

**SANTA YNEZ RIVER WATER
CONSERVATION DISTRICT**

Rate Study Report

REVISED DRAFT FINAL REPORT / June 22, 2023

June 22, 2023

Mr. Kevin Walsh
General Manager
P.O. Box 719
Santa Ynez, CA 93460

Subject: Groundwater Rate Study Report – REVISED DRAFT FINAL

Dear Mr. Walsh:

Raftelis is pleased to provide this Groundwater Rate Study report for the Santa Ynez River Water Conservation District (District). This report includes a financial plan for fiscal year 2023-2024 (FY 2024) through FY 2028. From those plans and a cost-of-service analysis, groundwater rates for FY 2024 have been developed.

The major objectives of the study include the following:

- Develop a financial plan to support financial sufficiency and meet operation and maintenance (O&M) costs;
- Conduct a water cost-of-service study that is based on the District's costs;
- Calculate proposed, updated water rates for FY 2024;
- Conduct an analysis of the effects of the proposed rates on District groundwater producers; and
- Demonstrate that the amount raised by the proposed groundwater rates are necessary to cover the reasonable costs of the District's activities, and that proposed rates are allocated to District producers in a manner that bears a fair or reasonable relationship to the benefits received from the District's activities, consistent with Proposition 26 (Cal. Const., Art. 13C, § 1).

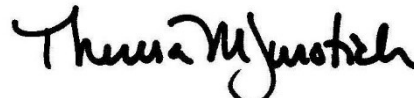
The report summarizes the key findings and recommendations related to the development of the financial plan and the development of the associated water rates.

It has been a pleasure working with you, and we appreciate your and Ms. Amber Thompson's assistance during the course of the study.

Sincerely,



Sudhir Pardiwala, PE
Executive Vice President



Theresa Jurotich, PE
Manager

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Abbreviations & Acronyms

Terms	Descriptions
AF	Acre foot / Acre feet, 1 AF = 325,851 gallons
DWR	California Department of Water Resources
FY	Fiscal Year (July 1st to June 30th)
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
O&M	Operations and Maintenance
Raftelis	Raftelis Financial Consultants, Inc.
SGMA	Sustainable Groundwater Management Act
SWRCB	State Water Resources Control Board

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1. Executive Summary

The Santa Ynez River Water Conservation District (“District”) was formed in 1939 for the primary purpose of protecting water rights on the lower Santa Ynez River and augmenting water supplies in the District, which are necessary for the public health, welfare, and safety of all residents. The District is a California Water Conservation District formed and existing pursuant to the Water Conservation District Law of 1931 (Wat. Code, §§ 74000 *et seq.*). Pursuant to Water Code sections 74508 and 75500, *et seq.*, the District is expressly authorized to impose groundwater charges within its boundaries, which the Legislature has declared to be in furtherance of district activities in the protection and augmentation of the water supplies for users within the District or a zone or zones thereof. (Wat. Code, § 75521.) The District has, at least since 1979, levied groundwater charges on all public and private operators of groundwater-producing facilities registered within the District to help recover the costs of managing, protecting, conserving, and enhancing water resources within the District. The District’s activities performed by its staff, consultants, and legal counsel include activities relating to the following:

- Planning, scheduling, and managing the release of water from and downstream of the Cachuma Project’s Bradbury Dam for the satisfaction and benefit of downstream water rights, including the timing, volume, and rate of flows to promote recharge in the river alluvium and the Lompoc Plain, as provided in State Water Resources Control Board Order No. WRO 2019-0148, which protects and augments water supplies.
- Reporting on Santa Ynez River system conditions, basin surface water use, and water purchased by contract.
- Supporting compliance with agreements and procedures to mitigate downstream flooding as a result of Cachuma Project storm operations.
- Contributing to the review of, preparation of, and compliance with applicable biological assessments and opinions, including associated consultations, revisions, and replacements, for the protection of endangered species in the Santa Ynez River, while assuring that downstream water rights and water quality in the basin and downstream of Bradbury Dam are maintained and protected.
- Recording groundwater production within the District.
- Monitoring and reporting on groundwater conditions within the District.
- Levying and collecting charges on groundwater production within the District.
- Making annual groundwater use estimates and forecasting groundwater storage and overdraft amounts within the District.
- Determining water volume for replenishment of the dewatered aquifer storage below Bradbury Dam.
- Participation in the three Groundwater Sustainability Agencies (GSA) covering the Santa Ynez River Valley groundwater basin and District. Such participation includes, but is not limited to, coordination, preparation, and implementation activities and provision of administrative support (including arranging GSA committee and citizen advisory group meetings, recordkeeping, and bookkeeping) associated with the GSAs’ groundwater sustainability plans (GSP), annual reports, and associated implementation and other activities. This includes coordinating and contributing to responses to comments made on the GSPs and related technical studies. It also includes participation in discussions of long-term governance and funding for the GSAs.
- The District’s administrative support of the GSAs, which requires expenditure of significant District staff time, has been necessary, in part, because the GSAs have not yet hired their own staff or their own legal, engineering, or other consultants, and have yet to levy any groundwater fees or charges on

landowners or pumpers within the GSAs or otherwise create an independent funding source (aside from grant funding and certain contributions from parties to the Memoranda of Agreement). While it is expected that the District will continue to incur costs to participate in the three GSAs and as the single point of contact with the California Department of Water Resources (DWR), the level of District administrative support could change in the future depending on the GSAs' future governance structure, funding sources, and staffing and contracting decisions.

- The District's activities as party to all three GSAs benefits all pumpers within the District, which depend upon the District to provide local agency Sustainable Groundwater Management Act (SGMA) coverage within its approximately 180,000 acres within the basin. In the absence of such SGMA coverage by the District, the entire basin may not be covered and in such event would be subject to State Water Resources Control Board intervention and management of the basin as a probationary basin (Wat. Code, § 10735.2(a)(4)(B)). The District's SGMA activities benefit, among other pumpers in the District, the pumpers in Zone A, who pump from the river alluvium and benefit from the District's investigation and efforts supporting characterization of those zones as not "groundwater" subject to SGMA management¹ in the GSPs, and the District's ongoing efforts to defend that characterization against those who disagree with it and contend such pumping must be managed under SGMA. To date, DWR has not decided on the adequacy of the GSPs, and the GSAs lack their own independent funding sources (e.g., fees under Water Code sections 10730 and 10730.2).
- Acting as the single point of contact between the GSAs and the DWR for SGMA compliance, for the benefit of all three GSAs.
- Administering SGMA grant funding for the benefit of all three GSAs.
- Participating in the Integrated Regional Water Management Plan process to promote regional water management strategies to ensure sustainable and reliable water supplies, including the protection of agriculture.

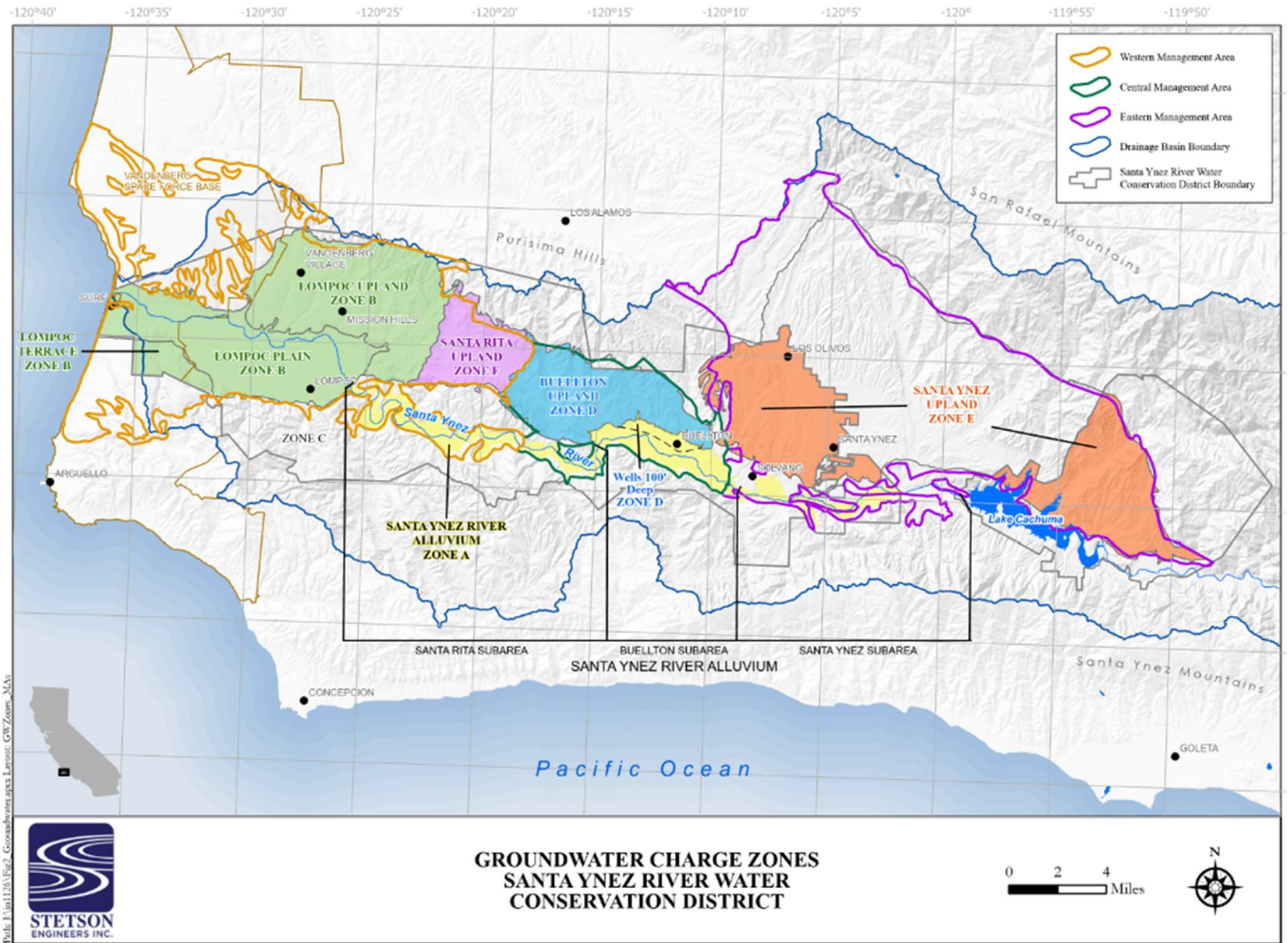
The District comprises two non-contiguous areas and encompasses approximately 180,000 acres that includes the cities of Lompoc, Solvang, and Buellton; the communities of Santa Ynez and Los Olivos; two federal installations; and rural areas with agriculture and suburban development. Groundwater mostly occurs in the unconsolidated alluvial deposits of the Santa Ynez River and Lompoc Plain and in the older poorly consolidated deposits of the Santa Ynez Upland, Lompoc Upland, Buellton Upland, Santa Rita Upland, and Lompoc Terrace subareas. These subareas are defined as zones as follows:

- Zone A – District portion of the Santa Ynez River alluvial channel from San Lucas Bridge downstream to Lompoc Narrows
- Zone B – District portion of the Lompoc Plain, Lompoc Upland, and Lompoc Terrace groundwater subareas
- Zone C – All other portions of the District not included in Zones A, B, D, E, and F
- Zone D – District portion of the Buellton Upland subarea
- Zone E – District portion of the Santa Ynez Upland subarea
- Zone F – District portion of the Santa Rita Upland subarea

The zones are shown in Figure 1-1, on the following page.

¹ SGMA defines the term "groundwater" differently than the Water Conservation District Act. (Compare Water Code, § 10721(g) [SGMA] with § 75502 [Water Conservation District Act].)

Figure 1-1: Groundwater Zones



The major objectives of this study include the following:

- Develop a financial plan to support financial sufficiency and meet operation and maintenance (O&M) costs;
- Conduct a water cost-of-service study that is based on the District’s costs;
- Calculate proposed, updated water rates for FY 2024;
- Conduct an analysis of the effects of the proposed rates on District groundwater producers; and
- Demonstrate that the amount raised by the proposed groundwater rates are necessary to cover the reasonable costs of the District’s activities, and that proposed rates are allocated to District producers in a manner that bears a fair or reasonable relationship to the payor’s burdens on, or benefits received, from the District’s activities, consistent with Proposition 26 (Cal. Const., Art. 13C, § 1).

This report summarizes the rate study’s 5-year financial plan and FY 2024 rate development. The District intends to update this 5-year plan every year with a new 5-year projection so that the Board can maintain a 5-year outlook. However, the District’s rates are set on an annual basis under Water Code sections 75500-75642.

1.1. Methodology

Raftelis and the District developed the proposed groundwater rates using cost-of-service principles set forth by the American Water Works Association M1 Manual titled *Principles of Water Rates, Fees and Charges*, with modifications to align with the requirements of California’s Proposition 26 and related California law.

Raftelis worked with District staff to develop a financial plan by preparing detailed projections of the main revenue sources and expenditure items. The operating revenues and O&M costs estimates are based on projected groundwater pumping from the findings of Stetson Engineers’ *Forty-Fifth Annual Engineering and Survey Report on Water Supply Conditions of the Santa Ynez River Water Conservation District FINAL* dated April 28, 2023, current rates, and District staff estimates of non-operating revenues and costs. The financial plan projection has revealed the need for revenue adjustments in FY 2024 – FY 2028 to meet annual obligations and build reserves to the recommended levels.

Raftelis calculated the District’s revenue requirements for FY 2024 and the resulting water rate and structure.

1.2. Proposed Financial Plan and Revenue Adjustments

The financial planning model enables the District to set rates to generate sufficient revenue to meet its short-term obligations. Table 1-1 shows the proposed groundwater revenue adjustments for FY 2024 - FY 2028. Revenue adjustments occur on July 1 each year.

Table 1-1: Proposed Revenue Adjustments

Fiscal Year	Proposed Revenue Adjustment
2024	10.5%
2025	10.5%
2026	10.5%
2027	10.5%
2028	10.5%

Table 1-2 shows the proposed financial plan, based on the District’s budgeted expenses, incorporating the proposed revenue adjustments (Lines 2 - 6). Note that while rates go into effect at the beginning of the fiscal year, due to semi-annual billing and timing of payments, revenues under the adjustments are only realized for half of the fiscal year in the first year. Therefore, the Number of Months Effective, ‘No. Mon. “Effective”’ column shows 6 months instead of 12. Line 1 shows revenue from the current rates, assuming no increase in rates. Line 7 shows the revenue adjustments each year. Other Revenues are shown in Lines 8 and 9. Line 8 shows projected property tax revenue after covering SGMA-related costs and certain other general costs. Interest revenues (Line 9) are presumed to be between 2 and 3 percent on average beginning and ending fund balances for the remaining fiscal years. Line 11 shows total projected revenues.

Table 1-2: Proposed Financial Plan Cashflow

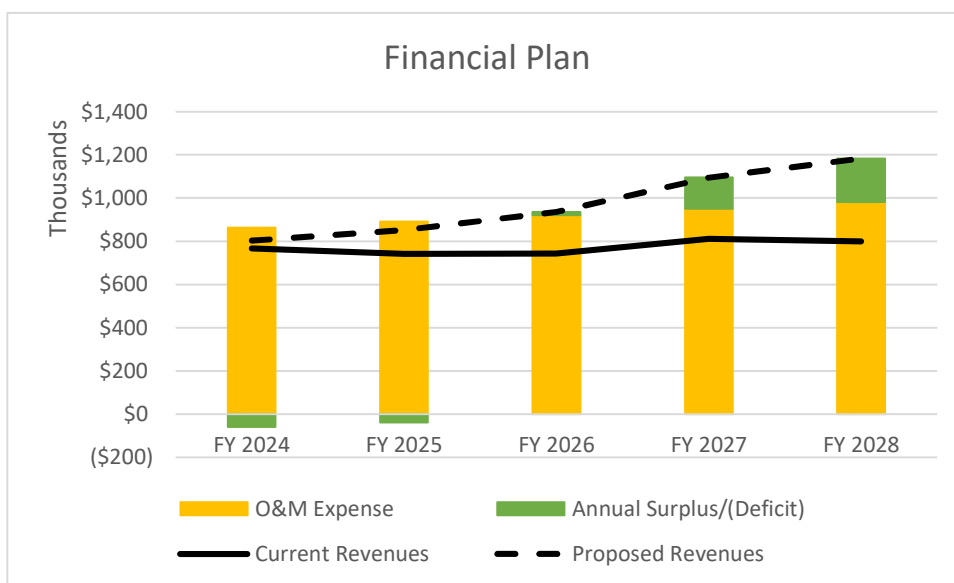
No.	Cashflow			FY 2024	FY 2025	FY 2026	FY 2027	FY 2028
1	Groundwater Rate Revenue Under Existing Rates			\$672,074	\$672,074	\$672,074	\$672,074	\$672,074
	Revenue Adjustments	% Adj.	No. Mon. "Effective"					
2	FY 2024	10.5%	6	\$35,284	\$70,568	\$70,568	\$70,568	\$70,568
3	FY 2025	10.5%	6		\$38,989	\$77,977	\$77,977	\$77,977
4	FY 2026	10.5%	6			\$43,083	\$86,165	\$86,165
5	FY 2027	10.5%	6				\$47,606	\$95,212
6	FY 2028	10.5%	6					\$52,605
7	Total Revenue Adjustments			\$35,284	\$109,556	\$191,628	\$282,316	\$382,527
	Other Revenue							
8	Net SB County Property Taxes			\$34,357	\$10,465	\$13,138	\$79,314	\$62,934
9	Interest Income			\$60,588	\$59,242	\$58,919	\$61,076	\$65,739
10	Total Other Revenue			\$94,944	\$69,707	\$72,056	\$140,390	\$128,673
11	Total Revenue			\$802,303	\$851,337	\$935,758	\$1,094,781	\$1,183,275
	Operation & Maintenance							
12	Routine Operation (Net Property Tax Offset)			\$613,007	\$635,357	\$658,536	\$682,575	\$707,507
13	Special Studies (Net of Offset)			\$0	\$0	\$0	\$0	\$0
14	SGMA (Net of Offset)			\$0	\$0	\$0	\$0	\$0
15	Legal & Engineering							
16	General and Misc. (Net of Offset)			\$0	\$0	\$0	\$0	\$0
17	Annual G.W. Report			\$22,000	\$22,660	\$23,340	\$24,040	\$24,761
18	WR Decision (2019-0148)			\$110,000	\$113,300	\$116,699	\$120,200	\$123,806
19	Upper SYR Operations			\$7,500	\$7,725	\$7,957	\$8,195	\$8,441
20	Fisheries Issues/Hydrology			\$60,000	\$61,800	\$63,654	\$65,564	\$67,531
21	Contingency			\$50,000	\$50,000	\$50,000	\$50,000	\$50,000
22	Total Operation & Maintenance			\$862,507	\$890,842	\$920,186	\$950,574	\$982,046
23	Capital			\$0	\$0	\$0	\$0	\$0
24	Net Income (Annual Surplus/(Deficit))			(\$60,204)	(\$39,504)	\$15,573	\$144,206	\$201,228
25	Beginning Balance			\$2,274,098	\$2,213,894	\$2,174,390	\$2,189,962	\$2,334,169
26	Ending Balance			\$2,213,894	\$2,174,390	\$2,189,962	\$2,334,169	\$2,535,397
27	Target Reserve = Min + 50% Operating Exp.			\$2,431,253	\$2,445,421	\$2,460,093	\$2,475,287	\$2,491,023
28	Minimum Reserve			\$2,000,000	\$2,000,000	\$2,000,000	\$2,000,000	\$2,000,000

Lines 12 – 22 summarize the O&M expense projections, excluding SGMA costs that are funded by grants and property taxes, and also excluding special studies and general and miscellaneous legal and engineering costs that are also offset by property taxes. Line 23 shows that no capital expenditures are anticipated. Line 24 shows the net income, which is revenues less O&M expenses. Lines 25 and 26 show the projected beginning and ending Investment Reserves fund balance, respectively. Line 27 shows the target reserve, which is the minimum reserve of \$2 million plus 50 percent of annual operating expenses. The minimum reserve is established by Board policy to cover emergencies and unexpected events including potential litigation. The remainder of the reserve is recommended by Raftelis to provide working capital for the District’s expenses, given the required semiannual billing. Revenue adjustments proposed in this financial plan are calculated to meet this reserve target by the end of FY 2028. Comparing Line 26 to Line 27 and Line 28 shows that the

financial plan is expected to always exceed the minimum reserve requirement and will meet its target reserve by FY 2028. The proposed financial plan supports financial sufficiency and solvency for the District to meet projected expenditures.

Figure 1-2 graphically illustrates the proposed operating Financial Plan – it compares the existing (current) and proposed revenues with projected expenses. The stacked bars show O&M expenses. The green bars above the X-axis show the net cash used to build up the reserves and the bars below the X-axis show the withdrawals from reserves to fund costs. Total revenues at existing and proposed rates are shown by horizontal black solid and dashed lines, respectively. Current revenue from existing rates does not meet future total expenses, which is the reason for the proposed revenue adjustment.

Figure 1-2: Proposed Financial Plan



1.3. Proposed FY 2024 Rates

1.3.1. Proposed Usage Rates

Table 1-3 presents the current water rate and the proposed FY 2024 water rate. The proposed rate is rounded up to the nearest cent to ensure adequate costs recovery.

Table 1-3: Current and Proposed Usage Rates, \$/AF

Rate	Zone A	Zone B	Zone C	Zone D	Zone E	Zone F
Current	\$14.14	\$14.14	\$14.14	\$14.14	\$14.14	\$14.14
Proposed, FY 2024	\$20.42	\$14.24	\$12.41	\$12.41	\$12.41	\$12.41

1.3.2. Average Producer Bill Impact

The average usage varies by zone, and therefore Table 1-4 through Table 1-6 illustrates the customer bill impact for an average agricultural producer, an average special irrigation producer, and an average Other (non-agricultural) producer within each zone. Average use per bill is based on FY 2022 data from Stetson

Engineers’ *Forty-Fifth Annual Engineering and Survey Report on Water Supply Conditions of the Santa Ynez River Water Conservation District FINAL* dated April 28, 2023.

Table 1-4: Average Agricultural Producer by Zone, FY 2024 Bill Impact

Agricultural	Zone A	Zone B	Zone C	Zone D	Zone E	Zone F
Average AF/bill	30.5	36.8	0.2	8.3	5.8	35.0
Current Bill	\$430.91	\$520.84	\$2.75	\$117.59	\$82.22	\$494.76
Proposed Bill	\$622.29	\$524.53	\$2.41	\$103.20	\$72.16	\$434.23
Bill Change, \$	\$191.38	\$3.68	-\$0.34	-\$14.39	-\$10.06	-\$60.53
% Change	44%	1%	-12%	-12%	-12%	-12%

Table 1-5: Average Special Irrigation Producer by Zone, FY 2024 Bill Impact

Special Irrigation	Zone A	Zone B	Zone C	Zone D	Zone E	Zone F
Average AF/bill	3.3	3.5	0.1	0.2	0.0	0.0
Current Bill	\$46.04	\$49.17	\$1.83	\$2.70	\$0.69	\$0.00
Proposed Bill	\$66.49	\$49.52	\$1.60	\$2.37	\$0.60	\$0.00
Bill Change, \$	\$20.45	\$0.35	-\$0.22	-\$0.33	-\$0.08	\$0.00
% Change	44%	1%	-12%	-12%	-12%	--

Table 1-6: Average Other (Non-Agricultural) Producer by Zone, FY 2024 Bill Impact

Non-Agricultural	Zone A	Zone B	Zone C	Zone D	Zone E	Zone F
Average AF/bill	8.7	16.3	7.5	2.7	4.4	3.0
Current Bill	\$123.17	\$230.34	\$105.61	\$38.40	\$62.70	\$42.39
Proposed Bill	\$177.87	\$231.97	\$92.69	\$33.70	\$55.03	\$37.20
Bill Change, \$	\$54.70	\$1.63	-\$12.92	-\$4.70	-\$7.67	-\$5.19
% Change	44%	1%	-12%	-12%	-12%	-12%

2. Legal Framework

Proposition 26, codified in the California Constitution as Article XIII C, was approved by voters in 2010 to require a supermajority vote to pass new taxes. Furthermore, Proposition 26 expanded the definition of “tax.” Under the new definition, a tax is any levy, charge, or exaction of any kind imposed by a local government. Any fees or charges that are not exempted by the language of Proposition 26 are considered taxes and subject to voter approval.

Under Proposition 26, local water agencies must demonstrate their fees and charges are not taxes by showing that they fall within one of the exceptions in Proposition 26, which include, among others, the following:

"(e) As used in this article, “tax” means any levy, charge, or exaction of any kind imposed by a local government, except the following:

(1) A charge imposed for a specific benefit conferred or privilege granted directly to the payor that is not provided to those not charged, and which does not exceed the reasonable costs to the government of conferring the benefit or granting the privilege.

(2) A charge imposed for a specific government service or product provided directly to the payor that is not provided to those not charged, and which does not exceed the reasonable costs to the local government of providing the service or product.”

In order not to be considered a tax, Prop 26 requires that local water purveyors must demonstrate that “that the amount is no more than necessary to cover the reasonable costs of the governmental activity, and that the manner in which those costs are allocated to a payor bear a fair or reasonable relationship to the payor’s burdens on, or benefits received from, the governmental activity.”

3. Financial Plan

Determining a district’s revenue requirement is a key first step in the rate study process. Raftelis analyzed annual operating revenue under the status quo, operation and maintenance (O&M) expenses, and prudent reserve funding practices. This section of the report provides a discussion of the projected revenues, O&M expenses, reserve funding requirements, and the revenue adjustments needed to support fiscal sustainability and solvency.

3.1. Key Information Used in this Report

This report utilized the following key information provided by the District:

- FY 2023 operating budget and FY 2024 preliminary draft operating budget
- Historical and forecast water pumping amounts
- Historical water rates
- Beginning reserve fund balances as of FY 2023
- Forecast SGMA costs and grant reimbursements FY 2024 - FY 2028. These cost projections assume that none of the GSA’s will have generated any independent income in FY 2024. These projections are not an expression of policy or opinions, but they reflect the status quo, which is that none of the three GSAs have implemented any revenue sources of their own.

3.2. Revenue from Current Water Rates

3.2.1. Current Water Rates

The current water rates are on a volumetric basis per acre-foot (AF) and are currently \$14.14/AF.

3.2.2. Water Use and Growth Assumptions

Table 3-1 shows the financial plan assumptions for water use each year for FY 2024 – FY 2028, which is forecast to stay the same over the study period. The projected water use comes from Stetson Engineers’ *Forty-Fifth Annual Engineering and Survey Report on Water Supply Conditions of the Santa Ynez River Water Conservation District FINAL* dated April 28, 2023.

Table 3-1: Projected Water Use Per Year

Producer Class	Water Use, AF
Agriculture	31,680
Special Irrigation	13,280
Other	2,570
Total	47,530

3.2.3. Revenue Projections

Table 3-2 presents the projection of the rate-based revenue for FY 2024 – FY 2028 under the current rates.

Table 3-2: Projected Rate Revenue Under Existing Rates

Producer Class	Rate, \$/AF	Water Use, AF	FY 2024	FY 2025	FY 2026	FY 2027	FY 2028
Agriculture	\$14.14	31,680	\$447,955	\$447,955	\$447,955	\$447,955	\$447,955
Special Irrigation	\$14.14	13,280	\$187,779	\$187,779	\$187,779	\$187,779	\$187,779
Other	\$14.14	2,570	\$36,340	\$36,340	\$36,340	\$36,340	\$36,340
Total		47,530	\$672,074	\$672,074	672,074	672,074	672,074

Table 3-3 shows the projection of other revenues, which includes property taxes (net of SGMA costs and reimbursements and other costs as discussed further in the next section) and estimated interest income. Property taxes are estimated to increase at 2 percent per year from the FY 2024 budget. Interest income is estimated at 2.7 percent of the average beginning and ending balances.

Table 3-3: Projected Other Revenue

Line Item	FY 2024	FY 2025	FY 2026	FY 2027	FY 2028
SB County Property Taxes - Net	\$34,357	\$10,465	\$13,138	\$79,314	\$62,934
Interest Income	\$60,588	\$59,242	\$58,919	\$61,076	\$65,739
Total	\$94,944	\$69,707	\$72,056	\$140,390	\$128,673

3.3. Operating and Maintenance Expenses

3.3.1. Water Operating Expense

Table 3-4 shows the budgeted (FY 2024) and projected operating and maintenance expenses, which includes routine operations, legal, engineering, and contingency. Salaries and benefits are each escalated at 4 percent per year from budget. General costs are escalated at 3 percent per year from budget. The detailed O&M is included in Appendix A.

Table 3-4: Projected O&M Expenses

Line Item	FY 2024	FY 2025	FY 2026	FY 2027	FY 2028
Routine Operation	\$797,800	\$827,542	\$858,409	\$890,443	\$923,689
Special Studies	\$36,000	\$37,080	\$38,192	\$39,338	\$40,518
SGMA	\$113,000	\$144,000	\$139,000	\$40,000	\$40,000
Legal & Engineering					
General and Misc.	\$31,500	\$32,445	\$33,418	\$34,421	\$35,454
Annual G.W. Report	\$22,000	\$22,660	\$23,340	\$24,040	\$24,761
WR Decision (2019-0148)	\$110,000	\$113,300	\$116,699	\$120,200	\$123,806
Upper SYR Operations	\$7,500	\$7,725	\$7,957	\$8,195	\$8,441
Fisheries Issues/Hydrology	\$60,000	\$61,800	\$63,654	\$65,564	\$67,531
Contingency	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000
Total Operation & Maintenance	\$1,227,800	\$1,296,552	\$1,330,669	\$1,272,201	\$1,314,200

3.3.2. Net Operating Expense

The District plans to first use property tax revenues and SGMA grant administration cost reimbursement to cover SGMA-related costs and a portion of other general costs, as shown in Table 3-5. Any remaining

property tax revenue will be used to offset the District’s remaining operating costs. The total shown below matches the first line of Table 3-3.

Table 3-5: Property Tax Revenue Use

Line Item	FY 2024	FY 2025	FY 2026	FY 2027	FY 2028
Property Tax Revenue	\$365,000	\$372,300	\$379,746	\$387,341	\$395,088
SGMA Grant Admin Cost Reimbursement	\$34,650	\$43,875	\$43,875	\$13,600	\$0
Salary & Benefits for SGMA-time	(\$184,793)	(\$192,185)	(\$199,873)	(\$207,867)	(\$216,182)
SGMA	(\$113,000)	(\$144,000)	(\$139,000)	(\$40,000)	(\$40,000)
General & Misc.	(\$31,500)	(\$32,445)	(\$33,418)	(\$34,421)	(\$35,454)
Special Studies	(\$36,000)	(\$37,080)	(\$38,192)	(\$39,338)	(\$40,518)
Remaining Property Tax Revenue	\$34,357	\$10,465	\$13,138	\$79,314	\$62,934

Table 3-6 shows the net O&M expense projection after offsetting the costs shown in Table 3-5.

Table 3-6: Net O&M Expense Projection

Line Item	FY 2024	FY 2025	FY 2026	FY 2027	FY 2028
Routine Operation (Net Property Tax Offset)	\$613,007	\$635,357	\$658,536	\$682,575	\$707,507
Legal & Engineering					
Annual G.W. Report	\$22,000	\$22,660	\$23,340	\$24,040	\$24,761
WR Decision (2019-0148)	\$110,000	\$113,300	\$116,699	\$120,200	\$123,806
Upper SYR Operations	\$7,500	\$7,725	\$7,957	\$8,195	\$8,441
Fisheries Issues/Hydrology	\$60,000	\$61,800	\$63,654	\$65,564	\$67,531
Contingency	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000
Net Operation & Maintenance	\$862,507	\$890,842	\$920,186	\$950,574	\$982,046

3.4. Proposed Financial Plan and Revenue Adjustments

The proposed financial plan enables the District to set groundwater rates to generate sufficient revenues to meet its annual obligations. The plan shows the revenues that will be used to maintain appropriate reserves while maintaining a sensitivity to rate increases.

Table 3-7, on the following page, shows the proposed financial plan, based on the District’s budgeted expenses, incorporating the proposed revenue adjustments (Lines 2 - 6). Note that while rates go into effect at the beginning of the fiscal year, due to semi-annual billing and timing of payments, revenues under the adjustments are only realized for half of the fiscal year in the first year. Therefore, the Number of Months Effective, ‘No. Mon. “Effective”’ column shows 6 months instead of 12. Line 1 shows revenue from the current rates, assuming no increase in rates. Line 7 shows the revenue adjustments each year. Other Revenues are shown in Lines 8 and 9. Line 8 shows projected property tax revenue after covering SGMA-related costs and certain other general costs. Interest revenues (Line 9) are presumed to be 2.7 percent on average beginning and ending fund balances for the remaining fiscal years. Line 11 shows total projected revenues.

Lines 12 – 22 summarize the O&M expense projections, net the use of property taxes and SGMA reimbursed costs to cover SGMA-related costs, general and miscellaneous legal and engineering costs, and special studies costs. Line 23 shows that no capital expenditures are anticipated. Line 24 shows the net income, which is

revenues less O&M expenses. Lines 25 and 26 show the projected beginning and ending Investment Reserves fund balance, respectively. Line 27 shows the target reserve, which is the minimum reserve of \$2 million plus 50 percent of annual operating expenses. The minimum reserve is established by Board policy to cover emergencies and unexpected events. The remainder of the reserve is recommended by Raftelis to provide working capital for the District’s expenses, given the required semiannual billing. Revenue adjustments aim to meet this target by the end of FY 2028. Comparing Line 26 with Line 27 and Line 28 shows that the financial plan is expected to always exceed the minimum reserve requirement and will meet its target reserve by FY 2028. The proposed financial plan supports financial sufficiency and solvency for the District to meet projected expenditures.

Table 3-7: Proposed Financial Plan Cashflow

No.	Cashflow			FY 2024	FY 2025	FY 2026	FY 2027	FY 2028
1	Groundwater Rate Revenue Under Existing Rates			\$672,074	\$672,074	\$672,074	\$672,074	\$672,074
	Revenue Adjustments	% Adj.	No. Mon. "Effective"					
2	FY 2024	10.5%	6	\$35,284	\$70,568	\$70,568	\$70,568	\$70,568
3	FY 2025	10.5%	6		\$38,989	\$77,977	\$77,977	\$77,977
4	FY 2026	10.5%	6			\$43,083	\$86,165	\$86,165
5	FY 2027	10.5%	6				\$47,606	\$95,212
6	FY 2028	10.5%	6					\$52,605
7	Total Revenue Adjustments			\$35,284	\$109,556	\$191,628	\$282,316	\$382,527
	Other Revenue							
8	Net SB County Property Taxes			\$34,357	\$10,465	\$13,138	\$79,314	\$62,934
9	Interest Income			\$60,000	\$60,000	\$60,000	\$60,000	\$60,000
10	Total Other Revenue			\$94,357	\$70,465	\$73,138	\$139,314	\$122,934
11	Total Revenue			\$801,715	\$852,096	\$936,840	\$1,093,705	\$1,177,535
	Operation & Maintenance							
12	Routine Operation (Net Property Tax Offset)			\$613,007	\$635,357	\$658,536	\$682,575	\$707,507
13	Special Studies (Net of Offset)			\$0	\$0	\$0	\$0	\$0
14	SGMA (Net of Offset)			\$0	\$0	\$0	\$0	\$0
15	Legal & Engineering							
16	General and Misc. (Net of Offset)			\$0	\$0	\$0	\$0	\$0
17	Annual G.W. Report			\$22,000	\$22,660	\$23,340	\$24,040	\$24,761
18	WR Decision (2019-0148)			\$110,000	\$113,300	\$116,699	\$120,200	\$123,806
19	Upper SYR Operations			\$7,500	\$7,725	\$7,957	\$8,195	\$8,441
20	Fisheries Issues/Hydrology			\$60,000	\$61,800	\$63,654	\$65,564	\$67,531
21	Contingency			\$50,000	\$50,000	\$50,000	\$50,000	\$50,000
22	Total Operation & Maintenance			\$862,507	\$890,842	\$920,186	\$950,574	\$982,046
23	Capital			\$0	\$0	\$0	\$0	\$0
24	Net Income (Annual Surplus/(Deficit))			(\$60,792)	(\$38,746)	\$16,654	\$143,131	\$195,489
25	Beginning Balance			\$2,274,098	\$2,213,306	\$2,174,560	\$2,191,214	\$2,334,345
26	Ending Balance			\$2,213,306	\$2,174,560	\$2,191,214	\$2,334,345	\$2,529,834
27	Target Reserve = Min + 50% Operating Exp.			\$2,431,253	\$2,445,421	\$2,460,093	\$2,475,287	\$2,491,023
28	Minimum Reserve			\$2,000,000	\$2,000,000	\$2,000,000	\$2,000,000	\$2,000,000

Figure 3-1 graphically illustrates the proposed operating Financial Plan – it compares the existing (current) and proposed revenues with projected expenses. The stacked bars show O&M expenses. The green bars above the X-axis show the net cash used to build up the reserves and the bars below the X-axis show the withdrawals from reserves to fund costs. Total revenues at existing and proposed rates are shown by horizontal black solid and dashed lines, respectively. Current revenue from existing rates does not meet future total expenses, which is the reason for the proposed revenue adjustment.

Figure 3-1: Proposed Financial Plan

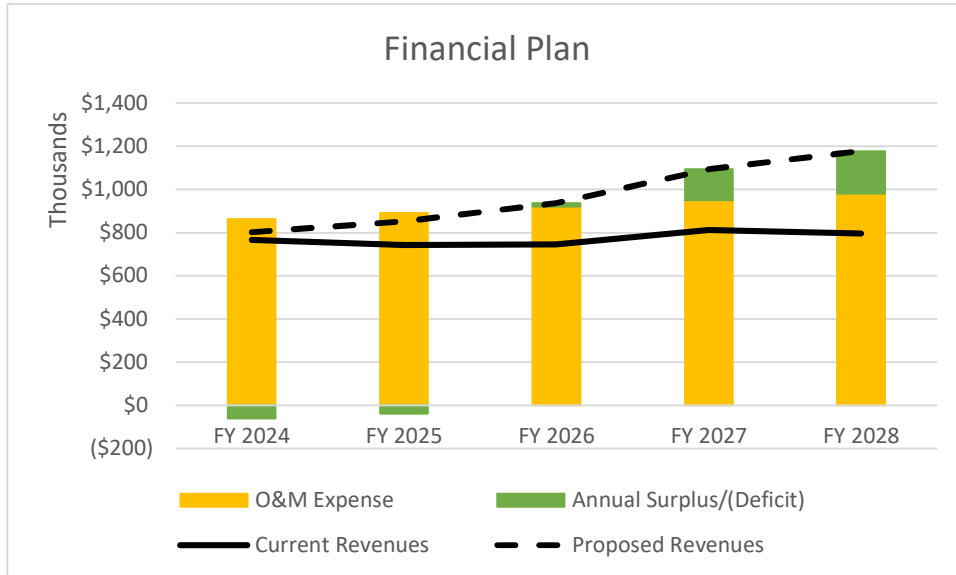
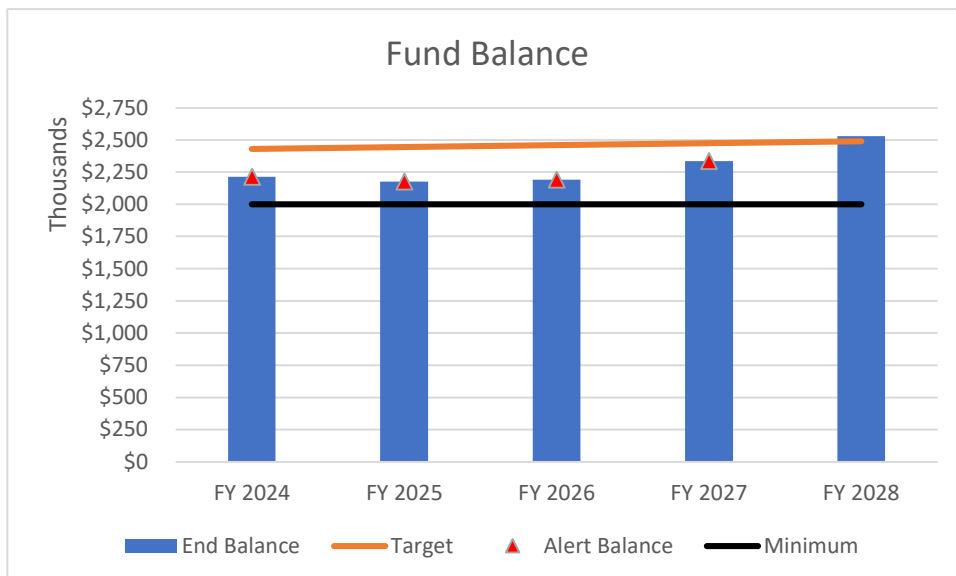


Figure 3-2 shows the projected investments fund balance.

Figure 3-2: Projected Investments Fund Balance



4. Proposed Water Rates

4.1. Net Revenue Requirements

The costs to be allocated to the producers consist of the total revenue requirement less income received from other sources (net revenue requirements). Table 4-1 shows the development of the costs that must be recovered through the rate for FY 2024. Raftelis calculated the revenue requirement using the FY 2024 projections of O&M and capital expenses (which are \$0), shown in Lines 1 and 2. Lines 4 – 6 show the other operating revenues, which are used to offset some of the revenue requirement. The adjustments in Line 9 ensure the cost-of-service accounts for the annual cash balances. Line 10 shows the total revenue required from rates, calculated by adding Lines 3, 7, and 10.

Table 4-1: Net Revenue Requirements, FY 2024

Net Revenue Requirement, Test Year				
No.	Line Item	Operating	Capital	Total
	Revenue Requirement			
1	Operations	\$862,507		\$862,507
2	Capital		\$0	\$0
3	Total Revenue Requirement	\$862,507	\$0	\$862,507
	Revenue Offsets			\$0
4	Net SB County Property Taxes	(\$34,357)		(\$34,357)
5	Interest Income	(\$60,000)		(\$60,000)
6	Subtotal Revenue Offsets	(\$94,357)		(\$94,357)
	Other Adjustments			
7	Change in Fund Balance	(\$60,792)		(\$60,792)
8	Annualized Rate Adjustment	\$35,284		\$35,284
9	Total Adjustments	(\$25,508)	\$0	(\$25,508)
10	Net Revenue Requirement	\$742,642	\$0	\$742,642

4.2. Rate Structure Analysis

Since FY 2018, the District has utilized a uniform groundwater charge rate among the management zones in the District (Zones A through F). Comments received on the previous draft rate study suggested, among other things, that only Zones A and B should be charged for the costs of certain District activities including those relating to water rights releases. The District disagrees with, among other things, the comments’ suggestion that water rights releases solely benefit Zones A and B. There are at least incidental benefits to other zones, and the District believes it has considerable discretion consistent with Proposition 26 to reasonably allocate those costs amongst the different zones. However, for FY 2024, without setting any precedent, the District has decided to charge only Zones A and B for all work related to water rights releases, including the work on fisheries issues and work involved with all upstream reservoirs on the Santa Ynez River: Cachuma, Gibraltar, and Jameson Reservoirs. All other work by the District will be shared proportionally among all the zones because all such work benefits all the zones.

The proportion of the charge for the work related to water rights releases between Zones A and B is based on the average annual delivery of water rights releases since the SWRCB Water Rights Order 89-18. From 1990-2022 (33 years), the average yearly water rights releases delivered to Zones A and B were 4,438 and 1,761 acre-feet per year, respectively. So, Zones A and B will be charged 72% and 28%, respectively, for all work by the District related to water rights releases. Stetson, the District’s long-standing consulting engineer, has recommended this methodology as a reasonable way to allocate the costs of such work among Zones A and B, and Raftelis believes such allocation bears a fair or reasonable relationship to the benefits received from the District’s activities relative to those zones, consistent with Proposition 26.

The purpose of the District is to manage groundwater and protect and augment the water supplies of the District, which are necessary for the public health, welfare, and safety of all users. Rate differentials for producer classes typically are based on the different peaking characteristics of producer classes. In this case, all producers have their own wells from which they draw water, and therefore the District does not incur costs to provide facilities to meet peaking demands. The District’s operations benefit all users in proportion to the amount of water they draw from their wells. Therefore, we have created zonal rates but have not set separate rates based on class of producer.

4.3. Calculating Rates

Once the revenue requirement is known, the costs need to be allocated to the zones. Table 4-2 shows how each of the O&M cost categories are allocated. For all activities except those related to water rights releases, the cost allocation is based on the projected usage in FY 2024 (Table 3-1) based on the findings and determinations in Stetson Engineers’ Forty-Fifth Annual Engineering and Survey Report on Water Supply Conditions of the Santa Ynez River Water Conservation District FINAL dated April 28, 2023. For activities related to water rights releases, the cost allocation is based on the average water rights deliveries from 1990-2022 (33 years) based on Table 6 in the Stetson report.

Table 4-2: Net O&M Cost Allocation

Line Item	Allocation Method	A	B	C	D	E	F
Routine Operation	% of Total Production	29%	49%	2%	5%	10%	5%
Legal & Engineering							
Annual G.W. Report	% of Total Production	29%	49%	2%	5%	10%	5%
WR Decision (2019-0148)	% of Water Rights Releases	72%	28%	0%	0%	0%	0%
Upper SYR Operations	% of Water Rights Releases	72%	28%	0%	0%	0%	0%
Fisheries Issues/Hydrology	% of Water Rights Releases	72%	28%	0%	0%	0%	0%
Contingency	% of Total Production	29%	49%	2%	5%	10%	5%

Table 4-3 applies the allocations shown in Table 4-2 to the FY 2024 Net O&M costs shown in Table 3-6.

Table 4-3: Net O&M Costs Allocated to Zones

Line Item	Total	Zone A	Zone B	Zone C	Zone D	Zone E	Zone F
Routine Operation	\$613,007	\$177,356	\$302,236	\$11,658	\$28,079	\$64,280	\$29,398
Legal & Engineering							
Annual G.W. Report	\$22,000	\$6,365	\$10,847	\$418	\$1,008	\$2,307	\$1,055
WR Decision (2019-0148)	\$110,000	\$79,200	\$30,800	\$0	\$0	\$0	\$0
Upper SYR Operations	\$7,500	\$5,400	\$2,100	\$0	\$0	\$0	\$0
Fisheries Issues/Hydrology	\$60,000	\$43,200	\$16,800	\$0	\$0	\$0	\$0
Contingency	\$50,000	\$14,466	\$24,652	\$951	\$2,290	\$5,243	\$2,398
Total	\$862,507	\$325,987	\$387,435	\$13,028	\$31,377	\$71,830	\$32,850

Table 4-4 shows the net revenue requirement allocated to the zones. The revenue offsets are allocated proportionally to each zone.

Table 4-4: Allocation of Net Revenue Requirement

Unit Cost of Service, Test Year	Total	Zone A	Zone B	Zone C	Zone D	Zone E	Zone F
Operations	\$862,507	\$325,987	\$387,435	\$13,028	\$31,377	\$71,830	\$32,850
Capital	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total	\$862,507	\$325,987	\$387,435	\$13,028	\$31,377	\$71,830	\$32,850
Revenue Offsets							
Net SB County Property Taxes	(\$34,357)	(\$12,985)	(\$15,433)	(\$519)	(\$1,250)	(\$2,861)	(\$1,309)
Interest Income	(\$60,588)	(\$22,899)	(\$27,216)	(\$915)	(\$2,204)	(\$5,046)	(\$2,308)
Other Adjustments	(\$24,920)	(\$9,419)	(\$11,194)	(\$376)	(\$907)	(\$2,075)	(\$949)
Net Revenue Requirement	\$742,642	\$280,684	\$333,592	\$11,217	\$27,016	\$61,847	\$28,285

Table 4-5 shows the unit cost-of-service based on dividing the net revenue requirement allocated to each zone (Table 4-4) by the projected usage in FY 2024 (Table 3-1) based on the findings and determinations in Stetson Engineers’ *Forty-Fifth Annual Engineering and Survey Report on Water Supply Conditions of the Santa Ynez River Water Conservation District FINAL* dated April 28, 2023.

Table 4-5: Unit Cost-of-Service, FY 2024

Unit Cost of Service, Test Year	Total	Zone A	Zone B	Zone C	Zone D	Zone E	Zone F
Net Revenue Requirement	\$742,642	\$280,684	\$333,592	\$11,217	\$27,016	\$61,847	\$28,285
Test Year AF	47,530	13,751	23,434	904	2,177	4,984	2,279
Unit Cost, \$/AF		\$20.42	\$14.24	\$12.41	\$12.41	\$12.41	\$12.41

4.4. Proposed Usage Rates (\$/AF)

Table 4-6 presents the current rate and the proposed rate for FY 2024. The proposed rates are rounded up to the nearest cent.

Table 4-6: Current and Proposed Usage Rates, \$/AF

Rate	Zone A	Zone B	Zone C	Zone D	Zone E	Zone F
Current	\$14.14	\$14.14	\$14.14	\$14.14	\$14.14	\$14.14
Proposed, FY 2024	\$20.42	\$14.24	\$12.41	\$12.41	\$12.41	\$12.41

4.5. Projected Revenues Under Cost-of-Service Rates

Table 4-7 shows the revenues under the current rates based on the FY 2024 projected usage and the revenues using the proposed rates. The percent increase in total revenues matches the proposed revenue adjustment shown in the financial plan (Table 3-7).

Table 4-7: Projected Revenues Under Cost-of-Service Rates, FY 2024

Zone	Estimated Usage AF	Current Rate \$/AF	Revenue Under Current Rates	Proposed Rate \$/AF	Revenue Under Proposed Rates	Percent Increase/Decrease
Zone A	13,750	\$14.14	\$194,425	\$20.42	\$280,775	44.4%
Zone B	23,435	\$14.14	\$331,371	\$14.24	\$333,714	0.7%
Zone C	905	\$14.14	\$12,797	\$12.41	\$11,231	-12.2%
Zone D	2,175	\$14.14	\$30,755	\$12.41	\$26,992	-12.2%
Zone E	4,985	\$14.14	\$70,488	\$12.41	\$61,864	-12.2%
Zone F	2,280	\$14.14	\$32,239	\$12.41	\$28,295	-12.2%
Total	47,530		\$672,074		\$742,871	10.5%

4.6. Producer Impact Analysis

Table 4-8 through Table 4-10 illustrate the producer bill impact for an average agricultural producer, an average special irrigation producer, and an average non-agricultural producer within each zone. Average use per bill is based on FY 2022 billing data from Stetson Engineers’ *Forty-Fifth Annual Engineering and Survey Report on Water Supply Conditions of the Santa Ynez River Water Conservation District FINAL* dated April 28, 2023.

Table 4-8: Average Agricultural Producer by Zone, FY 2024 Bill Impact

Agricultural	Zone A	Zone B	Zone C	Zone D	Zone E	Zone F
Average AF/bill	30.5	36.8	0.2	8.3	5.8	35.0
Current Bill	\$430.91	\$520.84	\$2.75	\$117.59	\$82.22	\$494.76
Proposed Bill	\$622.29	\$524.53	\$2.41	\$103.20	\$72.16	\$434.23
Bill Change, \$	\$191.38	\$3.68	-\$0.34	-\$14.39	-\$10.06	-\$60.53
% Change	44%	1%	-12%	-12%	-12%	-12%

Table 4-9: Average Special Irrigation Producer by Zone, FY 2024 Bill Impact

Special Irrigation	Zone A	Zone B	Zone C	Zone D	Zone E	Zone F
Average AF/bill	3.3	3.5	0.1	0.2	0.0	0.0
Current Bill	\$46.04	\$49.17	\$1.83	\$2.70	\$0.69	\$0.00
Proposed Bill	\$66.49	\$49.52	\$1.60	\$2.37	\$0.60	\$0.00
Bill Change, \$	\$20.45	\$0.35	-\$0.22	-\$0.33	-\$0.08	\$0.00
% Change	44%	1%	-12%	-12%	-12%	--

Table 4-10: Average Other (Non-Agricultural) Producer by Zone, FY 2024 Bill Impact

Non-Agricultural	Zone A	Zone B	Zone C	Zone D	Zone E	Zone F
Average AF/bill	8.7	16.3	7.5	2.7	4.4	3.0
Current Bill	\$123.17	\$230.34	\$105.61	\$38.40	\$62.70	\$42.39
Proposed Bill	\$177.87	\$231.97	\$92.69	\$33.70	\$55.03	\$37.20
Bill Change, \$	\$54.70	\$1.63	-\$12.92	-\$4.70	-\$7.67	-\$5.19
% Change	44%	1%	-12%	-12%	-12%	-12%

APPENDIX A:
O&M Detail



O&M Budget & Projection Detail		FY 2024	FY 2025	FY 2026	FY 2027	FY 2028
Internal Operations / Expenses						
Employee Salaries	Salaries	\$503,000	\$523,120	\$544,045	\$565,807	\$588,439
Payroll (SS and Medicare)	Benefits	\$32,000	\$33,280	\$34,611	\$35,996	\$37,435
Employee Benefits	Benefits	\$9,800	\$10,192	\$10,600	\$11,024	\$11,465
Retirement Plan Contributions	Benefits	\$36,000	\$37,440	\$38,938	\$40,495	\$42,115
Outside Services	General	\$8,000	\$8,240	\$8,487	\$8,742	\$9,004
Office Expense	General	\$67,000	\$69,010	\$71,080	\$73,213	\$75,409
Director Fees	General	\$6,000	\$6,180	\$6,365	\$6,556	\$6,753
Travel & Training	General	\$8,000	\$8,240	\$8,487	\$8,742	\$9,004
Annual Audit	General	\$20,000	\$20,600	\$21,218	\$21,855	\$22,510
Insurance & Worker's Comp	General	\$21,000	\$21,630	\$22,279	\$22,947	\$23,636
Dues and LAFCO Fees	General	\$7,000	\$7,210	\$7,426	\$7,649	\$7,879
Groundwater Charges Program	General	\$76,000	\$78,280	\$80,628	\$83,047	\$85,539
Miscellaneous	General	\$4,000	\$4,120	\$4,244	\$4,371	\$4,502
Legal						
General & Misc.	General	\$15,000	\$15,450	\$15,914	\$16,391	\$16,883
Downstream Releases / Upper SYR Operations	General	\$2,500	\$2,575	\$2,652	\$2,732	\$2,814
WR Decision (2019-0148)	General	\$25,000	\$25,750	\$26,523	\$27,318	\$28,138
Fisheries Issues	General	\$30,000	\$30,900	\$31,827	\$32,782	\$33,765
Employment/HR	General	\$2,500	\$2,575	\$2,652	\$2,732	\$2,814
Groundwater Program	General	\$5,000	\$5,150	\$5,305	\$5,464	\$5,628
Engineering/Environmental						
General & Misc.	General	\$9,000	\$9,270	\$9,548	\$9,835	\$10,130
Annual GW Report	General	\$22,000	\$22,660	\$23,340	\$24,040	\$24,761
Downstream Releases Operations	General	\$65,000	\$66,950	\$68,959	\$71,027	\$73,158
Upper SYR Operations	General	\$5,000	\$5,150	\$5,305	\$5,464	\$5,628
WR Decision (2019-0148)	General	\$20,000	\$20,600	\$21,218	\$21,855	\$22,510
Fisheries Hydrology	General	\$30,000	\$30,900	\$31,827	\$32,782	\$33,765
Other Consultants	General	\$36,000	\$37,080	\$38,192	\$39,338	\$40,518
SGMA						
Net Grant Project	General	\$73,000	\$104,000	\$99,000	\$0	\$0
Other Costs	General	\$40,000	\$40,000	\$40,000	\$40,000	\$40,000
Contingency	No Inflation	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000
Total O&M		\$1,227,800	\$1,296,552	\$1,330,669	\$1,272,201	\$1,314,200