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President
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Before the Public Health Committee
March 6, 2009

RE: RB-6617, An Act Concerning Water Supply Plans

Torrington Water Company strongly supports HB-6617, An Act Concerning Water Supply Plans, which will make changes to the water supply plan process to improve the efficiency of the filing process and reflect the need for greater information regarding a water utility's infrastructure replacement program.

Under current law, water utilities supplying water to 1000 or more persons or 250 or more consumers are required to prepare a water supply plan and submit such plan to the state Department of Public Health for review and approval. The plan is quite extensive and must include a detailed description of the existing water supply system, including maps, schematics and descriptions of existing state, local and regional land use plans. The plan must also include an analysis of present and future water supply demands based on five, twenty and fifty year planning horizons. It is simply unnecessary to require a plan detailing this type of long-range planning every five years.

Moreover, given the limited resources of the state Department of Public Health and the voluminous nature of water supply plans, there are often significant delays in obtaining approval of such plans. In fact, some utilities find that they have only just recently received approval of the plan and the next filing deadline is upon them.

Costs associated with updating a water supply plan range from \$30,000 - \$100,000 per utility. In addition, the plan is reviewed by several state agencies, which may require utilities to respond to certain questions and comments, resulting in additional costs to the utility, which often relies upon an outside consultant to prepare the plan. Utilities are also frustrated that there are times when the department will request feedback on portions of the plan, although such information has not changed at all from the original filing.

To its credit, the state Department of Public Health has taken the lead on developing a better framework for plan submittals, which will ensure that plans are prepared in a more consistent format. Based on our conversations with them, we believe this will improve the efficiency of the review process and reduce the need for follow-up responses/revisions. We certainly appreciate their efforts in this area.

It is our understanding that the department is also interpreting the current law to simply require revisions to the plan, rather than complete plans, to be filed once the original water supply plan has been approved. The department would, however, have the discretion to request more frequent revisions where warranted. The legislation therefore reflects this interpretation.

We also understand that the department is looking to key the filing deadlines off the three-year cycle required for the Consumer Confidence Reports. Therefore, rather than a 10 year timeframe, we recommend a nine-year timeframe.

The bill also calls for the water supply plan to include information concerning water infrastructure replacement. Many of Connecticut's public water systems were built in the late 1800's. Although utilities

have spent considerable sums in maintaining and replacing infrastructure, we need to encourage and support utilities in developing and implementing infrastructure replacement plans. Aged and deteriorated water mains can result in poor service for customers due to increased main breaks, frequent service interruptions, low pressure, discolored water, compromised water quality, inadequate fire protection and greater amounts of wasted water resources due to leaks. Requiring utilities to provide this information in the water supply plan is a positive step in the right direction.

We have also discussed the need to address ways to ensure that information that is security related, and therefore protected from disclosure under the state Freedom of Information Act, does not preclude the opportunity to review portions of the water supply plan which are not security related. We are committed to working with the Rivers Alliance and other environmental organizations to this end.

The Torrington Water Company urges you to support this bill, which will improve the efficiency of the state review process and provide a strong foundation for guiding effective water infrastructure replacement practices.