Statewide Water Utility Coordinating Committee
Implementation Workgroup

Interconnections/Regionalization Sub-group

Discussion of workshopped modifications to existing regulations:

Sale of Excess Water Permits (CT DPH) and “Diversion General Permit” (CT DEEP)
What is an Interconnection?
An “interconnection” is any physical, hydraulic connection between two or more public water systems. Interconnections may be:

- **Emergency** or active
- Temporary or permanent

Emergency Interconnections:
Established in anticipation of an emergency event, allowing one PWS to supply another with water for a temporary duration. Emergency interconnections may also include raw or finished water interconnections to replenish surface water supplies in a drought.
Interconnections/Regionalization Sub-group

- February 2021: Discussion of impediments to emergency interconnections
- June 2021
- September 2021: Draft Roadmap + Identification of efficiencies to be gained in Diversion Permit and Sale of Excess Water Permit

Statewide WUCC Implementation Work Group

- February 2021: Draft Roadmap
- June 2021
- November 2021: Draft Diversion Permit reg. modifications discussed
- February 2022
Interconnection Roadmap
Reference material for use by:

- Smaller utilities
- Utilities exploring an interconnection
- Citizens/ratepayers
- WPCA board members
- Elected officials

What is an interconnection?

When?
- When is it prudent?

How?
- Agreements
- Financing
- Planning/Permitting

Emergency vs. active
- Deterrents

Interconnection Roadmap

What is an Interconnection?

When?

How?

Agreements

Financing

Planning/Permitting

What is an Interconnection?

An "interconnection" is any physical, hydraulic connection between two or more public water systems (PWSs).

When is it prudent?

Agreements

Financing

Planning/Permitting

Emergency vs. active

Deterrents

Purpose of interconnections

Interconnections are used/recognized because:
- "Emergency" and "active" vs. "everyday use".
- Emergency interconnections: Established in anticipation of an emergency event, allowing use PWSs to supply another.
- Emergency interconnections may also include out-of-service/active interconnections to replenish candidate water supplies during drought.

Active Interconnections: Established for use as an on-needed, non-emergency basis, daily or periodically, so that a PWS may augment supplies or fully supply another public water system's needs.

When is an Interconnection Prudent?

Emergency
- Excess supply is available.
- PWSs are contiguous.
- Transit time between the two PWSs is not significant.
- Access to the PWS is not problematic.

Active
- Excess supply is available.
- PWSs are contiguous.
- An interconnection will serve an objective or reliable water supply.
- An interconnection will improve system resilience to drought, climate change, and equipment failures.

Deterrents
Permitting

“Diversion General Permit” – CT DEEP

Sale of Excess Water Permit – CT DPH
Permitting

“Diversion General Permit” – CT DEEP

Required when a PWS withdraws water from a source or diverts water from one distribution system or service area to another, in excess of 50,000 gpd but less than 1 MGD. Otherwise, an "individual" would be needed.
Permitting

“Diversion General Permit” – CT DEEP

Regulatory modifications would add a new category to an existing "Filing Only" general permit ("GP") for verified emergency interconnections of less than 1 MGD, for no more than 30 days annually, provided transfer source is not "flow-impaired".

Benefits:
• Current interconnection GP requires prior written approval.
• As does current Emergency Authorization process.
• DEEP still has option to deny request if it determines GP requirements are not met.
• Daily transfer volumes confirmed by DEEP as per annual reporting required by GP.
Proposed modifications to *General Permit for Diversion of Water for Consumptive Use: Filing Categories*
(exp. 1/17/27)

Add to Section 3.a (Eligible Diversions):

(5) Emergency Interconnection and Transfer

Transfer of no greater than 1,000,000 gallons of water in any twenty-four hour period from one community water system’s distribution system or service area to another community water system’s distribution system or service area, not otherwise exempt pursuant to Section 22a-377(b)-1(a)(5) or 22a-377(b)-1(a)(6) of the Regulations of Connecticut State Agencies, provided (1) such transfer continues for no more than thirty (30) days, (2) such transfer is for occasional, intermittent use to provide for water supply replacement or supplementation under emergency conditions, during planned system maintenance, or other unexpected conditions that could affect system water availability, (3) the relevant water supply source(s) for the transfer is not included within the Department of Energy and Environmental Protection’s current Integrated Water Quality Report as a Nonpollutant Impairment caused by Flow Regime Modification, (4) there are no more than two general permit authorization co-requesters, and (5) such transfer does not result in an increase in the rate or quantity of withdrawal from the relevant water supply source(s) in excess of the rate or quantity registered with or permitted by the commissioner pursuant to sections 22a-368 or 22a-378a of the General Statutes.

Add to Section 2 (Definitions):

“Community water system” means a water system as defined in section 25-32-7a of the Regulations of Connecticut State Agencies.
Permitting

Sale of Excess Water Permit – CT DPH

When a PWS has reserves exceeding those required to maintain an abundant supply, it may sell excess water to another utility, with approval of a Sale of Excess Water Permit.
Permitting

Sale of Excess Water Permit – CT DPH

*Regulatory modifications would* create a "filing-only" category for emergency interconnections.

*Benefit:* This would be a more stream-lined process. It should be noted that emergency interconnections do not count against a utility's available water.