

City of San Diego Response to San Diego County Grand Jury Report
Entitled
Don't Give Me a Break: Water Distribution Problems in the City of San Diego

Pursuant to California Penal Code Section §933(c), the City of San Diego provides the following responses to the findings and recommendations included in the above referenced Grand Jury Report:

FINDINGS

Finding 01: Not all SDPUD first responders are state certified.

Response: PUD agrees with the finding.

The Public Utilities Department (PUD) requires all employees who operate, repair and/or maintain the City's water distribution system to obtain, possess, and maintain California Department of Public Health (CDPH) Water Distribution Operator certification. While there may be first responders that are not state certified, any and all decisions addressing the shutdown and repair of broken mains, in addition to disinfecting and testing of new or repaired water mains, are made by certified PUD personnel as per Section 63770 (b) of CDPH document "California Regulations Related to Drinking Water". This is also described in the City's response to Grand Jury Recommendation 14-52.

Finding 02: Emergency Service personnel could frequently get to a disruption of service faster if they possessed department supplied GPS devices.

Response: PUD agrees with the finding.

While many of the PUD Emergency Service Section personnel are familiar with the urban geography of the City, either GPS devices or laptop computers could be used to get better directions to the reported water emergencies. As also stated in the response to Grand Jury Recommendation 14-53, PUD is currently working to provide its Emergency Services Section with either GPS devices or laptop computers that could be used to get directions to the reported water emergencies. This recommendation is expected to be implemented by December 31, 2014.

Finding 03: First responders do not have access to the most up to date information, which may slow response time.

Response: PUD partially disagrees with the finding.

As stated in the response to Grand Jury Recommendation 14-54, in Fiscal Year 2014 PUD started implementing a 2-year program to equip all emergency first responders, maintenance crews, and construction crews with laptop computers. To date, PUD has

purchased 15 laptops and is in the process of purchasing an additional 70 during Fiscal Year 2015. All laptops will have access to SPLASH by December 31, 2014, and the Emergency Response Section will be equipped with laptops. The maintenance crews and construction crews will be equipped with laptops by June 30, 2015.

Finding 04: SDPUD is not able to adequately judge its performance with its current record keeping process.

Response: PUD partially disagrees with the finding.

As stated in the response to Grand Jury Recommendation 14-55, PUD has implemented a new process to track the water main break response time. PUD has a goal of responding to breaks within 30 minutes of the report. The process documents on-site activities for breaks from the time the emergency call is received until the repair is completed and the water service is restored. This process was implemented on August 1, 2014.

Furthermore, PUD is working on implementing a greatly improved asset management system. The Enterprise Asset Management (EAM) solution will be used for both maintenance management of the infrastructure assets, including work order management for preventative maintenance and corrective repair activities, and for the capital asset management of that same infrastructure, including renewal and replacement planning. PUD is implementing this EAM solution to replace multiple legacy maintenance management systems with a comprehensive and integrated asset and work management solution. The EAM solution is expected to be implemented by June 30, 2017.

Finding 05: SDPUD is on track to eliminate all remaining cast iron pipes. In fact, they are ahead of schedule.

Response: PUD agrees with the finding.

PUD is expeditiously replacing the remaining cast iron water lines in the distribution system with PVC pipes and expects to complete the replacement in 2017-2018. Please refer to response to Grand Jury Recommendation 14-58 for a full explanation of the replacement schedule for the water distribution system.

Finding 06: In the unlikely event that SDPUD accomplishes a 40 miles per year replacement rate, replacement of even the newest asbestos cement pipe will be scheduled significantly beyond the end of its predicted service life.

Response: PUD partially disagrees with the finding.

As indicated in the response to Recommendation 14-58, PUD has hired a consulting firm to assess the condition of over 2,100 miles of Asbestos Cement (AC) mains. Based on the latest technology, the consulting firm will accurately predict the remaining service life of all asbestos cement mains.

Finding 07: SDPUD needs to aggressively speed up its planning for AC pipe replacement.

Response: PUD agrees with the finding.

PUD, in working with the Public Works Department, started the engineering work to replace most deteriorated AC water mains (approximately 80 miles) in October 2012. Some of these water mains are currently in the design phase for replacement and construction will begin in 2015-2016. To further accelerate the AC mains replacement, PUD and Public Works are strategizing creative ways to indentify and plan an additional 150-200 miles of AC mains for replacement between 2017 and 2020. Concurrently, PUD has hired a consulting firm to assess the condition of 2,100 miles of AC mains. Based on the latest technology, the consulting firm will accurately predict the remaining service life of all asbestos cement mains. This effort will likely lead to additional main replacement projects to be implemented after 2020.

RECOMMENDATIONS

Recommendation 14-52: *Institute a program to ensure that all water distribution operators are state certified, paying for training if necessary.*

Response: The City agrees with this recommendation.

The certification requirements and certification fee reimbursement program that is currently being implemented by the Public Utilities Department (PUD) is consistent with this recommendation. Currently, PUD requires all employees who operate, repair and/or maintain the City's water distribution system to obtain, possess, and maintain California Department of Public Health (CDPH) Water Distribution Operator certification. Formalized training is offered to PUD personnel who are required to be certified. In addition, PUD reimburses employees for certification exam fees, certification fees, and certification renewal fees.

All decisions addressing the shutdown and repair of broken mains, in addition to disinfecting and testing of new or repaired water mains, are made by certified PUD personnel as per Section 63770 (b) of CDPH document "California Regulations Related to Drinking Water". New employees are required to obtain the certification within two years of hire. If they do not meet this requirement they must vacate their classification.

Recommendation 14-53: *Equip all water emergency response vehicles with GPS devices.*

Response: The City agrees with this recommendation.

PUD will provide its Emergency Services Section with either GPS devices or laptop computers that could be used to get directions to the reported water emergencies. This recommendation is expected to be implemented by December 31, 2014.

Recommendation 14-54: *Equip all emergency first responders with computers and online access to the SPLASH system.*

Response: The City agrees with this recommendation.

In FY 2014, PUD started implementing a 2-year program to equip all emergency first responders, maintenance crews, and construction crews with laptop computers. To date, PUD has purchased 15 laptops and is in the process of purchasing an additional 70 laptops during FY 15. All laptops will have access to SPLASH by December 31, 2014, and the Emergency Response Section will also be equipped with laptops. The maintenance crews and construction crews are expected to be equipped with laptops by June 30, 2015.

Recommendation 14-55: *Replace paper break reports with a modern computer based reporting system, thereby facilitating tracking problems and trends.*

Response: The City agrees with this recommendation.

PUD is working on implementing a cost effective, robust, and flexible Asset Management System. The Enterprise Asset Management (EAM) solution will be used both for maintenance management of the infrastructure assets, including work order management for preventive maintenance and corrective repair activities, and for the capital asset management of that same infrastructure, including renewal and replacement planning. PUD is implementing this EAM solution to replace multiple legacy maintenance management systems with a comprehensive and integrated asset and work management solution. The EAM solution is expected to be implemented by June 30, 2017.

In addition, PUD will implement a new process to track the Water Main Break response time. The process will document on site activities for main breaks from the time the emergency call comes in until the repair is completed and the water service is restored. This new process will provide the tools needed to accurately measure performance during a main break. This process will be implemented this fall.

Recommendation 14-56: *Verify that any water distribution infrastructure on “As-Built” drawings is, in fact, as-built.*

Response: The City agrees with this recommendation.

PUD will implement a formal procedure to ensure that all field discoveries related to the water system are conveyed in a timely manner to the Asset Management Program – GIS Section which maintains the GIS (SPLASH) information. The formalization of existing procedures will ensure that all parties are aware of their roles and responsibilities within PUD regarding GIS information maintenance. This procedure is expected to be implemented by October 31, 2014.

The Asset Management Program – GIS Section currently tracks Public Works’ managed Capital Improvement Program (CIP) projects to ensure that as-built plans are being submitted to the GIS section. Tracking is performed via notifications from the Public

Works' SharePoint site. A spreadsheet with this information, as well as the related SPLASH assignments, is maintained by the GIS Section. The GIS Section receives an email notification whenever a project in the Public Works' SharePoint site is updated. This is the normal trigger system that is used to notify the section that information needs to be entered into SPLASH.

Recommendation 14-57: *Inspect all street repaving and resurfacing projects upon completion to assure that no valves have been paved over.*

Response: The City agrees with this recommendation.

On February 3, 2014, PUD started conducting field investigations before and after any new street is paved or resurfaced to ensure that no water valves in the street are buried or paved over. PUD is currently working with the Street Division to get a list of all City streets that have been paved in the past four years and will conduct a walk-through inspection to ensure that no valves are buried or paved over. This is expected to be underway by September 1, 2014.

Recommendation 14-58: *Accelerate the replacement of asbestos cement water mains with PVC.*

Response: The City agrees with this recommendation.

PUD is replacing the remaining Cast Iron water mains in the system with PVC pipes and expects to complete the replacement in 2017-2018. In addition, PUD, in working with the Public Works Department, started the engineering work to replace most deteriorated Asbestos Cement (AC) water mains, which is approximately 80 miles, in October 2012. Some of these water mains are currently in the design phase for replacement and construction will begin in 2015-2016. To further accelerate the AC mains replacement, PUD and Public Works are strategizing creative ways to indentify and plan an additional 150-200 miles of AC mains' for replacement between 2017 and 2020. Concurrently, PUD has hired a consulting firm to assess the condition of 2,100 miles of AC mains. This effort will lead to additional main replacement projects to be implemented after 2020.

Recommendation 14-59: *Begin alerting the ratepayers to the probable impact of the asbestos cement water main replacement program on water rates.*

Response: The City agrees with this recommendation.

PUD puts an emphasis on informing ratepayers of upcoming rate increases attributed to the increased costs of capital investment. A portion of the AC mains replacement, as stated in Response to Recommendation 14-58, is included in the current rate case and therefore included in the overall Proposition 218 Notice issued in November 2013. The current rate case covers 2014-2015. During the last Cost of Service Study and rate increase process, PUD held numerous open meetings with interested parties, presented in public meetings of the Independent Rates Oversight Committee (IROC), as well as the

Metro Commission. Additionally, PUD presented to the Taxpayers Association and the Building Owners and Managers Association. In accordance with Proposition 218, a “Notice of Public Hearing” was sent to all Water customers prior to October 5, 2013. Additionally, 13 community presentations across all nine Council Districts have been completed and two more were scheduled prior to the November 21, 2013 San Diego City Council hearing. PUD will continue informing ratepayers about the cost increase associated with the AC mains replacement when the next rate case study is finalized, which is expected to be in spring 2015. Comprehensive and frequent public outreach meetings will be held to ensure ratepayers are informed.

Recommendation 14-60: *Request an independent performance audit by the San Diego City Auditor.*

Response: **This recommendation is not warranted because of oversight currently provided by the City Auditor and Independent Rates Oversight Committee (IROC).**

Annually, the City Auditor’s Office conducts a city-wide risk assessment which is used to establish the annual audit plans. Additionally, input from the City Council and IROC is considered when establishing the annual audit work plan.

The IROC serves as an official advisory board to the Mayor and City Council on policy issues relating to the oversight of PUD operations. This includes, but is not limited to, resource management, planned expenditures, service delivery methods, and public awareness and outreach efforts. In addition, IROC was established to assist the City in tracking and reviewing the use of rate proceeds to advance the capital improvements related to rate packages and work programs adopted by the City Council. PUD has worked and will continue to work closely with the Office of the City Auditor on numerous performance audits related to its operation. Internally, PUD monitors completion of recommendations resulting from each audit and verifies that actions implemented to satisfy these recommendations are effective. Additionally, each recommendation is recorded and tracked in an internal database to ensure agreed-upon deadlines are met.

PUD continuously evaluates its functions and services, and conducts quality control/quality assurance of all aspects of its operation. In addition, PUD has been conducting efficiency studies since the summer of 2010. The purpose of the efficiency studies is to examine different functions and services in PUD for opportunities to increase efficiency and effectiveness.