



Testimony
Elizabeth Gara
Connecticut Water Works Association (CWVA)
Before the
Planning & Development Committee
March 11, 2016

The Connecticut Water Works Association (CWVA), which represents municipal, regional and investor-owned water companies, **opposes SB-420, AN ACT ESTABLISHING A PILOT PROGRAM TO IDENTIFY RESIDENTS WITH UNMET NEEDS BASED ON UNPAID WATER UTILITY BILLS.**

SB-420 requires the Office of Policy and Management (OPM) to identify residential water utility customers whose service has been terminated by a water company at least once in the previous twenty-four months due to a late payment or unpaid bill and whose water utility accounts reflect unpaid balances of one hundred fifty dollars or more.

Recognizing the need to maintain the privacy of customers, water utilities are not permitted to share information regarding bill or other account information with anyone other than the customer of record. In addition, water utilities are required to implement policies to safeguard the privacy of customer information under state and federal laws, including the Federal Red Flag Program, and the Fair and Accurate Credit Transactions Act (FACTA) of 2003. By requiring utilities to provide information to OPM regarding service terminations, SB-420 undermines the ability of water utilities to protect the privacy of such information.

In addition, water utility bills go unpaid for a variety of reasons and may not necessarily be a determinant of unmet needs. Some people simply neglect to pay their bills until the water utility shows up to disconnect service. Under the bill, however, these people “shall be deemed residents with unmet needs” – a designation that would trouble many customers.

Given the sheer volume of shut off notices that are sent, this bill will require an overwhelming amount of information to be sent to OPM for review. It will also impose a considerable burden on water utilities to update systems in order to track whether a customer was shut off at least once in the previous twenty-four months due to a late payment or unpaid bill and whose water utility accounts reflect unpaid balances of one hundred fifty dollars or more. Although utilities know when service is shut off, most utilities do not normally 'age' or otherwise track those, except to take action to restore once payment is received.

We can appreciate that many residents are facing financial hardships and we would be happy to work with the proponents of the bill and/or OPM to review trends in water utility collections and potential opportunities to develop programs to assist customers in need. However, as drafted, CWVA opposes SB-420, which would undermine privacy protections and impose administrative burdens on water companies.

