



**Testimony**  
**Elizabeth Gara**  
**Connecticut Water Works Association (CWVA)**  
**Before the**  
**General Law Committee**  
**February 25, 2021**

The Connecticut Water Works Association (CWVA), which represents municipal, private and regional water companies, has concerns regarding **SB-156 and SB-893, AN ACT CONCERNING CONSUMER PRIVACY**.

CWVA understands that the bills are intended to address concerns regarding personal data collection and distribution by large companies. However, as drafted, we are concerned that it would impose confusing, costly requirements on other companies that must obtain personal data to serve their customers and manage employees and vendors.

Recognizing the importance of protecting sensitive customer and employee information from disclosure, water utilities maintain compliance with existing state and federal consumer privacy laws and regulations. Under current law, the Federal Trade Commission (FTC) vigorously oversees and enforces consumer privacy laws. FTC's consumer privacy protections recognize, however, that actions that must be taken when personal or business data is compromised may vary from case to case.

Federal consumer privacy laws also facilitate compliance by providing clear, consistent, directives that companies must adhere to relative to the protection of consumer data. This is beneficial for companies as well as customers and employees.

For example, water utilities considered creditors under the FTC's Red Flags Rule are required to develop a written program to detect, prevent and minimize the damage that could result from disclosure of private customer information. In addition, the Public Utilities Regulatory Authority (PURA) has developed cybersecurity requirements for public service companies, including PURA regulated water companies, to safeguard the integrity of customer information and other sensitive data.

CWVA is concerned that SB-156 and SB-893 will unnecessarily subject companies to requirements that will impose additional compliance costs on companies, including water utilities. Costs for software, technology, recordkeeping, training and other operational issues will add an unnecessary burden on the state's water utilities and our customers.

Thank you for the opportunity to submit comments regarding concerns with these bills.



*The Connecticut Water Works Association, Inc. (CWNA) 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.*