

COLORADO WATER UTILITY COUNCIL
Rocky Mountain Section of the American Water Works Association

MINUTES
COLORADO WATER UTILITY COUNCIL MONTHLY MEETING

October 1, 2010 10:00 a.m.

Denver Water

1600 W. 12th Avenue
Three Stones Building

Remarks from the chair—Tom Mountfort

- There was a good turnout for the meeting in Breckenridge.

CDPHE—Ron Falco

- The Division will send out a needs survey next year. It is crucial to get accurate information on capital improvement plans. All capital improvements that are planned should be included, not just revolving funds improvements. The state of CO has a high success rate for projects that have been submitted in previous years. Dollars that result from the survey benefits all of us and include help with training and rad. Tyson Engels may come to our November meeting to discuss the survey.
- In several of the CWUC meetings, we have mentioned that we would like to have more opportunities to discuss issues with the Water Quality Control Commission. Recently, Ron and Paul Frohardt discussed setting up a work session with the Water Quality Control Commission to provide a briefing of what's happening in safe drinking water program. Perhaps the CWUC can provide a briefing of Council issues during the same work session. Paul is looking into the Commission's schedule. The periodic work sessions may begin close to the start of 2011.
- State budget—There may be a 1-2% cut in general funding across the state, as well as furloughs in 2011. The drinking water program has been successful in holding on to general funding up to this point.
- Recently, there was a meeting at Denver Metro on fees. It was a good discussion and

provided valuable information to the Division. Steve Gunderson said the issue of fees will be in a holding pattern until after the election.

Nutrient Criteria (NC)—Mary Fabisiak

- The September NC meeting
The Division gave a presentation on treatment technologies, performance, and potential costs to wastewater. The Colorado Nutrient Coalition presented their alternative criteria proposal.
- The Nutrient Coalition proposal
This proposal suggests there is no need for N limits, and some of suggested standards for lakes/reservoirs are based on acreage and elevation. Additionally proposed is a chlorophyll range of 20-35 ug/L for lakes/reservoirs that exceed 10 acres and are at an elevation of 1650 meters. This a higher level of chlorophyll than most reservoirs are at currently.
- The Oct 13th NC meeting
The Division is scheduled to provide a **3 hour** update to their nutrient criteria proposal. There will also be an update on the high quality water study that was performed in May through September of this year. An hour is scheduled for discussion of the alternative criteria proposal from the Colorado Nutrient Coalition.
- The RMSAWWA has received a request for a contribution to the efforts of the Colorado Nutrient Coalition. This generated good discussion with varying ideas and opinions.

This discussion also spurred three motions:

- “for the CWUC to not ask for funding from RMSAWWA to support the Coalition”
The motion passed; Fort Collins, Aurora, Boulder, and Golden abstained.
- “the CWUC shall seek party status for the NC Commission hearing” The motion passed; Aurora abstained.
- “for the Colorado Water Utility Council to provide it’s position on nutrient criteria for the protection of water supply and public health at the NC Commission hearing”.
The motion was passed with 5 abstains: Fort Collins, Golden, Boulder, Colorado Springs, and Aurora.

The CWUC NC subcommittee will develop this position. The position most likely will be based on a compilation of AWWA’s position on protecting drinking water sources. The CWUC may ask for RMSAWWA to support this NC position. The NC subcommittee will also develop a scope of work to request Section funding for a consultant to aid in preparing for the hearing.

Amendments 60 & 61, Proposition 101

- A joint resolution (between RMSAWWA and the CWUC) in opposition to Amendments 60 & 61 and Proposition 101 was developed and is provided as Attachment A. A motion was made “to accept the resolution as it stands”. The motion passed; Fort Collins abstained.

Policy 1—Jim Miller

- A draft of Policy 1 can be found at <http://www.cdphe.state.co.us/wq/bulletin/bulletin.html>
- This policy sets out the directions for using policies involved with regulatory implementation, and establishes the framework for developing and implementing such policies. Please provide written comments by October 15, 2010 via email to comments.wqcd@state.co.us with the subject line "Policy 1 Comments."
- A motion was made “to provide comments to the Division regarding Policy 1”. The motion passed. Two issues the comments may include are 1) whether or not Memorandums of Agreement and Memorandums of Understanding will be considered and implemented as policies; and 2) the benefits of having a list of which policies are in development.

Revised Total Coliform Rule

- Do we want to comment as a group on the proposed revision? Some of us have no major concerns. The Division will comment and will ensure their comments are sent out to CWUC members. The consensus was that CWUC members will comment individually.

Water Conservation Committee—Alyssa

- A CO Waterwise brochure was handed out (see Attachment B).
- The Summary Guide of Best Practices is now available.
- There are three irrigation training courses in November (see Attachment C).

Wastewater, July meeting--Al

- The Whole Effluent Toxicity regulations that were recently issued by the Division were discussed.

- Minutes from this wastewater meeting are posted at <http://cwwuc.org/>.

Water Quality and Policy Committee—Jim Miller

- Revisions to the floodplain regulations
 - Denver water commented on the proposed changes to (see Attachment D).
 - A motion was made “for the CWUC to seek party status for the hearing on the regulation”. The motion passed; Thornton opposed the motion while Broomfield and Fort Collins abstained.
- Revised Impoundment Regulation

The regulation is on hold while Solid Waste makes further revisions. As a Council, we are supportive of having the least cost (to utilities) programmatic approach (the Division or Solid Waste) for the appropriate requisite standard.

Water Quality Forum (WQF)--Jim McCarthy

- from the Sept 20th meeting

This past July, EPA published their intention to make limited revisions to their water quality control standards regulation. In support of that, two listening sessions were held in August. Audio and written transcripts from the August listening sessions can be found at http://water.epa.gov/lawsregs/lawsguidance/wqs_listening.cfm#summary. EPA plans for the proposed revisions to be published in the Federal Register during the summer of 2011.
- The next meeting of the Forum’s E. coli committee is on Oct 26th, 9:30 at UDFCD.

A representative from Tetra Tech will give a presentation on incorporating E. coli TMDLs into stormwater permits.
- Overviews and presentations of recent WQF meetings can be found at <http://www.cwqf.org/>.

Membership committee report--Greg Moore

- Send updates to Greg. The updated directory...made it out to all before these minutes!

Open Discussion

- With the possible passage of the Amendments and Proposition (see p. 2), the Division developed a schedule of fees that is *for discussion purposes only* (Attachment E). If this happens, the CWUC would like to work with the Division to secure funds to maintain primacy. Ideas to do this are to develop a fee structure that is closer to the cost for services. Attachment F includes some suggestions for how to do this.

Next Meeting

- The next meeting will be on November 5th, same time/place.

Attachment A

Statement of Resolution In opposition to Amendments 60, and 61 and Proposition 101

The Rocky Mountain Section of the American Water Works Association (RMSAWWA) and Colorado Water Utility Council (CWUC) are dedicated to the promotion of public health and welfare in the provision of safe and sufficient water for all. RMSAWWA and CWUC strive to be the pre-eminent resource for education, training, information, and research for all facets of the water industry; in the Rocky Mountain region (Colorado, New Mexico and Wyoming).

Three measures appearing on the November statewide ballot would significantly damage Colorado's state and local governments including water and wastewater utilities. The funding mechanisms of the most basic level of water and wastewater services would be disrupted and are at risk. The trio of measures would slash at least \$1 billion annually in state taxes, roll back half of all school property taxes statewide and drastically limit government's ability to construct new buildings and perform capital improvements.

The overall effect of *Proposition 101* is to limit local and state revenue by means of reducing specific ownership and sales taxes. Local governments providing water and wastewater services supported by sales taxes will have service and revenue impacts.

One of the many components of *Amendment 60* overturns hundreds of elections approved by local voters in the past eighteen years requiring municipal service providers such as water and wastewater utilities to pay property taxes which will force increased utility bills. Municipal utilities have facilities and properties that are necessary for the services we provide and the property tax burden on these properties will be significant and passed on to rate payers.

One of the many components of *Amendment 61* eliminates any practical means for state and regional governments including water and waste water utilities to make capital improvements to their facilities and infrastructure and plan for the future through the issuance of long term bonds.

The cumulative and destructive nature of these measures ensures that Colorado will surrender its competitive standing to attract large and small employers alike, resulting in little to no economic growth for the state, and a certain increase in utility bills for the many services water and waste water utilities provide.

The RMSAWWA and CWUC do hereby oppose the three ballot measures known as Proposition 101, Amendment 60 and Amendment 61 and urge the defeat of these measure at the November 2, 2010 General Election.

Attachment A

Signed _____ Date _____
Kevin Bergschneider, Chair of the Rocky Mountain Section of AWWA

Membership Levels and Benefits

Membership levels	Membership fee	Number of people from the organization allowed on membership	WaterWise newsletter & archives	Special recognition in the newsletter	Discounted registration at Colorado WaterWise events and Pro Green Expo
Platinum: Large utilities, private industry or government	\$3,000	10	X	X	X
Gold: Medium to large utilities, private industry or government	\$1,500	5	X	X	X
Silver: Medium utilities, private industry or government	\$1,000	4	X	X	X
Bronze: Medium to small utilities, private industry, or government	\$750	1	X		X
Sponsor: Small utilities, private industry, or government	\$325	1	X		X
Patron: Non-profit organizations	\$100	1	X		X
Individual: individuals	\$50	1	X		X

Sign up for the quarterly newsletter at www.coloradowaterwise.org

Attachment B About Us

Colorado WaterWise is a non-profit organization whose mission is to promote and facilitate the efficient use of Colorado's water.



Our History

Colorado WaterWise became the face of water conservation in 2000. Colorado WaterWise was created by combining Metro Water Conservation, Inc. and Xeriscape Colorado, two non-profits formed in the mid-1980s to promote water wise practices among homeowners, businesses, and water providers.

This organization provides support to water professionals, water providers, and communities across Colorado empowering them to offer more responsive and effective programs to their own customers, clients, and citizens.

Contact Us

info@coloradowaterwise.org
PO Box 40202
Denver, CO 80204-0202
www.coloradowaterwise.org

colorado waterwise



The voice of the Colorado
water conservation community

www.coloradowaterwise.org

Programs

Best Practices Project: Through a grant from the Colorado Water Conservation Board, Colorado WaterWise has developed the *Guidebook of Best Practices for Municipal Water Conservation in Colorado*. The Guidebook helps water professionals select the most sensible and cost-effective programs for implementation. In addition, the Guidebook provides:

- 💧 A summary of customer-side and utility-side indoor and outdoor best practices.
- 💧 Provides a summary of utility-side best practices for water management.
- 💧 Detailed information for each best practice, including implementation approach and methods, likely costs, anticipated water savings, and barriers and challenges.
- 💧 Guidance on prioritizing and selecting water conservation program tools and measures.
- 💧 A resource guide for anyone seeking water conservation information, assistance, and financing in Colorado.



Xeriscape™ Colorado: Xeriscape promotes creative approaches to water conserving landscapes by helping people improve their landscapes and to reduce the need for water, maintenance and other resources. The program provides centralized resources and information as well as many seminars and classes throughout the state.

Outreach Program: In partnership with the Colorado Water Conservation Board and local water providers, Colorado WaterWise organizes statewide workshops to provide education on water conservation best management practices, by offering an interactive forum to share success stories and learn about planning tools, resources and existing programs. Colorado WaterWise has also authored a number of publications on Xeriscape and other water efficiency topics.

Colorado WaterWise Annual Water Conservation Workshop: Colorado WaterWise holds an annual event for water supply planners, environmental professionals, conservation professionals, elected officials, city planners, educators, green industry professionals, and green builders and developers to learn more about water efficiency topics and programs in Colorado.



Become a Member

If you are...

- A water professional
- green industry professional
- Concerned about the future of water resources in Colorado
- Interested in the promotion of water conservation in Colorado

You'll want to be a member of Colorado WaterWise

Benefits of Membership

Colorado WaterWise provides ...

- 💧 a forum for information exchange
- 💧 networking opportunities
- 💧 access to technical expertise
- 💧 leveraging of funds and technical assistance through collaborative work
- 💧 training opportunities
- 💧 access to resources and publications
- 💧 an electronic newsletter
- 💧 member discounts to events



IRRIGATION ASSOCIATION TRAINING COURSES

NOVEMBER 8-9, 2010



COURSE DESCRIPTIONS

Predicting & Estimating Landscape Water Use
(Nov. 8, 8 a.m. – 12 p.m.)

Intermediate | Landscape & Golf (4 CEUs)
Plan and budget watering needs by combining local weather data with site-specific planting and soil information. This half-day session uses hands-on work and case studies to teach how to calculate daily, monthly and annual system water use and cost at any project stage.

Member \$120
Nonmember \$145

Sprinkler System Scheduling
(Nov. 8, 1 p.m. – 5 p.m.)

Beginner | Landscape (4 CEUs)
Learn how to set up a watering schedule using irrigation controllers on automatic systems. This half-day session for landscapers, irrigators and grounds maintenance personnel teaches simple, accurate scheduling techniques. Topics include evapotranspiration rates, root zones, soil types and precipitation rates.

Member \$120
Nonmember \$145

Smart Technologies for Irrigation Management
(Nov. 9, 8 a.m. - 5 p.m.)

Intermediate | Landscape (8 CEUs)
Learn and understand how to manage smart technologies for improved performance and function that achieves increased irrigation efficiencies. This full-day session covers weather- and soil moisture-based controllers and instruction on how to manage the controllers for best performance.

Member \$195
Nonmember \$225

TO REGISTER OR FOR MORE INFORMATION VISIT WWW.IRRIGATION.ORG

Need Certification Too?

All IA certification exams are available at local testing center.



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DENVER WATER

1600 West 12th Avenue • Denver, Colorado 80204-3412
Phone 303-628-6000 • Fax No. 303-628-6199 • denverwater.org

September 27, 2010

Mr. Tom Browning
Advisory Committee
Colorado Water Conservation Board
1313 Sherman St., Room 721
Denver, CO 80203

Re: July 15, 2010 Draft of Rules and Regulations for Regulatory Floodplains in Colorado

Dear Mr. Browning:

Denver Water is writing to submit comments on the July 15, 2010 Draft of Rules and Regulations for Regulatory Floodplains in Colorado ("Draft Regulations"). Denver Water appreciates the time and effort that you, the Colorado Water Conservation Board ("CWCB") staff, and Advisory Committee have taken in preparing the Draft Regulations, and would like to thank you for the opportunity to submit additional comments.

As you know, Denver Water is the largest water utility in the State of Colorado, serving water to over 1.3 million customers. As the largest water utility in the State, Denver Water owns land, structures and facilities, some of which are unavoidably located in 100 year and 500 year floodplains. The location of its structures and facilities in floodplains is an inherent necessity of the collection and treatment of raw water, and distribution of potable drinking water. The current value of these structures and facilities is in the billions of dollars. Although the cost impact of the Draft Regulations to Denver Water are unknown at this time largely because of the uncertainty of how the many local jurisdictions Denver Water is subject to will act on the CWCB recommendations and how inter-related agency implementation will occur, there will most certainly be a cost impact.

Given the necessity of locating water collection, treatment, and distribution facilities in floodplains, Denver Water believes an exemption is necessary. In many cases, Denver Water has no choice but to locate its structures and facilities in 100 and 500 year floodplains. Many of these structures and facilities have existed in these locations for nearly 100 years. If Denver Water were required to retrofit some of these structures and facilities to comply with the International Building Code ("IBC") and Flood Restraint Design and Construction (ASCE 24) standards ("ASCE 24") as a result of having made "substantial changes" or "new additions" to its facilities, Denver Water would have to ask its rate payers to bear the potentially extraordinary cost of the upgrades. Given the risk posed to these structures and facilities in comparison to the cost or their remaining useful life, it would be difficult for Denver Water to ask its ratepayers to justify such substantial expenditures to comply with the IBC and ASCE24.

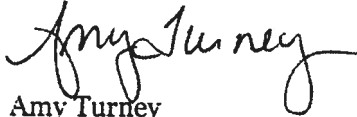
Attachment D

Mr. Tom Browning
September 27, 2010

For these reasons, Denver Water urges the Advisory Committee to adopt an exemption for raw water collection, treatment, and potable water distribution structures and facilities, exempting such structures and facilities from subsection 6A(1). If granted such an exemption, Denver Water would continue to comply with the spirit of the IBC and the ASCE24-05 when constructing new structures or making upgrades, but Denver Water requires the assurance that its existing structures and facilities will not be strictly required to comply as there may be cases where the cost of compliance far exceeds the cost of upgrading the facilities. As discussed further below, Denver Water also requests that the definition of "Critical Facilities" be revised to more specifically refer to "Critical Structures." In addition, a more specific definition of the term "substantial changes" should be incorporated into the Draft Regulations and the term "new additions" should be removed as it is unclear and duplicative of the term "substantial changes."

Attached to this letter, please find a copy of additional comments and revisions on the Draft Regulations. Denver Water's requested changes are depicted in bold green font along with the Advisory Committee's most recent changes, which are depicted in red font. An explanation for certain changes is noted by the footnotes. If you have any questions or would like to discuss these changes, please do not hesitate to contact me to arrange a meeting.

Sincerely,



Amy Turney
Denver Water

Attachment E

FOR DISCUSSION PURPOSES ONLY - SEPTEMBER 2010 Drinking Water Fees

		<u>10-11 Fees</u>	<u>New FTE Only</u>	<u>New FTE and Loss of GF</u>
<u>Category 01</u>	<u>Community Surface Water Treatment Systems</u>			
Subcategory 1	Population from 25-250	\$ 75	\$ 162	\$ 363
Subcategory 2	Population from 251-500	\$ 100	\$ 217	\$ 484
Subcategory 3	Population from 501-1,000	\$ 310	\$ 672	\$ 1,499
Subcategory 4	Population from 1,001-3,300	\$ 465	\$ 1,007	\$ 2,249
Subcategory 5	Population from 3,301-10,000	\$ 865	\$ 1,874	\$ 4,183
Subcategory 6	Population from 10,001-30,000	\$ 1,850	\$ 4,008	\$ 8,946
Subcategory 7	Population from 30,001-100,000	\$ 4,940	\$ 10,703	\$ 23,889
Subcategory 8	Population from 100,001-200,000	\$ 9,270	\$ 20,084	\$ 44,829
Subcategory 9	Population from 200,001-500,000	\$ 15,450	\$ 33,474	\$ 74,715
Subcategory 10	Population greater than 500,000	\$ 21,630	\$ 46,864	\$ 104,601
<u>Category 02</u>	<u>Community Ground Water Treatment Systems</u>			
Subcategory 1	Population from 25-250	\$ 75	\$ 162	\$ 363
Subcategory 2	Population from 251-500	\$ 100	\$ 217	\$ 484
Subcategory 3	Population from 501-1,000	\$ 220	\$ 477	\$ 1,064
Subcategory 4	Population from 1,001-3,300	\$ 310	\$ 672	\$ 1,499
Subcategory 5	Population from 3,301-10,000	\$ 680	\$ 1,473	\$ 3,288
Subcategory 6	Population from 10,001-30,000	\$ 1,545	\$ 3,347	\$ 7,471
Subcategory 7	Population greater than 30,001	\$ 4,450	\$ 9,641	\$ 21,520
<u>Category 03</u>	<u>Community Purchased Surface Water or Ground Water Treatment Systems</u>			
Subcategory 1	Population from 25-250	\$ 75	\$ 162	\$ 363
Subcategory 2	Population from 251-500	\$ 100	\$ 217	\$ 484
Subcategory 3	Population from 501-1,000	\$ 155	\$ 336	\$ 750
Subcategory 4	Population from 1,001-3,300	\$ 250	\$ 542	\$ 1,209
Subcategory 5	Population from 3,301-10,000	\$ 490	\$ 1,062	\$ 2,370
Subcategory 6	Population from 10,001-30,000	\$ 865	\$ 1,874	\$ 4,183
Subcategory 7	Population greater than 30,001	\$ 2,470	\$ 5,352	\$ 11,945
<u>Category 04</u>	<u>Non-transient, Non-community Surface Water Treatment Systems</u>			
Subcategory 1	Population from 25-250	\$ 75	\$ 162	\$ 363
Subcategory 2	Population from 251-500	\$ 100	\$ 217	\$ 484
Subcategory 3	Population from 501-1,000	\$ 280	\$ 607	\$ 1,354
Subcategory 4	Population from 1,001-3,300	\$ 400	\$ 867	\$ 1,934
Subcategory 5	Population from 3,301-10,000	\$ 620	\$ 1,343	\$ 2,998
Subcategory 6	Population from 10,001-30,000	\$ 1,670	\$ 3,618	\$ 8,076
Subcategory 7	Population greater than 30,001	\$ 4,450	\$ 9,641	\$ 21,520
<u>Category 05</u>	<u>Non-transient, Non-community Ground Water Treatment Systems</u>			
Subcategory 1	Population from 25-250	\$ 75	\$ 162	\$ 363
Subcategory 2	Population from 251-500	\$ 100	\$ 217	\$ 484
Subcategory 3	Population from 501-1,000	\$ 155	\$ 336	\$ 750
Subcategory 4	Population from 1,001-3,300	\$ 245	\$ 531	\$ 1,185
Subcategory 5	Population from 3,301-10,000	\$ 495	\$ 1,072	\$ 2,394
Subcategory 6	Population from 10,001-30,000	\$ 1,360	\$ 2,947	\$ 6,577
Subcategory 7	Population greater than 30,001	\$ 3,650	\$ 7,908	\$ 17,651

Attachment E

Drinking Water Fees

		10-11 Fees	New FTE Only	New FTE and Loss of GF
Category 06	<u>Non-transient, Non-community Purchased Surface Water or Ground Water Treatment Systems</u>			
Subcategory 1	Population from 25-250	\$ 75	\$ 162	\$ 363
Subcategory 2	Population from 251-500	\$ 100	\$ 217	\$ 484
Subcategory 3	Population from 501-1,000	\$ 125	\$ 271	\$ 604
Subcategory 4	Population from 1,001-3,300	\$ 185	\$ 401	\$ 895
Subcategory 5	Population from 3,301-10,000	\$ 325	\$ 704	\$ 1,572
Subcategory 6	Population from 10,001-30,000	\$ 805	\$ 1,744	\$ 3,893
Subcategory 7	Population greater than 30,001	\$ 1,980	\$ 4,290	\$ 9,575
Category 07	<u>Transient, Non-community Surface Water Treatment Systems</u>			
Subcategory 1	Population from 25-250	\$ 75	\$ 162	\$ 363
Subcategory 2	Population from 251-500	\$ 100	\$ 217	\$ 484
Subcategory 3	Population from 501-1,000	\$ 245	\$ 531	\$ 1,185
Subcategory 4	Population from 1,001-3,300	\$ 310	\$ 672	\$ 1,499
Subcategory 5	Population from 3,301-10,000	\$ 555	\$ 1,202	\$ 2,684
Subcategory 6	Population from 10,001-30,000	\$ 620	\$ 1,343	\$ 2,998
Subcategory 7	Population greater than 30,001	\$ 3,960	\$ 8,580	\$ 19,150
Category 08	<u>Transient, Non-community Ground Water Treatment Systems</u>			
Subcategory 1	Population from 25-250	\$ 75	\$ 162	\$ 363
Subcategory 2	Population from 251-500	\$ 100	\$ 217	\$ 484
Subcategory 3	Population from 501-1,000	\$ 125	\$ 271	\$ 604
Subcategory 4	Population from 1,001-3,300	\$ 185	\$ 401	\$ 895
Subcategory 5	Population from 3,301-10,000	\$ 495	\$ 1,072	\$ 2,394
Subcategory 6	Population from 10,001-30,000	\$ 535	\$ 1,159	\$ 2,587
Subcategory 7	Population greater than 30,001	\$ 2,970	\$ 6,435	\$ 14,363
Category 09	<u>Transient, Non-community Purchased Surface Water or Ground Water Treatment Systems</u>			
Subcategory 1	Population from 25-250	\$ 75	\$ 162	\$ 363
Subcategory 2	Population from 251-500	\$ 100	\$ 217	\$ 484
Subcategory 3	Population from 501-1,000	\$ 110	\$ 238	\$ 532
Subcategory 4	Population from 1,001-3,300	\$ 125	\$ 271	\$ 604
Subcategory 5	Population from 3,301-10,000	\$ 310	\$ 672	\$ 1,499
Subcategory 6	Population from 10,001-30,000	\$ 435	\$ 942	\$ 2,104
Subcategory 7	Population greater than 30,001	\$ 1,490	\$ 3,228	\$ 7,205

October 1, 2010

Goal: Maintaining Primacy

CML's Policy: Urges the state to avoid or exercise restraint in relying on fees, charges and other cash funding of programs that affect municipalities, especially in the areas of technical assistance, in programs where municipal participation is mandated by state law, and in regulatory programs that affect municipalities.

However, understanding there is the possibility (or likelihood) of losing General funding an approach through the development of a fair and equitable Drinking Water Fee Structure (one utility should not subsidize another utility) could be supported. Support for fee increases would require the development of fees that are based on cost of service. To develop cost of service actual cost would be broken down into cost centers such as:

- Permit Renewal
- Compliance inspections
- Compliance / data review
- Compliance assistance
- Data Management
- Emergency response
- Violation response
- Rule / implementation guidance (this varies based on what is promulgated, but possibly could develop an average or establish a method to adjust every year (should not have to go to legislature to update).

Factors within each cost center:

- Number of treatment plants
- Number and type of sources
- Consecutive system
- Population served with a breakdown that reflects actual cost of service
- _____

Design Review could be a stand alone fee structure based on an application fee and then an hourly rate; just like the air program

A final note is needed on the irony of utilities supporting a fee increase that adds positions when we are all having challenges keeping our staff and many of us have lost staff.

Where do We Go From Here?

Establish a subcommittee to work with the State to develop an equitable, cost of service fee structure that accounts for all segments of the drinking water programs.