

Testimony
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South Norwalk Electric and Water (SNEW) is **opposed to HB-6505**, which extends the proposed stream flow regulations to groundwater withdrawals even though, at this point in negotiations, the proposed regulations fail to adequately balance the many competing needs and uses of Connecticut's natural water resources.

SNEW is in support of the intent of the enabling legislation. The key is to develop stream flow regulations that are in balance with all competing uses of the state's natural resources. It is essential that the needs of public water supply for the health and safety of the citizens of Connecticut are taken into account within any proposed regulations. However, the regulations do not provide adequate balance by imposing excessive release requirements to all streams in the state while only a relatively small number of streams have been designated as flow impaired.

As currently drafted, the regulations will result in a reduction in water resources available to meet the water supply needs of SNEW customers, as well as those of many other public water supply systems in Connecticut. The regulations will result in a reduction in the safe yield of our system, creating a supply deficit that will impact the water supply available for public health and safety. Impacts that are likely to result include reduced ability to meet water supply demands including needs for fire protection and sanitation, more frequent drought restrictions, significant and more frequent rate increases, reduced water quality, significant costs to modify existing infrastructure to ensure compliance and the need to develop additional sources of supply.

These potential impacts will result in economic hardship to many residents and businesses, and will hinder the economic recovery efforts within the state of Connecticut. Depending on how the regulations are revised, the order of magnitude of needed sources of supply to make up for this will be considerable, based on current analysis of the impact on the safe yield of Connecticut systems conducted to date. However, the availability of these additional sources is unknown, the ability for the state to permit the required quantity of supply needed is questionable and the potential environmental impacts resulting from the development of such new sources may likely exceed the possible environmental benefits gained from the releases required by the regulations.

These concerns will be intensified under HB-6505 because we would then have to factor in the impact to groundwater withdrawals. Moreover, the regulations provide no provisions to measure the environmental benefits derived and compare them with the costs associated with implementation. The costs imposed by the regulations include: major environmental impacts resulting from developing new sources of supply; significant costs to develop and construct additional sources of supply; costs to install infrastructure to make and monitor the releases; costs associated with additional and more frequent drought restrictions; costs associated with managing frequent release adjustments; additional costs associated with water treatment; and economic impacts on businesses and residents in Connecticut.

We urge your rejection of HB-6505, An Act Concerning Stream Flow Regulations.