



**Testimony**  
**Connecticut Water Works Association (CWWA)**  
**Before the**  
**Environment Committee**  
**February 22, 2010**

**Re: SUPPORT – SB-120, AN ACT AUTHORIZING REVIEW OF  
THE DEP’S GUIDANCE STATEMENTS AND POLICIES BY THE  
GENERAL ASSEMBLY’S REGULATION REVIEW COMMITTEE**

The Connecticut Water Works Association supports SB-120, which will end DEP’s practice of regulating through guidance documents and instead, ensure that such directives proceed through the regulation-making process which includes notice and a comment period.

Connecticut’s public water suppliers have an excellent track record of compliance with the state’s numerous laws and regulations governing water resources. Given the nature of the water industry, these regulations are often complex and far-reaching and require the input and expertise of water industry professionals and other experts to ensure that they are drafted in a way that does not undermine the ability of public waters suppliers to meet the public health and safety needs of its customers.

As such, we closely monitor the regulation-making process and provide considerable input on proposed regulations affecting our ability to provide sufficient quantities of high quality water to consumers at a reasonable cost. Under the Connecticut Uniform Administrative Procedures Act, in addition to public notice and an opportunity to comment, regulations must also be approved by the legislature’s Regulations Review Committee. This provides an important check in the process that ensures that agencies do not exceed their statutory authority in developing policies. It also gives lawmakers the opportunity to consider the impact of the proposed policies on the regulated community. Unfortunately, guidance documents, which may include significant, far-reaching changes in public policy, undergo no such process.

We therefore urge support for SB-120, which will provide a more balanced, democratic framework for adopting new environmental policies in Connecticut.

*The Connecticut Water Works Association, Inc. (CWWA) is an association of public water supply utilities serving more than 500,000 customers, or population of about 2½ million people, located throughout Connecticut.*