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Talking Points for BPECC Seminar, Alternative Schedule Policy

Regulation 11.39 and Policy 7 (4.1) (a) (iv) states that if a water supplier is unable to meet the 120 day deadline, they need to consult with the Department for an approved Alternative Schedule. The following discussion is on what Denver Water is currently doing in regards to compliance with these sections.

We currently break down our policy into two sections- *Qualified* and *Ad-Hoc*. We are defining a Qualified Alternative Schedule for customers that are in an “account transfer” process where there is a change of ownership taking place. Another might be where an irrigation assembly has been winterized and unable to be tested. These are situations where the same *specific* time frame may be given to allow the customer to achieve compliance.

The Ad-Hoc scenario will generally be all other scenarios where the additional time needed may vary from a week to a year or more- depending on the scenario. Some examples of this may be waiting for repair parts that needed ordered, a possible financial hardship requirement for a larger assembly, the installation of an assembly on a fire line that previously only had a single check (issues with hydraulic capabilities, sprinkler sizing, etc.), or properties that are being demolished or under renovation. Other issues to consider will be the bid process, parent company or director approvals, permit processes- these don't just happen overnight. Another issue is as simple as the customer that is past the allowable 120 day deadline but has a test scheduled 4 days after.

So the big question is – what do we do? How do we comply? Here is what we currently do here at Denver Water. And it's actually pretty basic.

**Ad-Hoc Installations** Letter of Intent is necessary

1. Before there is any installation requirement, we survey the property first to determine the backflow needs (and to make any needed corrections to our records).
2. Then, the customer is given an inspection notice that details any installation requirements including the type of assembly needing installation and is automatically given an initial 60 days to install. Why 60 instead of 120? After 60 days, our suspension process kicks in, which uses the remainder of that time.
3. This 60 day installation request also serves to give the customer time to give us the Letter of Intent if the install will take longer than that. Although the customer may not be able to give us a specific end date due to approvals, bid processes, etc., at least it is a start.
  - a. What is a Letter of Intent? This is a document provided by the customer that acknowledges an installation requirement and a potential date of installation. We are currently accepting this on company letterhead or in an e-mail form. These documents are then saved in our backflow database as a reference.
4. We then input that information into certain fields in Tokay, which manages the expiration dates and the account from there. In Tokay we track:
  - a. The date the customer gave us the Letter of Intent.
  - b. The date we would request the Alternative Schedule from CDPHE.
  - c. The date the Alternative Schedule expires.
5. If we are unable to make contact with the customer, a suspension of service may occur.

6. If the customer has not completed the installation by the expiration date of the Alternative Schedule, it shows up on our Suspension of Service list provided by Tokay that we process on a weekly basis. At this point, customer contact is made for an update on the account. If more time is needed, the Alternative Schedule process (letter of intent, CDPHE request, set expiration date) is followed again.

**Qualified Installations** No letter of intent is necessary

1. These situations are generally considered to be the same type of situation, every time. Our current two examples are Account Transfers and irrigations surveyed in winter.
2. With the Account Transfers, sometimes the customer doesn't receive our install or test due letters.
  - a. *Installs*: For install campaigns, we restart the 120-day clock by restarting the letter cycle and modifying the install due date to be two months after today's date. (60 day install)
  - b. *Test due*: For test due campaigns, we restart the 90-day clock by restarting the letter cycle and modifying the test due date to be one month after today's date.

**Test Due Scenarios**

1. Currently, the only time that we use an Alternative Schedule for testing situations would be when they have entered our suspension process, contacted us and have given us a *reasonable* scheduled date for testing, no longer than a week or two out. If the customer is giving us a time frame longer than that, we are recommending they use another testing company.
2. We then set the Alternative Schedule to expire 3 or 4 days past the scheduled test date in order to receive the test report.

**Letters**

Test Due: reminder, past due, suspension

Installation: 1<sup>st</sup> notice, 2<sup>nd</sup> notice, suspension