



2021 Government Affairs Agenda

The Connecticut Water Works Association (CWWA) is a trade association of municipal, regional, and private water utilities committed to supporting legislative & regulatory policies that ensure that water utilities can continue to provide the state's residents and businesses with safe, high quality public water supplies at a reasonable cost. CWWA's members serve more than 2 ½ million people throughout Connecticut.

2021 LEGISLATIVE PRIORITIES

- Support the establishment of a Safe Drinking Water Advisory Council comprised of toxicologists, hydrologists, scientists, engineers, water utilities, economists, and other experts to ensure that any drinking water standards and action levels to address PFAS and other emerging contaminants are developed using a scientifically defensible, risk-based, and data-driven process.
- Ensure that meter replacements and device installations as part of an Automatic Meter installation program may be performed by qualified non-licensed installers subject to appropriate supervision.
- Adopt legislation requiring the CT Siting Council to fully consider the impact on water quality and quantity with regard to the siting of solar installations and other renewable energy facilities on watershed lands.
- Expand opportunities for water companies to reduce energy costs and improve energy efficiency, including increasing the cap on Virtual Net Metering (VNM) and making private and regional water utilities eligible to participate in VNM.
- Address barriers facing individuals in obtaining certification, including adopting legislation to clarify licensing reciprocity opportunities, and recognizing credit for work experience, including military experience.
- Increase funding for the Public Water System Improvement program to provide meaningful grants to water companies to fund infrastructure upgrades, including lead line replacement.

In addition to these priorities, CWWA's 2021 Government Affairs Agenda includes recommendations on a wide range of issues affecting Connecticut's public water supplies:

PROTECTING CONNECTICUT'S WATER QUALITY

Connecticut's public water suppliers are committed to providing residents and businesses with safe, high quality public water supplies at a reasonable cost. To

address growing concerns regarding the possible health risks associated with certain per- and polyfluoroalkyl substances (PFAS), the Governor's PFAS Working Group issued a report in 2020 outlining action steps that Connecticut should take in response. In

In addition, U.S. EPA, which had previously delayed moving forward with efforts to update standards for PFAS, has signaled its intent to begin the process of developing drinking water standards for PFAS. If Connecticut continues to pursue state actions to address PFAS, CWWA *recommends the following approach:*

- Utilize a comprehensive approach in addressing concerns regarding PFAS, including 1) preventing the introduction of PFAS in the environment; and 2) remediating areas that are contaminated with PFAS;
- Support the establishment of a Safe Drinking Water Advisory Council comprised of toxicologists, hydrologists, scientists, engineers, water utilities, economists, and other experts to provide guidance in the development of drinking water standards and action levels.
- Ensure that drinking water standards are developed using a scientifically defensible, risk-based, and data-driven process to ensure that standards are truly protective of the public health;
- Provide public water suppliers with clear, consistent guidance and reasonable compliance timeframes to address any PFAS contamination, which may require significant costs; and
- Support continued funding for the Public Water System Improvement Program to assist water companies in complying with new state and federal requirements regarding PFAS, similar to New Hampshire and Massachusetts.

In addition, EPA has initiated revisions to the Lead and Copper Rule which will require public water suppliers and other water systems, such as schools, to address concerns regarding lead levels in drinking water. On the state level, CWWA *supports the following recommendations:*

- Assist the state in addressing lead in drinking water by: 1) supporting efforts to encourage school systems to test and monitor for lead; 2) developing programs to assist consumers in identifying potential sources of lead in their homes, businesses, and institutional buildings and assist them in identifying how to mitigate those risks; 3) developing strategies and funding to encourage the replacement of customer lead service lines; and 4) developing public education and outreach materials concerning lead in drinking water, particularly schools.

WATER SUPPLY PLANNING & CLIMATE CHANGE CHALLENGES

In 2019, Connecticut adopted a comprehensive State Water Plan to guide decisions affecting Connecticut's water resources. In addition, the state has moved forward in completing the Water Utility Coordinating Committee (WUCC) process and the Governor's Council on Climate Change has developed recommendations to address the need for greater resiliency. CWWA *supports the following recommendations relative to these efforts:*

- Ensure implementation of the State Water Plan and the WUCC process

provides for the continued availability of high quality public water supplies, including 1) Supporting the use of interconnections to address water supply issues; 2) Stronger mechanisms for enforcing water use restrictions during drought and other water supply emergencies; and 3) Adequate protection of safe yield and margin of safety; and

- Support recommendations of the Governor's Council on Climate Change that address the need for greater resiliency to protect the quality and availability of public water supplies.

SOURCE WATER PROTECTION

Source water protection is critical to ensuring the safety and quality of Connecticut's public water supplies. Protecting source water from contamination can reduce treatment costs and risks to public health. *CWWA supports the following recommendations:*

- Continue to fund the state's Open Space & Watershed Acquisition program, which has been a successful tool in protecting watershed lands;
- Encourage Green Snow Pro training and certification to promote best management practices and reduce impacts of deicing chemicals on public water supply sources;
- Adopt legislation requiring the CT Siting Council to fully consider the impact on water quality and quantity with regard to the siting of solar installations and other renewable energy facilities on watershed lands; and
- Expand the state's efforts to address invasive species/plants.

COST AND OPERATIONAL ISSUES

As water companies strive to provide customers with safe, adequate public water supplies at a reasonable cost, they are challenged by the costs to comply with new state and federal laws and regulations which require significant investment. In addition, as essential workers, water utilities have faced new operational issues in responding to COVID-19. *CWWA supports the following recommendations:*

- To address concerns regarding the provision of alternative water supplies to customers during extended water supply disruptions, the state should: 1) utilize existing requirements included in the emergency plans water utilities serving more than 1,000 customers are required to submit to DPH for its approval, which include identifying alternative water supplies and how such supplies will be provided to customers; and 2) consider extending similar emergency plan requirements to smaller water utilities.
- Ensure that the state prioritizes compliance issues and provides water companies with greater flexibility and time to meet new requirements;
- Support continued funding for the Public Water System Improvement Program to assist water companies in replacing aging infrastructure and complying with new state and federal requirements regarding emerging contaminants, Manganese, and the replacement of lead service lines;
- Support the creation of a Connecticut Infrastructure Bank to leverage financing to fund infrastructure improvements, including projects related to water treatment plants,

distribution systems, and pumping stations;

- Authorize water companies to recover Construction Work in Progress (CWIP) for major improvements to water treatment systems; and
- Alleviate unnecessary costs and inconsistencies associated with state Department of Transportation road repair requirements, such as compaction testing.

SAFE DRINKING WATER FEE

To ensure that revenues generated under the Safe Drinking Water Fee are used judiciously to support staffing needed to preserve the primacy role of the state Department of Public Health (DPH), CWWA supports the following recommendations:

- To reduce water utility customer fees, the state should: 1) Identify other funding mechanisms to preserve DPH's federally designated drinking water primacy role; 2) Ensure that DPH continues to streamline regulatory processes to improve efficiencies and reduce costs; and 3) maintain the \$3.00 per service connection cap and sunset provisions; and
- Continue to encourage DPH to streamline various regulatory programs and requirements, including exempting routine/minor activities performed on water company lands from DPH's change of use permit.

WATER/ENERGY NEXUS

Water treatment and distribution systems are very energy intensive. As such, energy efficiency programs are critical to water utilities in controlling costs and customer rates as well as in promoting water

conservation. CWWA supports the following recommendations:

- Expand opportunities for water companies to reduce energy costs and improve energy efficiency, including increasing the cap on Virtual Net Metering (VNM) and making private and regional water utilities eligible to participate in VNM; and
- Ensure that the Public Utilities Regulatory Authority (PURA) ratemaking policies reflect investments and operating expenses needed to support increased energy efficiency at water utilities.

SMALL WATER SYSTEMS

Hundreds of small water systems, including condominium and homeowners' associations, mobile home parks, and convenience stores, fail to properly maintain water systems, creating public health and safety concerns for customers, DPH and local health agencies. CWWA supports the following recommendations:

- Streamline the approval processes for acquisitions of small systems by viable water companies; and
- Support revisions to Connecticut's Drinking Water State Revolving Fund to assist small systems in addressing infrastructure needs, including interconnections and regional solutions, to ensure that costs are not borne by customers of companies asked to acquire failing systems.

WORKFORCE DEVELOPMENT

Connecticut's water companies employ approximately 5,000 people throughout the state in a wide range of positions. However, there have been an unprecedented number



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of retirements in the industry and water companies are struggling to find qualified applicants. *CWWA supports the following recommendations:*

- Address barriers facing individuals in obtaining operator certification, including clarifying licensing reciprocity opportunities, and recognizing credit for work experience, including military experience; and
- Target federal funding available under the Governor's Innovative Workforce program to connect workers to in demand jobs to on-the-job training (work-based learning) for water treatment operators.

Questions? Please contact CWWA's Executive Director Betsy Gara at gara@gmlobbying.com or 860-841-7350.