



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)



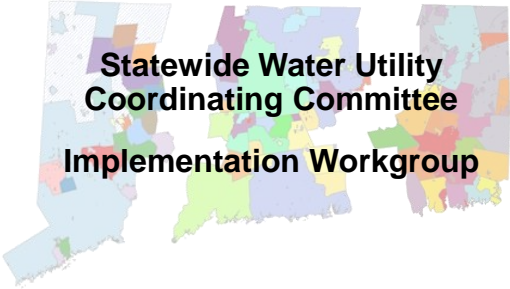
What is an Interconnection?

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

Statewide WUCC
Implementation Work
Group

Discussion of impediments to
emergency interconnections

Draft Roadmap
+
Identification of efficiencies to
be gained in Diversion Permit
and Sale of Excess Water
Permit

February
2021

June
2021

September
2021

February
2021

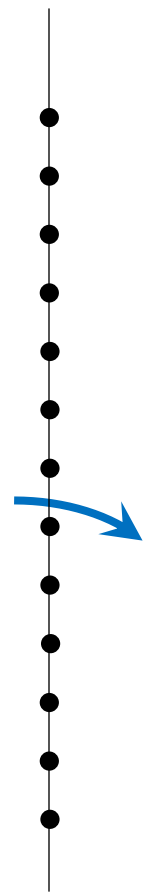
June
2021

November
2021

February
2022

Draft Roadmap
+
Discussion of possible reg.
modifications

Draft Diversion Permit reg.
modifications discussed

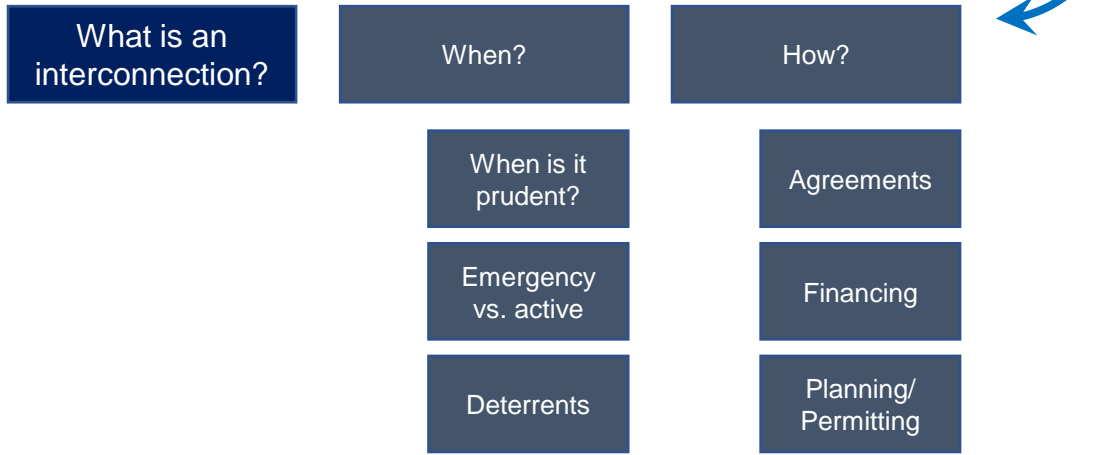




Interconnection Roadmap

Reference material for use by:

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



11/16/21 Water Utility Coordinating Committee Implementation Workgroup

Interconnection Roadmap

What is an Interconnection?
 An "interconnection" is any physical, hydraulic connection between two or more public water systems (PWSs). Interconnections may be:

- Emergency or active
- Temporary or permanent
- Unidirectional or bidirectional

Purposes of Interconnections
 Interconnections are commonly distinguished between "Emergency" and "Active" or every-day use.
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.
Active Interconnections: Established for use on an as-needed, non-emergency basis, daily or periodically, so that a PWS may routinely supplement or fully supply another public water system's water.

When is an Interconnection Prudent?

Emergency	Active
<ul style="list-style-type: none"> • Excess supply is available. • PWSs are proximate. • Potential for durational water quantity issues exist with one or both PWSs. • Temporary disruptions are planned for one or both PWSs. • An interconnection will improve system resilience to drought, climate change, and equipment failure. 	<ul style="list-style-type: none"> • Excess supply is available. • PWSs are proximate. • An interconnection will ensure an adequate or reliable water supply. • Finished water quality of the donor PWS is compatible to the receiving PWS. • An interconnection will improve system resilience to drought, climate change, and equipment failure.

Emergency interconnections are not considered "available water" for water supply planning purposes and do not require a Diversion Permit from the Connecticut Department of Energy and Environmental Protection (CT DEEP) if only operated for firefighting or during a State-declared public water supply emergency. The Connecticut Department of Public Health (CT DPH) requires a Sale of Excess Water Permit for emergency interconnections.
 Water supplied by an active interconnection with a purchased water agreement may be considered available water by the purchaser. The seller must include the full, contracted amount as a demand (or reduction in supply) in its water supply planning.
 Active interconnections require a Sale of Excess Water Permit from CT DPH. If the interconnection is between distribution systems or service areas and operated at a maximum day of more than 50,000 gallons per day (gpd), a diversion permit from CT DEEP is required.



Statewide Water Utility
Coordinating Committee

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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):

DRAFT

(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.