



April 25, 2019

Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

SUBJECT: DOCKET 19-04-02, APPLICATION OF SJW GROUP AND CONNECTICUT WATER SERVICE, INC. FOR APPROVAL OF CHANGE OF CONTROL

Dear Mr. Gaudiosi:

The Alliance for Water Efficiency (AWE) is a stakeholder-based nonprofit organization dedicated to the efficient and sustainable use of water. Headquartered in Chicago, the Alliance serves as a North American advocate for water-efficient products and programs, and provides information and assistance on water conservation efforts.

AWE partners with our members and other organizations to produce the research, tools, resources, and information they need to advance water efficiency in their communities. Our work has helped water professionals seize new opportunities, uncover challenges, and break down barriers to achieve sustainable water use.

We are pleased that SJW and Connecticut Water have made a commitment in their pending merger application to fund water conservation initiatives with a \$50,000 grant to AWE to provide technical assistance services to the Water Planning Council to support water conservation programs identified in the State Water Plan. I am familiar with the water conservation efforts in Connecticut, having worked in Connecticut in past years and more recently presented before the Water Planning Council and participated in the CT Section AWWA Sustainability Committee. I have seen first-hand the enthusiasm for water conservation measures in Connecticut as well as some of the barriers to advancing those efforts. The grant could help move those important water conservation initiatives forward to help preserve Connecticut's water resources and provide benefits for water customers and the residents of the state.

The State Water Plan identifies a number of initiatives related to water conservation, and this project grant could assist in setting priorities and providing additional research or models to help drive the implementation of those conservation measures. While it would be up to the Water Planning Council to determine how to use the grant funds, I could see that AWE could assist in any of the following areas:

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1. **Provide an evaluation of existing state laws and regulations.** AWE has conducted a detailed analysis of water efficiency and conservation laws and regulations that exist in all 50 states, and published its findings in a [State Scorecard](#). This work could inform the development of additional laws and regulations in Connecticut should the Water Planning Council be interested in firming up statewide policies on water conservation. This work could highlight potential policies would align with the State Water Plan goals. One example of this would be legislation requiring the that all plumbing fixtures installed or sold in the state be at the volumes specified in the US EPA WaterSense program, rather than at the national standard which Connecticut itself adopted back in 1989. Four other states have already adopted this requirement.
2. **Analyze the options for water waste enforcement.** Local enforcement of water conservation ordinances is both a hurdle to overcome and an opportunity to be creative. AWE could review the 'model' ordinance promoted by the state relative to some that have successfully been adopted in other states to help refine the 'model' and make it more practical. AWE could also explore other ways to achieve enforcement, including whether there could be legislation that would apply to all towns unless they choose to adopt local ordinances that would do otherwise. An issue to address would be if these provisions would apply only to those served by public water supply systems or all residents, even if supplied by domestic wells.
3. **Review the revenue loss issues arising from conservation programs and recommend solutions for addressing this problem.** As part of its [Financing Sustainable Water Program](#), AWE has developed a rates handbook and rate model specifically to address the revenue stability issue. We can also evaluate the feasibility of having all water systems adopt revenue adjustment mechanisms or conservation surcharges to help stabilize revenue and remove the barriers to consumer conservation.
4. **Review and evaluate specific areas in the State Water Plan and provide recommendations.** AWE could provide some perspective on the following:
 - Section 5.2.3.3 – Water Conservation. Policy Recommendation (1) on Water conservation education outreach. AWE could provide specific recommendations here on what has worked successfully. This could include general public information initiatives or compiling info for state agencies and water providers to share with customers, including promoting the AWE Home Water Works water conservation calculator.
 - Section 5.2.3.3 – Water Conservation. Policy Recommendation (4) on Passive conservation savings. AWE has done extensive research in this area and can provide information on passive savings that likely have already occurred in the state.

- Section 5.2.3.3 – Water Conservation. Policy Recommendation (6) on Incentives for outdoor water conservation measures. In February of 2019, AWE released a study that examined outdoor landscape program measures and evaluated the success and savings from these programs. In addition, AWE is assembling a database of national programs on outdoor water conservation incentives.
- Section 5.2.3.3 – Water Conservation. Policy Recommendation (7) on Construction standards. AWE has reviewed a number of local ordinances, and AWE is also involved in codes development on a national basis. We can provide meaningful input in this area.
- Section 5.2.3.3 – Water Conservation. Policy Recommendation (8) on Evaluation of barriers to green building and infrastructure. There are financial barriers to debt financing green infrastructure at the utility level, and AWE can provide guidance on how to overcome that.
- Section 5.2.3.3 – Water Conservation. Policy Recommendation (9) on Working with the Green Industry. Having successfully worked with a number of irrigation industry partners, AWE is in a good position to provide guidance on this topic. We could also work with those stakeholders on irrigation practices and reducing outdoor water use in general.

We would be pleased to work with Connecticut stakeholders on these water conservation issues, should this project grant be approved. If you would like any additional information, please let me know.

Sincerely yours,



Mary Ann Dickinson
President and CEO