**Wholesale Supplier BMP 1:**

**Establishing Requirements for Customer Water Conservation Plans and Drought Contingency Plans**

**Applicability**

* Per the 288 rules, Wholesale Water providers (WWP) that must include a requirement in every wholesale water supply contract entered into that each successive wholesale customer develop and implement a water conservation plan or water conservation measures.
* WWP that may desire to establish customer requirements for any type of water use, not just municipal use.

**Description**

* WWP requires WCP/DCP for all new and amended contracts above a small minimum acre-feet use such as 10 acft, which includes all types of use (municipal, industrial, irrigation, recreation, agricultural) and includes smaller utilities not required to submit plans to TCEQ
* WWP staff review WCP/DCP, screen for minimum requirements, encourage additional measures
* Helpful with managing regional droughts

**Implementation**

* The WWP should have dedicated staff resources such as a wholesale water conservation coordinator to provide technical assistance on water conservation and drought contingency plan development as well as to review and accept the plans.
* Develop and adopt water conservation plan (WCP) rules as part of Administrative Rules for water Contracts
  + Require all required measures in TAC 288 rules
  + Through staff technical assistance, promote adoption of additional water conservation measures such as: fixture replacement programs, ordinance or deed restrictions requiring landscape irrigation standards, soil depth requirements
  + Consider adding additional requirements for contracts with either a volume or number of connections about a certain threshold level.
* Develop and adopt drought contingency plan (DCP) rules as part of Administrative Rules for water Contracts
  + Require all required measures in TAC 288 rules
  + For mandatory trigger levels, include limits on daytime irrigation and limits on outdoor watering to twice or once per week, depending on the severity of the drought stage.
  + Require triggers and response measures for reduction in water supply (not just capacity). Water supply triggers should be consistent between the WWP and the WWP customer.
  + Specific quantified targets for water use reduction tied back to WWP’s DCP
* Incorporate WCP/DCP approval into the water contracting process
* Develop a tracking tool and require customers to report each year on WCP/DCP implementation. The tracking tool could compliment the state’s reporting tool, providing additional information that is not required by the state for those customers that must also report to the state.
* Consider developing and adopting penalties for non-compliance.

**Scope & Schedule**

* WWP develops WCP/DCP rules
* WWP customers provide input and feedback on rules
* Rules approves by WWP official governing body (Board/Council)
* Begin implementation with new or amended water contracts within three months of official adoption
* Implementation reporting can be required less frequently than yearly but may be less effective and the quality of information may reduce over time
* BMP considered complete with or without penalties for non-compliance

**Measuring Implementation and Determining Water Savings**

* Create a database listing specific plan elements and which stage they occur in (for DCP) to facilitate the ability to create summary documents on what is being done throughout the WWP’s service area
* WWP compile information on drought plan implementation
* WWP conduct yearly WCP implementation survey to determine savings from implementation of individual plan elements

**Cost-Effectiveness Considerations**

* Depending on frequency and size of new contracts 0.5 to 1 FTE needed for a mid-large size WWP

**References for Additional Information**

* TCEQ WCP/DCP rules
* LCRA WCP/DCP rules

**Determination of the Impact on Other Resources**

* This BMP lays the groundwork for other BMPs that the WWP customer will implement
* WWPs cannot generally save water by themselves unless they also own/operate retail utilities- they must save water through collaboration with retail customers and other water users.

**Acknowledgments**

* LCRA