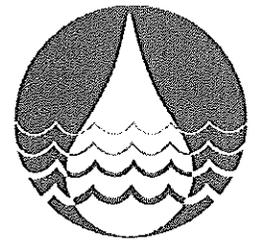


Connecticut
Association of
Water
Pollution
Control
Authorities, Inc.

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CONNECTICUT ASSOCIATION OF WATER POLLUTION CONTROL AUTHORITIES

March 16, 2013

Connecticut General Assembly
Planning and Development Committee
Legislative Office Building
Hartford, Connecticut 06106

Attention: Committee Chairs Senator Steve Cassano and Representative Jason Rojas
Committee Vice Chairs Senator Catherine Osten and Representative Daniel Fox
Ranking Members Senator Len Fasano and Representative Bill Aman

Subject: OPPOSITION OF RAISED BILL-1111; An Act Concerning Rate Increases by Water Pollution Control Authorities Receiving State Grants for Water Pollution Control Projects

The Connecticut Association of Water Pollution Control Authorities is a statewide association open to WPCAs and public entities authorized to own or operate wastewater systems. With over 40 active members providing wastewater services to nearly 1,000,000 citizens in the state and we are pleased to submit comments on Senate Bill-1111; An Act Concerning Rate Increases by Water Pollution Control Authorities Receiving State Grants for Water Pollution Control Projects

Nearly every municipal sewerage system operating in Connecticut, has received State grants for water pollution control projects. Therefore, this proposed legislation directly affects many if not all of our members.

Annually Water Pollution Control Authorities prepare a sewer operating and capital budget and establishes rates necessary to meet the obligations of operating the municipal sewerage system in an extremely transparent manner. In accordance with Connecticut General Statutes Section 7-255, these rates are noticed, posted, and presented at a public hearing "at which the owner of property against which the charges are to be levied has the opportunity to be heard concerning the proposed charges." The state statutes include a process where anyone may appeal the rate charges if a particular party feels aggrieved by the rates established under this system.

As drafted, the proposed legislation would effectively create veto authority for elected officials whose interests may not be consistent with the efficient operation of a wastewater treatment system. Such veto authority would circumvent the establishment of fair and reasonable rates. This legislation, if adopted, would effectively give veto power to elected officials who represent minority interests in a system. Additionally, such veto authority could render the hosting municipal WPCA to have funds only to meet the bonding requirements as set forth in Connecticut General Statute Section 7-256.

This would result in risking the host WPCA's ability to meet discharge requirements, thereby causing environmental pollution and putting the host WPCA at risk of permit violations and fines.

Such legislation would require every host municipality of a wastewater treatment facility to seriously consider if it would be economically feasible or prudent to continue to serve the sewer needs of customers outside of the city/town limits.

Given there are already many opportunities for all impacted customers to participate in the rate adoption process, and appeal the charges should they feel aggrieved by the adopted rates, there is no reason to create the veto authority proposed by this legislation. Therefore, we strongly encourage you to oppose this legislation. Thank you for the opportunity to comment.

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