Testimony to the Public Health Committee

March 20, 2017

SB 797 An Act Implementing the Governor’s Budget Recommendations for Public Health Programs

The South Central Connecticut Regional Water Authority (RWA) is a non-profit, public corporation and political subdivision of the state. Our mission is to provide our customers with high quality water at a reasonable cost while promoting the preservation of watershed land and aquifers. We provide approximately 45 million gallons of water per day to some 430,000 consumers in 15 communities in our region. The source of this water is a system of watershed and aquifer areas that cover about 120 square miles within 24 municipalities. Much of our 27,000 acres of land is managed for watershed protection, timber resource conservation, wildlife habitat, open space, education, and research.

Thank you for the opportunity to provide testimony on Senate Bill 797, An Act Implementing the Governor’s Budget Recommendations for Public Health Programs.

The RWA recognizes the importance of providing adequate staffing for the Connecticut Department of Public Health’s (DPH) Drinking Water Section (DWS) to fulfill its essential functions associated with implementing federal and state drinking water laws. We do conditionally support the concept of a fee to fund the programs of the DWS, provided proceeds are permanently dedicated to the DWS and that the fee structure is designed and administered in a manner that maximizes benefits to public water consumers.

The RWA is regulated in all matters related to the protection of public water drinking supplies and quality by the DWS. The DWS is required by the US Environmental Protection Agency to be responsible for the administration of drinking water regulations developed under the federal Safe Drinking Water Act (SDWA) and is dedicated to ensuring the adequacy and quality of the State of Connecticut’s public drinking water sources.

State public health agencies’ missions, knowledge, experience, and purpose are to protect public drinking water supplies and the health of its citizens. Connecticut’s delegated authority is a vital benefit, ensuring that technical, financial, and human resources are readily accessible to state residents and water utilities, and maintaining consistency with Connecticut’s unique and protective approaches for managing the quality and quantity of public drinking water from source to tap.
Although we support the concept of a fee to ensure the DPH’s DWS can fulfill its SDWA compliance responsibilities, we believe SB 797 needs the following important modifications to ensure that a fee program is efficiently designed and administered, and that all proceeds directly benefit public water supply customers, such that:

- The funds received are specifically dedicated to the DWS for the purpose of fulfilling its primacy role in administering and enforcing the SDWA;
- The funds are permanently earmarked for the DWS as opposed to being directed to the General Fund;
- An effective and efficient alternative fee structure is established that does not involve a water company licensing program. The RWA is already subject to extensive local, state, and federal regulations governing their operations, including source water protection, water quality, water treatment, distribution, water conservation, water supply planning, emergency response, asset management, ratemaking, land use, and monitoring, etc. A new licensing program would add an unneeded layer of redundancy, and administrative costs to both state agencies and public water supply customers that would significantly divert financial resources from DWS’s primary mission of protecting public health. We suggest in lieu of a burdensome licensing program, that the state study the establishment of a “drinking primacy fee” in the form of a dedicated user fee on water customer bills, similar to that used in other states such as Missouri;
- The DPH and Office of Policy and Management (OPM) are required to consult with the Connecticut Water Works Association (CWWA) to design and implement the fee structure. Such structure should: 1) address how to effectively administer the fee program with minimal impact on water utility ratemaking processes; 2) provide clear criteria for setting and adjusting the fee amount; 3) fully examine DWS procedures used to administer their programs, and implement changes as necessary to ensure that all reasonable and appropriate measures are taken to make efficient use of existing staff and resources.

Thank you for the opportunity to express our position. If you have any questions, please contact Lori Vitagliano, Government and Public Relations Specialist at 203-401-2720, or lvitagliano@rwater.com