PROTECTING CONNECTICUT’S WATER QUALITY

Connecticut’s public water suppliers are committed to providing residents and businesses with safe, high quality public water supplies at a reasonable cost. Given growing concerns regarding the possible health risks associated with certain per- and polyfluoroalkyl substances (PFAS) and EPA’s protracted process for setting standards for emerging contaminants, CWWA recognizes that the state is interested in moving forward to develop drinking water standards or revise action levels to respond to these concerns. CWWA recommends if Connecticut pursues a state specific programs for PFAS, they should consider the following approach:

• Utilize a comprehensive approach in addressing concerns regarding PFAS, including 1) preventing the introduction of PFAS in the environment; and 2) remediating areas that are contaminated with PFAS;

• Support the establishment of a Safe Drinking Water Advisory Council which includes toxicologists, hydrologists, scientists, engineers, water utilities, economists, and other experts to provide guidance in the development of drinking water standards and action levels;

• Ensure that any drinking water standards are developed using a scientifically defensible, risk-based and data-driven process to ensure that standards are truly protective of the public health;

• Public water suppliers must be provided with clear, consistent guidance and reasonable compliance timeframes to address any PFAS contamination, which may involve costly treatment processes; and

• Support continued funding for the Public Water System Improvement Program to assist water companies in complying with new state and federal requirements regarding PFAS.

In addition, EPA has initiated revisions to the Lead and Copper Rule which will require public water suppliers and other water systems, such as schools, to address concerns regarding lead levels in drinking water. On the state level, CWWA supports the following recommendations:

• Assist the state in addressing lead in drinking water by 1) supporting efforts to encourage school systems to test and monitor for lead; 2) developing programs to assist consumers in identifying potential sources of lead in their homes, businesses, and institutional buildings and assist them in identifying how to mitigate those risks; 3) developing strategies and funding to encourage the replacement of customer lead service lines; and 4) developing public education and outreach materials concerning lead in drinking water, particularly schools.

CONNECTICUT’S STATE WATER PLAN

In 2019, Connecticut adopted a comprehensive State Water Plan to guide decisions affecting Connecticut’s water resources. Connecticut’s public water suppliers are actively involved in efforts to implement the Plan in a way that will continue to ensure the availability of safe, high quality drinking water for Connecticut residents and businesses. As the state moves forward with implementation of the Plan, CWWA supports the following recommendations:

• Provide adequate state resources to support the implementation of the State Water Plan;

• Protect the availability and quality of public water supplies to meet the existing and future public health, safety, and economic development needs of customers and communities;

• Implement Connecticut’s Drought Preparedness and Response Plan and strengthen mechanisms for enforcing water use restrictions during periods of drought and other water supply emergencies; and

• Preserve the continued use of registered and permitted diversions, recognizing that water companies and other entities have made long term investment and planning decisions based upon the availability of registered and permitted diversions to meet existing and future needs of customers and communities.

SOURCE WATER PROTECTION

Source water protection is critical to ensuring the safety and quality of Connecticut’s public water supplies. Protecting source water from contamination can reduce treatment costs and risks to public health. CWWA supports the following recommendations:
• Encourage Green Snow Pro training and certification to promote best management practices and reduce impacts of deicing chemicals on public water supply sources;
• Continue to fund the state’s Open Space & Watershed Acquisition program, which has been a successful tool in protecting watershed lands; and
• Expand the state’s efforts to address invasive species/plants.

COST AND OPERATIONAL ISSUES
As water companies strive to provide customers with safe, adequate public water supplies at a reasonable cost, they are challenged by the costs to comply with new state and federal laws and regulations which require significant investment. To assist water companies in controlling costs for customers, CWWA supports the following recommendations:
• Ensure that the state prioritizes compliance issues and provides water companies with greater flexibility and time to meet new requirements;
• Support continued funding for the Public Water System Improvement Program to assist water companies in replacing aging infrastructure and complying with new state and federal requirements regarding emerging contaminants, Manganese, and the replacement of lead service lines;
• Authorize water companies to recover Construction Work In Progress (CWIP) for major improvements to water treatment systems;
• Alleviate unnecessary costs and inconsistencies associated with state Department of Transportation road repair requirements, such as compaction testing; and
• Assist water companies in addressing cybersecurity and other threats.

SAFE DRINKING WATER FEE
To ensure that revenues generated under the Safe Drinking Water Fee are used judiciously to support staffing needed to preserve the primacy role of the state Department of Public Health (DPH), CWWA supports the following recommendations:
• Maintain the cap on the Safe Drinking Water Fee at $3.00 per service connection and the sunset provision to ensure that water customers are not overburdened;
• Continue to require DPH to account for how monies collected for the Safe Drinking Water Fee are effectively utilized and steps taken to adopt more efficient regulatory processes to minimize the cost burdens for water customers; and
• Continue to encourage DPH to streamline various regulatory programs and requirements, including exempting routine/minor activities performed on water company lands from DPH’s change of use permit.

WATER/ENERGY NEXUS
Water treatment and distribution systems are very energy intensive. As such, energy efficiency programs are critical to water utilities in controlling costs and customer rates as well as in promoting water conservation. CWWA supports the following recommendations:
• Expand opportunities for water companies to reduce energy costs and improve energy efficiency; and
• Ensure that the Public Utilities Regulatory Authority (PURA) ratemaking policies reflect investments and operating expenses needed to support increased energy efficiency at water utilities.

SMALL WATER SYSTEM CONCERNS
Hundreds of small water systems, including condominium and homeowners’ associations, mobile home parks, and convenience stores, often fail to properly maintain water systems, creating public health and safety concerns for customers, DPH and local health agencies. CWWA supports the following recommendations:
• Require greater accountability and compliance from small system operators to ensure adequate rates to support the system needs to ensure quality of service for their customers;
• Streamline the approval processes for acquisitions of small systems by viable water companies;
• Promote “Municipal Utility Asset Valuation” which allows a private water company to pay
for and recover the appraised market value of municipal utility assets in a mutually agreed upon transfer; and

• Support revisions to Connecticut's Drinking Water State Revolving Fund to assist small systems in addressing infrastructure needs, including interconnections and regional solutions, to ensure that costs are not borne by customers of companies asked to acquire failing systems.

WORKFORCE DEVELOPMENT

Connecticut’s water companies employ approximately 5,000 people throughout the state in a wide range of positions. However, there have been an unprecedented number of retirements in the industry and water companies are struggling to find qualified applicants. CWWA supports the following recommendations:

• Address barriers facing individuals in obtaining operator certification, including clarifying licensing reciprocity opportunities and recognizing credit for work experience, including military experience;

• Support and expand programs for distribution and treatment operators and water management at Gateway Community college and Southern Connecticut State University;

• Support efforts to promote career opportunities in the water industry and integrate water resources education into the secondary and technical high school curriculum; and

• Ensure that initiatives to support the growth of “green” jobs, including training programs and incentives, include jobs in the water sector.

Questions? Please contact CWWA’s Executive Director Betsy Gara at gara@gmlobbying.com or 860-841-7350.