



CITY OF MERIDEN
DEPARTMENT OF PUBLIC UTILITIES

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Dennis Waz
Director of Public Utilities

February 8, 2019

Justin S. Milardo
Connecticut Department of Public Health
Drinking Water Section
410 Capitol Avenue, MS#12DWS
P.O. Box 340308
Hartford, CT 06134-0308

RE: Proposed Safe Drinking Water Primacy Assessment Language

Dear Mr. Milardo:

Thank you for the opportunity to comment on the proposed language implementing the Safe Drinking Water Primacy Assessment Fee.

Although we support efforts to ensure that the state Department of Public Drinking Water Section retains its EPA designated primacy relative to drinking water, we have concerns with certain aspects of the proposed language.

The proposed language unfairly shifts the burden for funding state agency staff onto water company customers. As drafted, the language fails to include any limitations on the maximum amount of revenues that can be generated by the fee or the amount that may be charged per customer each year. In addition, the language should include a sunset provision to ensure that water company customers are not responsible for funding state agency staff in perpetuity. The \$5 per service connection fee is much too high, allowing the department to almost double the fee.

Moreover, as proposed, the costs associated with maintaining the department's primacy are not equitably borne by all water systems. Instead, the proposed language allows Transient Non- Water Systems to pay what amounts to \$30 per year, far less than the Community Water Systems. This places a disproportionate burden for funding the department's staff on Community Water Systems and their customers.

Although the proposed language includes a reporting mechanism, greater transparency is warranted to ensure that the funds collected are truly needed to support the department's primacy role. In addition, the report should detail the department's efforts to improve efficiency and reduce unnecessary and burdensome regulatory requirements.

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Also, the proposed language continues to rely on service connections as the basis for the assessment. We agree with CWWA that "customer connection" is more appropriate because it is more closely tied to the billing system.

Thank you for the opportunity to comment on the proposed language.

Very truly yours,

A handwritten signature in cursive script that reads "Dennis Waz".

Dennis Waz

Director of Public Utilities