



**Testimony  
Elizabeth Gara  
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Before the  
GAE Committee  
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The Connecticut Water Works Association (CWWA) appreciates the opportunity to comment in support of **SB-744, AN ACT ESTABLISHING A FIXED TIME PERIOD FOR AGENCY REVIEW OF EXISTING REGULATIONS**, which requires agencies to submit a review of their existing regulations every four years to the legislature's Regulations Review Committee.

Pursuant to Governor Malloy's Executive Order 37, our members - municipal water departments, private water companies and regional water authorities - identified several laws and regulations that are outdated, burdensome or otherwise inefficient. We also regularly work with state agencies that regulate the water industry to address issues and concerns regarding the scope or administration of various regulations and suggest possible revisions.

However, given existing staff and resource constraints, an agency's priorities generally do not include reviewing existing regulations to determine whether they could be streamlined or otherwise revised to achieve the department's goals without imposing unnecessary compliance burdens on regulated entities.

Moreover, there are many instances where concerns arise due to the interpretation or application of the regulations by agency staff and not the regulations as promulgated. Under these circumstances, it may be necessary to clarify or narrow the scope of the regulations to better reflect the intent of the enabling legislation.

In addition, complex regulations that may require considerable investment and planning often provide regulated entities with a longer time period in which to comply with the requirements of the regulations. For example, when the state Department of Energy and Environmental Protection (DEEP) promulgated revised stream flow regulations, concerns were raised regarding the enormous fiscal impact on water utilities and their customers as well as municipalities with municipal water departments. These included costs associated with modify dams and distribution systems, developing new sources, flow monitoring, etc. To assist in addressing the concerns, DEEP extended the timeframe for compliance.

Under current law, however, state agencies are only required to look three years out in determining the fiscal impact of proposed regulations. This is inadequate from a budgeting standpoint because it does not reflect costs associated with compliance beyond the first three years. SB-744 would ensure that such regulations are subject to further review and consideration.

CWWA therefore supports SB-744, which would ensure that an ongoing review of agency regulations is a priority. Establishing a formal process for reviewing agency regulations on an ongoing basis is vital to improving the efficiency of state government and ensuring that the state does not impose unnecessary and duplicative burdens on businesses operating in this state.

In addition, CWWA recommends that the review process include an opportunity for public comment to ensure that regulated entities have a voice in efforts to improve the state's regulatory climate.

Thank you for the opportunity to comment.

*The Connecticut Water Works Association, Inc. (CWWA) is an association of private, municipal and regional public water supply utilities serving a population of about 2½ million people, located throughout Connecticut.*