



Testimony
Connecticut Water Works Association (CWWA)
Before the
General Law Committee
Public Hearing
February 3, 2015

The Connecticut Water Works Association (CWWA) has concerns regarding **SB-66, AN ACT PROHIBITING THE USE OF SOCIAL SECURITY NUMBERS IN CERTAIN CONSUMER TRANSACTIONS.**

As proposed, SB-66 would prohibit retail businesses from requiring persons to provide social security numbers in consumer transactions in order to gain access to an Internet web site or to enter into a retail business's computer system.

It is unclear, as currently proposed, whether this bill would be applicable to water utilities that utilize social security numbers to verify a customer's identification. Some water utilities continue to require social security numbers to verify identity when extending services or disconnecting services. In fact, private water utilities are authorized by the state's Public Utilities Regulatory Authority (PURA) to use social security numbers as a means of identification pursuant to Section 16-3-100, Regulations of State Agencies.

Recognizing the importance of protecting the privacy of its customers, water utilities adhere to privacy policies established under state and federal law. For example, Public Act 08-167 requires 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 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 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 water companies from using social security numbers to verify a customer's identity may delay timely collections, particularly in cases where landlords with multiple properties on a system may try to use the statutory protections for terminating water service to tenants to avoid payment to a utility. It may also require the issuance of new identification numbers to each and every customer and software changes to computer and telephone systems, which would be costly as well as inconvenient for customers.

The Connecticut Water Works Association, Inc. (CWWA) is a trade association of private, municipal and regional water utilities. 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.