of this Organization understand the proper use of Fire Hydrant Meter			

Fire Hydrant Meter Removal Request		Requested Removal Date:
Provide Current Meter Location if Different from Above:		
Signature:		Title: Date:
Phone: ()		Pager: ()

<input type="checkbox"/> City Meter	<input type="checkbox"/> Private Meter
Contract Acct #:	Deposit Amount: \$ 936.00 Fees Amount: \$ 62.00
Meter Serial #	Meter Size: 05 Meter Make and Style: 6-7
Backflow #	Backflow Size: Backflow Make and Style:
Name:	Signature: Date:

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Tab 2 to DI 55.27

WATER USES WITHOUT ANTICIPATED CHARGES FOR RETURN TO SEWER

Auto Detailing
Backfilling
Combination Cleaners (Vactors)
Compaction
Concrete Cutters
Construction Trailers
Cross Connection Testing
Dust Control
Flushing Water Mains
Hydro Blasting
Hydro Sealing
Irrigation (for establishing irrigation only; not continuing irrigation)
Mixing Concrete
Mobile Car Washing
Special Events
Street Sweeping
Water Tanks
Water Trucks
Window Washing

Note:

1. If there is any return to sewer or storm drain, then sewer and/or storm drain fees will be charges.

Fraud Hotline Investigation of Water Theft

Tab 3 to DI 55.27

Date

Name of Responsible Party
Company Name and Address
Account Number: _____

Subject: Discontinuation of Fire Hydrant Meter Service

Dear Water Department Customer:

The authorization for use of Fire Hydrant Meter # _____, located at *(Meter Location Address)* ends in 60 days and will be removed on or after *(Date Authorization Expires)*. Extension requests for an additional 90 days must be submitted in writing for consideration 30 days prior to the discontinuation date. If you require an extension, please contact the Water Department, or mail your request for an extension to:

City of San Diego
Water Department
Attention: Meter Services
2797 Caminito Chollas
San Diego, CA 92105-5097

Should you have any questions regarding this matter, please call the Fire Hydrant Hotline at (619) _____ - _____.

Sincerely,

Water Department

Fraud Hotline Investigation of Water Theft

Attachment B – Definition of Fraud Hotline Recommendation Priorities

DEFINITIONS OF PRIORITY 1, 2, AND 3
FRAUD HOTLINE RECOMMENDATIONS

The Office of the City Auditor maintains a priority classification scheme for Fraud Hotline recommendations based on the importance of each recommendation to the City, as described in the table below. While the City Auditor is responsible for providing a priority classification for recommendations, it is the City Administration's responsibility to establish a target date to implement each recommendation taking into considerations its priority. The City Auditor requests that target dates be included in the Administration's official response to the findings and recommendations.

Priority Class¹	Description
1	Fraud or serious violations are being committed. Significant fiscal and/or equivalent non-fiscal losses are occurring. Costly and/or detrimental operational inefficiencies are taking place. A significant internal control weakness has been identified.
2	The potential for incurring significant fiscal and/or equivalent non-fiscal losses exists. The potential for costly and/or detrimental operational inefficiencies exists. The potential for strengthening or improving internal controls exists.
3	Operation or administrative process will be improved.

¹ The City Auditor is responsible for assigning Fraud Hotline recommendation priority class numbers. A recommendation which clearly fits the description for more than one priority class shall be assigned the higher number.