



**Testimony
Elizabeth Gara
Connecticut Water Works Association
Before the
Environment Committee
February 23, 2018**

The Connecticut Water Works Association (CWWA), a trade association of municipal, regional and private water companies, submits the following comments in **support** of **SB-105 - AN ACT ENSURING CONTINUING WATER SERVICE FOR CERTAIN MUNICIPALITIES**.

SB-105 authorizes the Town of Durham to use up to 100,000 gallons per day during the Durham Fair without obtaining a diversion permit. This bill underscores a longstanding concern that the current threshold of 50,000 gallons per day, which triggers the need for a diversion permit, is problematic and warrants review.

According to the final report of a subcommittee of the Water Planning Council, there is no clear basis or reasoning for the present threshold triggering a diversion permit requirement. A permit is needed if one withdraws 50,000 gallons a day or more on any single day within the year. Thus, someone who withdraws 51,000 gallons annually needs a permit; whereas someone who withdraws 49,000 gallons every single day of the year does not need a permit.

Inasmuch as staffing and delays in processing permits have been an ongoing problem with the state Department of Energy and Environmental Protection, exempting withdrawals of a limited duration, such as the Durham Fair, makes a lot of sense and ensures that limited DEEP staff can focus on activities that truly warrant additional review. In addition, the diversion permitting process is costly and protracted for applicants, which is unnecessarily burdensome in situations involving a permit of limited duration.

CWWA urges your support for SB-105.

The Connecticut Water Works Association, Inc. (CWWA) is an association of private, municipal and regional public water supply utilities serving more than 500,000 customers, or a population of about 2 1/2 million people, located throughout Connecticut. 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.