

From: [J.Cansler](#)
To: [DPH.Fee](#)
Subject: Comments - Safe Drinking Water Primacy Fee
Date: Thursday, February 7, 2019 2:17:36 PM

The Southeastern Connecticut Water Authority (SCWA) has reviewed the proposed Safe Drinking Water Primacy Assessment language that was made available for public comment, and is concerned about the following:

1. **Proposed Cap Too High** - The proposed \$5 per service connection fee cap is too high, giving the department free rein to double the fee from what has been charged in year one. There is no longer a cap on the total dollars authorized under the fee or any certainty regarding what percentage of the Department's staff are being funded through this user fee. If any future increases are needed to support staffing to preserve the department's primacy role, the legislature should make this determination based on state and federal funding and staffing needs.
2. **There Needs to Be Limits on the Fee** - To avoid unfairly burdening SCWA customers, there must be specific limits related to the maximum amount being funded through the fee, the amount per service connection, the percentage of the program funded with these fees, and the percentage that it may increase in any given year.
3. **Fee Should be Sunsetting** - There should be a mechanism to 'sunset' the fee or require that the legislature specifically reauthorize it after a long period of time, so that it does not permanently shift the burden of the program costs to SCWA customers.
4. **The Fee is not Equitable for all Systems** - As proposed, Non-Transient systems will only have to pay \$150 every 5 years, even though the Drinking Water Section acknowledges that they spend significant time and resources in regulating these small systems. To minimize the administrative burden on the Department we can support extending the duration between billings, but, the fee for Non-Transient systems should be significantly increased to ensure that the fee is equitable for all water customers.
5. **Basis for Assessment is not tied to Billing** - For community water systems, the language continues to use "service connections" to determine the basis for the assessment. However, it is more appropriate to use "customer connection" as the basis, explicitly exempting fire services. This language better ties the assessment to the billing system and will provide consistency for SCWA and our customers.
6. **Greater Focus on Accountability & Efficiency** - DPH should be required to account for how the Safe Drinking Water Primacy Assessment fees are used and steps taken to adopt more efficient regulatory processes to avoid significant cost burdens for water customers. The report should be subject to some form of public hearing or review by the legislature. The report provided for in Section 2 (j) should include information on:
 - a. the resources, tasks and costs incurred to support primacy
 - b. the portion of the budget which is already funded from other state or federal sources
 - c. the portion of the time the department spends in regulating water systems by type, and
 - d. efforts to streamline permitting and other regulatory approval processes

Thank you,

Joseph "Josh" Cansler - General Manager
SCWA (Southeastern Connecticut Water Authority)
Phone: (860) 464-0232
Email: j.cansler@waterauthority.org