



To: Appropriations, Energy & Technology and Human Services Committees

From: Betsy Gara, Executive Director, Connecticut Water Works Association

Date: August 20, 2021

Re: **Comments - Public Hearing re: LIHEAP and LIHWAP Allocation Plans**

The Connecticut Water Works Association (CWVA) is a trade association of municipal, regional and investor-owned water companies that provide water service to residents and businesses throughout Connecticut.

CWVA appreciates the opportunity to provide comments in support of the Low Income Household Water Assistance Program (LIHWAP) Allocation Plan, a program which is funded through the Consolidated Appropriations Act of 2021 and the American Rescue Plan Act of 2021.

Under these acts, the purpose of the LIHWAP program, which CWVA strongly supports, is to “assist low-income households, particularly those with the lowest incomes, that pay a high proportion of household income for drinking water and wastewater services, by providing funds to owners or operators of public water systems or treatment works to reduce arrearages of and rates charged to such households for such services.”

Recognizing that many households are experiencing financial hardship due to the COVID-19 pandemic, CWVA supports efforts to assist customers in paying their bills to ensure continued access to safe, reliable public water supplies which are critical to public health and safety.

CWVA respectfully submits the following comments relative to the LIHWAP Allocation Plan:

Water Company Customers - Eligibility

The LIHWAP Allocation Plan recognizes that importance of making assistance available to privately-owned water company customers in addition to customers of municipal and regional water companies. As noted by the Office of Consumer Counsel in comments provided to the Department of Social Services (DSS), limiting the availability of funds to customers of municipal and regional water companies would unfairly impact thousands of customers served by private water companies throughout Connecticut.

Use of Funds

CWVA supports the use of funds outlined under the Allocation Plan, which specifies that LIHWAP funds may provide benefits to households to be applied to arrearages, reconnection and other



fees and charges. For the purposes of LIHWAP, arrearage refers to an unpaid past due bill for household drinking water and/or wastewater utility services. LIHWAP grant resources can be used to pay for arrearages incurred at any point in time by households that meet LIHWAP eligibility criteria and may include reconnection charges and fees.

In addition, CWVA supports efforts to ensure that the Allocation Plan allows the water company to apply partial payments to reduce customers' account balances. This will allow the water company and the customer to enter into a payment plan to pay off the remainder of the account balance. This is consistent with LIHWAP guidance which provides that rate reduction refers to full or partial payment of a currently due bill charged to a household for drinking water or wastewater services and may include standard charges and fees included in the household water bill.

Categorical Eligibility

Under the LIHWAP Allocation Plan, categorical eligibility refers to a determination that a household is eligible for LIHWAP assistance based on enrollment in another means-tested program including the Low-Income Home Energy Assistance Program (LIHEAP), the Temporary Assistance for Needy Families (TANF), the Supplemental Nutrition Assistance Program (SNAP), Supplemental Security Income (SSI), or means-tested Veterans Programs. If a household is determined to be categorically eligible, the income test does not have to be repeated for purposes of qualifying the household for LIHWAP assistance. Instead, staff can move forward with the benefit determination calculation by looking at the total household income as reported on the LIHWAP application. CWVA supports this streamlined process for determining eligibility, which will ensure that assistance is provided in a timely manner.

Processes for Providing Assistance

CWVA supports provisions in the LIHWAP guidance that indicate that water companies may use "existing processes, procedures, policies, and systems in place to provide assistance to low-income households, including using existing programs and program announcements, application and approval processes." Allowing water companies to use existing processes and systems to assist customers facing financial hardship will expedite the process for delivering assistance to eligible households.

Program Integrity

CWVA agrees with the comment raised by the Connecticut Water Company regarding the reference in Section VI of the plan relating to verification with the state Department of Consumer Protection in accordance with Section 16a-23m of the Connecticut General Statutes. As noted in their testimony, this statute references heating fuel dealers and is not applicable or appropriate for a water program and should be corrected.



Program Assistance and Guidance

CWWA is working with DSS and the Water Planning Council to provide information and guidance to water companies to facilitate the implementation of the program to meet the needs of water company customers. The following materials will be very helpful in assisting water companies in implementing the program: 1) Templates for vendor agreements; 2) Benefit matrix templates or examples; 3) Written guidance; 4) Webinars; and 5) Online tools.

Thank you for the opportunity to comment in support of the LIHWAP Allocation Plan.