



**Testimony
Connecticut Water Works Association (CWWA)
Before the
General Law Committee
Public Hearing
March 6, 2012**

The Connecticut Water Works Association (CWWA) *opposes* the broad reach of SB-315, which prohibits businesses from using social security numbers to identify customers.

Social security numbers are a legitimate tool used by many water companies to ensure the customer's proper identification when extending services. The use of such identification numbers can also protect against identity theft by allowing us to confirm that service is being taken and paid for in a lawful manner.

The water industry treats its obligation to protect the privacy of its customers very seriously. As such, our members are committed to protecting the confidentiality of social security numbers and other private information. Public Act 08-167 required businesses that collect social security numbers to develop and post a policy concerning their security practices and those in possession of social security numbers to safeguard that information. The law requires that any person who collects Social Security numbers in the course of business to create a written privacy protection policy that is "published or publicly displayed." The written policy must: (1) Protect the confidentiality of Social Security numbers, (2) prohibit unlawful disclosure of Social Security numbers, and (3) limit access to Social Security numbers.

Accordingly, our member companies restrict access to information or documents containing social security numbers to employees who have a legitimate business reason to access such information or documents. In accordance with the law, social security numbers are not be placed on identification cards, badges, time cards, employee rosters, bulletin boards, permits, licenses or any other materials or documents designed for public display. Any documents, materials or computer screens that display all or more than four sequential digits of a social security number are kept out of public view at all times.

Prohibiting businesses, including water companies from using social security numbers would require us to issue a new identification number to each and every customer and revamp our systems to reflect the different numbers. In addition to being costly, this would be inconvenient for customers, who are comfortable with using their social security numbers for identification purposes.

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. Membership in the Association is open to all Connecticut water utilities: investor-owned, municipal and regional authorities. As purveyors of public water supplies, our members have an obligation to provide sufficient quantities of high-quality water at a reasonable cost to consumers of the communities served.