



**Testimony**  
**Elizabeth Gara**  
**Connecticut Water Works Association (CWWA)**  
**Before the**  
**Energy Committee**  
**March 8, 2011**

**Re: HB-6403 - AN ACT CONCERNING UTILITY TERMINATION FOR HOUSEHOLDS WITH A MEMBER LESS THAN TWENTY-FOUR MONTHS OLD.**

Although this proposal is certainly well-intentioned, the Connecticut Water Works Association (CWWA), an association of public water supply utilities, believes that it creates insurmountable compliance and operational issues. This statute has been inexplicably interpreted to apply to water utilities under certain circumstances and we therefore would like to comment on concerns that we have relative to the proposed language.

Current law already provides generous notice requirements before water utility service may be terminated for non-payment. As such, water utilities cannot send a delinquent notice until 63 days after mailing the quarterly bill or 33 days after mailing a monthly bill. Service cannot be terminated until an additional 13 days have passed. This totals 76 days – approximately 2 1/2 months - after the bill was initially mailed and 166 days after the first day of service in a quarterly bill, before service can be terminated for non-payment. It is important for water companies to recover revenues from customers who fail to pay their bills in order to minimize the impact on those customers who do pay their bills in a timely manner.

We do not know how many customers this bill may affect, but it may affect a significant percentage of customers, creating cash flow and administrative burdens for utilities if numerous customers take advantage of this provision in order not to pay their bill. In addition, individuals who have trouble paying their bills are going to find it much more difficult to make arrangements to pay bills as much as two years in arrears once the child is more than two years of age.

The bill does not include any mechanism for confirming the presence of, age, or relationship of the child in the home, making it difficult for utilities to comply. For example, in order to comply with the current requirement relative to termination where an individual has a severe illness, we rely on certification from a doctor who is an independent third party and whose credentials are at stake. However, there is no similar mechanism included in the bill, leaving the provision open to abuse.

Inasmuch as water service is not comparable to other utility service in that termination will not create life threatening circumstances, we would suggest that this law be further clarified to ensure that none of these provisions are applicable to water service.