



**ASSOCIATION OF
METROPOLITAN
WATER AGENCIES**

Statement of

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Chief Executive Officer
Association of Metropolitan Water Agencies

To the
United States Senate
Committee on Environment and Public Works

“An Information-Gathering Process on Draft
Legislation entitled, America’s Water Infrastructure
Act of 2020 and The Drinking Water Infrastructure
Act of 2020: Stakeholder Comments”

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METROPOLITAN
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Chairman Barrasso, Ranking Member Carper, and members of the committee:

The Association of Metropolitan Water Agencies (AMWA) appreciates the opportunity to offer this statement to inform the information-gathering process regarding the draft America's Water Infrastructure Act of 2020 and the Drinking Water Infrastructure Act of 2020. We commend the committee for continuing the important work of developing these legislative initiatives even as the COVID-19 pandemic continues to upend normal operations in Congress and across the country.

I am Diane VanDe Hei, Chief Executive Officer of AMWA. We are an organization representing the nation's largest publicly owned drinking water systems, which collectively serve more than 155 million Americans with quality drinking water. My statement will focus on some of the drinking water policy items of the draft Drinking Water Infrastructure Act (DWIA 2020) and the draft America's Water Infrastructure Act (AWIA 2020), but AMWA believes that the swift passage of comprehensive legislation benefitting both the nation's drinking water systems and its broader water resource infrastructure is essential this year, especially given the immense challenges posed by the COVID-19 pandemic and the economic ramifications felt all across the country.

Just last week AMWA and the American Water Works Association released a report that attempts to quantify the economic impacts of the pandemic on the nation's drinking water systems (an executive summary of the findings is included as Attachment 1). The results are not reassuring. Over the course of one full year, the pandemic is forecasted to reduce drinking water system revenues by \$13.9 billion – or nearly 17 percent of the sector's annual total. Of this sum, nearly \$5 billion represents losses from increased customer delinquencies, and more than \$500 million results from utilities'

decisions to halt water service shutoffs for nonpayment during the public health emergency. Factoring in revenue losses to the nation's wastewater systems estimated by the National Association of Clean Water Agencies,¹ total revenue losses by drinking water and wastewater systems over one year could approach \$27 billion.

These lower revenues are projected to prompt communities to reduce or delay capital expenditures in drinking water infrastructure by as much as \$5 billion over one year, which could have a cascading effect on the U.S. economy of up to \$32.7 billion, and the loss of between 75,000 and 90,000 private sector jobs. Significant financial assistance to both water systems and their low-income ratepayers is clearly necessary in the near-term, but reauthorization of various water infrastructure programs carried in AWIA 2020 and DWIA 2020 will play a key role in advancing the nation's economic recovery once the peak of the COVID-19 pandemic has passed.

Before the COVID-19 crisis took hold, AMWA had identified a number of water policy priorities that should receive the attention of Congress this year. These included reauthorizations of important water infrastructure programs, measures to help communities and homeowners remove lead service lines, and the expansion of initiatives to help drinking water systems build resilience to the effects of extreme weather and changing hydrological conditions. While a number of these priorities are addressed in the committee's legislation, AMWA is pleased to have the opportunity to offer some constructive comments to help ensure that the final version of the committee's proposal adequately addresses the challenges at hand.

¹ <https://www.nacwa.org/news-publications/press-release-details/2020/03/20/coronavirus-impacting-clean-water-agencies-local-utilities-and-ratepayers-need-assistance>.

Water System Infrastructure Resilience and Sustainability

The draft AWIA 2020 and DWIA 2020 together make significant strides toward helping the nation's drinking water and wastewater systems become more resilient to meet future infrastructure challenges. But the current drafts leave a glaring gap that will prevent a significant portion of the nation's water systems from taking advantage of this assistance.

Section 2005 of America's Water Infrastructure Act of 2018 (P.L. 115-270) authorized a new program under section 1459A(l) of the Safe Drinking Water Act known as the Drinking Water System Infrastructure Resilience and Sustainability Program. The program offers competitive grants to help communities enhance water supply options and increase the resilience of their drinking water systems to natural hazards such as floods, hurricanes, wildfires, or other hydrologic changes. The need for this program is clear, as a recent report from the Government Accountability Office recommended that EPA should take additional steps to help drinking water and wastewater systems adapt to changing hydrological conditions.² Congress authorized up to \$8 million for EPA to operate the program over two years, and subsequently appropriated \$3 million for the 2020 fiscal year. President Trump has requested another \$2 million for the program in FY21.

While section 1459A(l) represents a good start, the program is currently only available to drinking water systems that serve disadvantaged communities or communities of fewer than 10,000 people that the EPA Administrator determines lack the capacity to secure debt necessary to finance such a project. This effectively excludes

² *Water Infrastructure: Technical Assistance and Climate Resilience Planning Could Help Utilities Prepare for Potential Climate Change Impacts*, U.S. Government Accountability Office, February 13, 2020. <https://www.gao.gov/products/gao-20-24>.

from eligibility community water systems serving more than 10,000 people – roughly 4,300 of the nation’s community water systems, which serve a collective population of nearly 250 million Americans. Bipartisan legislation introduced last year in the Senate (S. 2636) would expand access to the existing the drinking water program to all community water systems, while also creating a parallel program for wastewater systems under the Clean Water Act. AMWA and a coalition of nine other water and wastewater sector organizations have endorsed this proposal.³

Unfortunately, the water system resilience proposals incorporated into AWIA 2020 and DWIA 2020 would triple the number of EPA programs aimed at addressing this topic, while not resolving the issue of eligibility for hundreds of community water systems that provide water to nearly half of the nation’s population.

The two draft bills address the water resilience programs in three phases. First, section 2001 of AWIA 2020 would establish a new Clean Water Infrastructure Resiliency and Sustainability Program under the Clean Water Act. The program would serve municipalities and intermunicipal, interstate, and state agencies, and would deliver funding for projects to increase the resilience of publicly owned treatment works to defined natural hazards. POTWs serving any community of any population would be eligible to benefit from grants awarded through the program. Eligible project parameters and application requirements of Clean Water Infrastructure Resiliency and Sustainability Program would generally mirror those of the existing drinking water program, and funding for the clean water program would be authorized at \$5 million per year for fiscal years 2021 through 2024. AMWA supports this effort to expand resilience and sustainability funding assistance to the nation’s POTWs.

³ https://www.amwa.net/sites/default/files/Cardin-Capito-S2636_10-17-19.pdf.

Section 6(a)(6) of DWIA 2020 would reauthorize the existing Drinking Water System Resilience and Sustainability Program under section 1459A(l) of SDWA – whose eligibility is limited to public water systems serving disadvantaged communities or communities of fewer than 10,000 people – at \$10 million per year for fiscal years 2021 through 2024. These small and disadvantaged community systems would also be able to benefit from a federal cost share of up to 100 percent of the project’s cost.

Finally, section 9 of DWIA 2020 would establish a separate Midsize Drinking Water System Infrastructure Resilience and Sustainability Program, which would be housed under a new section 1459F of the Safe Drinking Water Act. The permitted use of funds under this program, as well as materials that must be submitted with an application for funding, would be exactly the same as those permitted uses and application materials that are required under the existing section 1459A(l) program. The only difference from the section 1459A(l) program, aside from a lower annual authorization (\$5 million per year rather than \$10 million) and the absence of a 100 percent federal cost share option, would be the definition of entities eligible to apply for section 1459F funding. But the proposal relies on ambiguous language to outline eligibility for the midsize water system program, though it nevertheless appears to exclude hundreds of community water systems across the country.

The proposed Midsize Drinking Water System Infrastructure Resilience and Sustainability Program for section 1459F of SDWA would define an “eligible entity” to be “a public water system that serves a community with a population of (A) greater than 10,000; and (B) fewer than 100,000.” But this definition invites a significant degree of confusion. Many community water systems provide retail service to multiple

municipalities, and the sum of the respective populations comprise the water system's total service population. For example, the Wilmington, Delaware Water Department has a service population of nearly 108,000 people, but the population of the city itself is approximately 70,000 people. The difference is due to the fact that the water system's retail service area extends beyond the city limits and into several other communities in the greater Wilmington region. This could lead to confusion as to whether Wilmington is eligible for section 1459F funding. The system does in fact "serve a community" with a population between 10,000 and 100,000 people, but it also serves other communities that in sum push the system's total service population above the 100,000-person threshold.

Also in question would be the eligibility of the water system serving Tulsa, Oklahoma. EPA reports that system to have a service population of 471,000, clearly above the 100,000-person limit proposed for section 1459F. But the city also acts as a water wholesaler to several nearby communities such as Owasso, whose water system itself has a service population of 23,000. Could Tulsa then be considered eligible for a section 1459F grant because it provides water, on a wholesale basis, to a community that falls within the eligible range? The proposed language does not offer a definitive answer.

Given this uncertainty, it is worth considering how EPA might determine which water systems are eligible for section 1459F grants because they "serve a community" of between 10,000 and 100,000 people. The Safe Drinking Water Act does not define the term "community," but the Office of Water has previously suggested that a community is defined by having a "sense of place" (determined by a "geographic setting or natural/physical boundaries, standard of living, political jurisdictions") and a "sense of community" (such as "social interaction, common ties, mutual satisfaction of needs, and

often a shared place”).⁴ Using these standards, section 1459F would give EPA virtually limitless power to declare that any particular neighborhood or other segment of a city is a “community” for the purposes of the program, thereby making the public water system serving that area eligible for a section 1459F grant as long as the population of that EPA-defined community falls between 10,000 and 100,000 people.

While this interpretation would clearly help Wilmington, Tulsa, and other large community water systems access section 1459F, it does not seem to align with the committee’s intent of the eligibility definition. If the committee sought for any public water system to have access to the program if any subset of its service population fell within the prescribed range of eligibility, or if a system’s wholesale customer fit within that allowable population range, then the 100,000-person population limit would be rendered meaningless and the committee would have had no reason to include it in section 1459F at all. As a result, the section 1459F eligibility definition in DWIA 2020 appears to be an attempt to bar larger community water systems from participating in the program.

If the committee wanted to simply exclude larger communities from section 1459F without inviting this level of confusion, it could have defined eligibility based on a community water system’s total population served. EPA’s SDWIS Federal Reporting Services system has this data readily available for the nation’s nearly 50,000 community water systems, and it reports that as of the fourth quarter of 2019 there were 441

⁴ *Community Culture and the Environment: A Guide to Understanding a Sense of Place*, 2002, U.S. EPA (EPA 842-B-01-003), Office of Water, Washington, DC. https://www.epa.gov/sites/production/files/2015-09/documents/community_culture.pdf.

community water systems nationwide with a service population above 100,000 people.⁵ If section 1459F explicitly excluded these large water systems like Wilmington and Tulsa from eligibility based on their service population, then these 441 community water systems – including 84 systems that provide water service in states represented by members of the Environment and Public Works Committee – would be barred from the program (Attachment 2). The end effect would leave EPA to operate three largely redundant water system resilience and sustainability programs, while prohibiting large drinking water systems from participating in any of them. AMWA fails to see any logic in this approach.

We believe there is a better, simpler path forward for section 1459F and all three water system resilience and sustainability programs proposed by AWIA 2020 and DWIA 2020. First, AMWA supports section 2001 of AWIA 2020, creating the Clean Water System Resiliency and Sustainability Program. Just as the existing drinking water resilience program was created under the Safe Drinking Water Act, a complementary version of the program must be created under the Clean Water Act to extend resilience funding opportunities to the nation’s wastewater systems. AMWA supports creation of this program and appreciates that it would seamlessly offer assistance to all wastewater systems, regardless of the population of the communities they serve.

In terms of the two separate resilience programs proposed for sections 1459A(l) and 1459F of the Safe Drinking Water Act, AMWA strongly recommends that they be consolidated into a single program. This can be accomplished while protecting the ability of small communities to receive funding, and also extending eligibility to drinking water systems serving cities and towns of all sizes. AMWA recommends eliminating the

⁵ <https://ofmpub.epa.gov/apex/sfdw/f?p=108:200>

Drinking Water System Resilience and Sustainability Program that currently operates under section 1459A(1) of SDWA and folding it into the new program proposed to be created in section 1459F. This new section 1459F program should extend eligibility to all community water systems but should carry special provisions to ensure access for small and disadvantaged communities. These could include:

- Setting aside a portion of annual section 1459F appropriations for eligible projects serving community water systems in disadvantaged communities or with service populations below 10,000 people, to the extent that EPA receives sufficient applications from these systems; and
- Allowing EPA to increase the federal cost share for section 1459F projects serving small or disadvantaged communities to 100 percent of the project's total cost.

This construct would guarantee a specified level of assistance for projects in small and disadvantaged communities – just as current law requires and DWIA 2020 proposes – while also clarifying program eligibility, allowing all community water systems nationwide to apply for funds, and eliminating the redundancy of duplicative EPA programs. AMWA would also be willing to work with the committee if it wishes to explore further provisions to ensure that larger community water systems do not consume a disproportionate amount of funding, such as also setting aside a set percentage for medium-sized systems serving between 10,000 and 100,000 people. The bottom line, in AMWA's view, is that all of the nation's community water systems and publicly owned treatment works should have the ability to compete for funding assistance under an EPA

water system resilience and sustainability program. This is a clearly achievable objective, and we hope it will be reflected in future versions of AWIA 2020 and DWIA 2020.

Infrastructure Financing Reauthorizations

Aside from the resilience and sustainability programs, AMWA appreciates that AWIA 2020 and DWIA 2020 carry several important reauthorizations of critical water infrastructure financing programs. For example, we support reauthorization of the EPA's Water Infrastructure Finance and Innovation Act (WIFIA) program in section 2014 of AWIA 2020, and reauthorization of the Clean Water State Revolving Fund (SRF) program in section 2015. Additionally, we support the reform to WIFIA proposed by section 3010, which would reduce the number of final rating opinion letters required for each WIFIA applicant from two to one. This will significantly ease administrative burdens on water systems pursuing WIFIA assistance.

However, we view it as a missed opportunity that the bills fail to similarly propose to reauthorize funding for the Drinking Water SRF. That program was reauthorized in the 2018 AWIA law but expires after the 2021 fiscal year. EPA's most recent Drinking Water Needs Survey and Assessment identified \$472.6 billion worth of drinking water infrastructure needs over the next 20 years, and the Drinking Water SRF is a key piece of the puzzle to finance these projects.⁶ AWIA 2020 and DWIA 2020 represent the best chance to reauthorize the program before its expiration, so we urge the committee to take advantage of this opportunity.

Lead in Drinking Water

AMWA supports DWIA 2020's reauthorization of the Voluntary School and Childcare Lead Testing Grant Program, and the expansion of eligible grant recipients to

⁶ <https://www.epa.gov/dwsrf/epas-6th-drinking-water-infrastructure-needs-survey-and-assessment>.

include public water systems. AMWA also recognizes that the legislation would extend for one additional year the grant program in section 1459B of the Safe Drinking Water Act, which offers funding to help communities carry out lead reduction projects such as the replacement of lead service lines. Created in the Water Infrastructure Improvements for the Nation (WIIN) Act of 2016 (P.L. 114-322), the program was authorized at \$60 million per year through fiscal year 2021. To date Congress has appropriated nearly \$45 million to the program, but EPA has just begun the process of soliciting applications for project funding. Given the high priority of replacing lead service lines – particularly those serving low-income families – we appreciate the proposal to extend the program through 2022, though we believe the need for the program will extend far beyond that date.

AMWA also appreciates the proposal to create a lead mapping grant pilot program within section 1459B. By focusing on communities with the highest known proportion of lead service lines, the pilot program will offer opportunities to make significant progress in replacing these pipes while highlighting strategies other communities can use to address their own inventories of lead service lines.

PFAS in Drinking Water

AMWA appreciates the increased grant funding that section 4 of DWIA 2020 would authorize for Drinking Water SRF grants targeting the removal of emerging contaminants like perfluoroalkyl and polyfluoroalkyl substances (PFAS). But we note that DWIA 2020 also includes placeholder language explaining that the committee continues to review previously proposed legislation related to the regulation of PFAS in drinking water. Like any other contaminant considered for regulation under the Safe Drinking Water Act, AMWA believes that any drinking water standards for PFAS must

be transparent, science based, and should follow the consistent regulatory process laid out in that statute. Requiring EPA to develop and issue regulations for PFAS more quickly, or with different considerations, than those of other contaminants could lead to premature regulatory decisions that lack the scientific rigor otherwise assured by the law.

Moreover, AMWA believes that any provision relating to environmental cleanup of PFAS under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) must shield water and wastewater systems from liability when they have legally disposed of water treatment byproducts containing PFAS. There should be a clear distinction between polluting entities that introduced PFAS into the environment and water and wastewater systems that are on the front lines of cleaning up the contamination. Water and wastewater systems are not the producers of PFAS, but instead are the receivers of the chemicals. A water system that follows all applicable laws in its management of water treatment byproducts containing PFAS, but is still held liable for cleanup costs under CERCLA, would effectively be penalized twice: once when making investments to remove PFAS from their source waters, and again when the system is forced to pay to cleanup PFAS contamination elsewhere. Ultimately, the cost of these burdens would fall on ratepayers.

Other provisions

There are numerous other provisions within AWIA 2020 and DWIA 2020 that are of interest to AMWA, but which we did not have time to consider in depth for this statement. These include reauthorization of the Water Infrastructure and Workforce Investment program and the creation of a new Drinking Water Infrastructure Discretionary Grant Program at EPA. The latter program in particular, when established,

could serve as an effective mechanism to quickly deliver funding assistance to drinking water systems in times of emergency, such as when a global pandemic is drastically reducing revenues and threatening future capital improvements. AMWA is eager to work with the committee to ensure the program is designed to allow maximum flexibility in the use of these funds in the time of a national emergency.

Thank you again for the opportunity to submit this statement to support the committee's information gathering process. AMWA applauds members and staff for moving forward with the important work of developing 2020 water resources legislation in this time of great uncertainty and upheaval. We are eager to continue to offer our assistance as each of these proposals is refined in the months ahead.

Executive Summary

Drinking water utilities across the U.S. have experienced, and are anticipated to continue to experience, revenue and cost impacts associated with the COVID-19 crisis. This report was prepared for the American Water Works Association (“AWWA”) and the Association of Metropolitan Water Agencies (“AMWA”) to estimate the financial impacts of the crisis on drinking water utilities in the U.S.

The anticipated financial impacts were estimated by (1) obtaining recent and relevant data regarding observed or anticipated financial and operational water utility impacts, (2) monetizing the impacts, and (3) scaling up or aggregating the impacts to estimate the impacts on a national level.

The results of the assessment indicate that the aggregate financial impact of COVID-19 on drinking water utilities will likely be approximately \$13.9 billion, representing an overall 16.9 percent financial impact on the drinking water sector. These impacts are a result of drinking water utilities eliminating shut offs for non-payment, anticipated increased delinquencies as a result of high unemployment rates, reductions in non-residential water demands and associated revenues offset by increases in residential consumption, and lower customer growth. A summary of the financial impacts associated with these factors are provided in the table below.

Due to these financial impacts, drinking water utilities across the nation are anticipated to delay and reduce capital expenditures by as much as \$5 billion (annualized) to help manage cash flows due to the crisis. These capital expenditure reductions will have a cascade effect on economic activity in communities across the U.S. As a result, **communities will experience a reduction in economic activity by as much as \$32.7 billion** (annualized) in aggregate when considering economic multiplier effects. The reduction in capital expenditures is also anticipated to result in a loss of 75,000 to 90,000 private sector jobs.

Drinking water utilities may also experience additional future revenue losses estimated at approximately \$1.6 billion in aggregate as a result of deferrals of planned water rate increases, bringing **the total combined impact of the crisis on drinking water utilities to more than \$15 billion**. These deferrals will further exacerbate community economic impacts by further reducing capital spending and will put the water sector further behind in addressing its capital infrastructure needs.

The financial impact of the COVID-19 crisis on water and wastewater utilities combined is estimated to exceed \$27 billion.

Estimated Total Aggregate Financial Impact on Drinking Water Utilities

Description	2 Months	4 Months	6 Months	Annualized
Marginal Cost of Non-Shut Offs	\$0.10B	\$0.19B	\$0.29B	\$0.57B
Revenue Loss Due to Increased Delinquencies	\$0.82B	\$1.64B	\$2.46B	\$4.92B
Reduction in Commercial Revenues	\$1.23B	\$2.46B	\$3.69B	\$7.38B
Increase in Residential Revenues	(\$0.44B)	(\$0.88B)	(\$1.32B)	(\$2.64B)
Increase in Personnel Expenses	\$0.10B	\$0.21B	\$0.31B	\$0.63B
Reduction in System Development Charges	\$0.43B	\$0.87B	\$1.30B	\$2.60B
Reduction in Revenues from Lower Customer Growth	\$0.01B	\$0.05B	\$0.09B	\$0.41B
Total Aggregate Financial Impact	\$2.3B	\$4.5B	\$6.8B	\$13.9B

This assessment and report was funded by the Water Industry Technical Action Fund (“WITAF”) of AWWA. WITAF is managed by the Water Utility Council to support projects, studies, analyses, reports and presentations in support of AWWA’s legislative and regulatory agenda. WITAF is funded by a portion of organizational member’s dues.

Community Water Systems serving more than 100,000 people in states represented by an EPW Committee member

As of the 4th quarter of 2019, according to EPA's Safe Drinking Water Information System (<https://ofmpub.epa.gov/apex/sfdw/f?p=108:200>)

State	Number of CWSs	CWS Name	Population Served
Alabama	5	Birmingham Water Works	585,000
		Mobile Board of Water and Sewer	305,850
		Huntsville Utilities	262,155
		Montgomery Water Works	231,729
		Tuscaloosa Water and Sewer	172,767
Alaska	1	Anchorage	221,351
Arkansas	2	Central Arkansas Water	330,667
		Fayetteville Waterworks	102,878
Delaware	3	Artesian Water Company (Bear/Hockessin)	208,875
		Wilmington Water Department	107,976
		Suez Water Delaware (New Castle)	100,495
Illinois	10	Chicago	2,700,000

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Attachment 2

		Aurora	200,500
		Naperville	149,294
		Joliet	148,693
		Rockford	147,051
		Illinois American – Champaign	141,000
		Illinois American – East St. Louis	139,879
		Illinois American – Peoria	121,478
		Springfield	119,395
		Elgin	108,188
Indiana	5	Indianapolis	825,173
		Fort Wayne	266,000
		Indiana American Water – Northwest (Gary)	173,525
		Evansville Water Utility	173,000
		South Bend Water Works	112,400
Iowa	3	Des Moines Water Works	233,000
		Iowa American Water – Davenport	137,201
		Cedar Rapids Water Department	129,214

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Maryland	5	Washington Suburban Sanitary Commission (Montgomery County)	1,800,000
		Baltimore	1,600,000
		Glen Burnie-Broadneck	290,606
		Howard County	247,000
		Harford County	104,567
Massachusetts	6	Massachusetts Water Resource Authority	2,550,000
		Boston Water and Sewer Commission	617,594
		Springfield Water and Sewer Commission	230,331
		Worcester Water Supply Division	181,045
		Lowell Regional Water Utility	106,519
		Cambridge Water Department	105,162
Mississippi	1	Jackson	173,514
New Jersey	16	Suez Water New Jersey Hackensack	792,713
		New Jersey American Water – Raritan	615,430

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		New Jersey American Water – Coastal North	335,449
		Passaic Valley Water Commission	310,121
		Newark Water Department	294,274
		New Jersey American Water – Western	264,586
		Jersey City	262,000
		Middlesex Water Company	233,376
		Wildwood City Water Department (Cape May)	218,472
		New Jersey American Water – Short Hills	217,230
		Trenton Water Works	217,000
		Atlantic City	152,415
		New Jersey American Water – Ocean City	127,000
		New Jersey American Water – Liberty	125,000
		Suez Water Toms River	123,184
		New Jersey American Water – Atlantic County	120,146

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New York	17	New York City	8,271,000
		Suffolk County Water Authority	1,100,000
		Monroe County Water Authority	496,753
		Onondaga County Water Authority	300,000
		Buffalo Water Authority	276,000
		Suez Water New York (Rockland)	270,000
		Erie County Water Authority	248,000
		New York American Water – Lynbrook	220,000
		Rochester	214,000
		Yonkers City	196,086
		Syracuse City	192,000
		Suez Water Westchester	146,723
		New York American Water – Merrick	135,000
		Mohawk Valley Water Authority	126,250
		Water Authority of Western Nassau	120,000
		Hempstead	110,000

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		Albany	101,082
North Dakota	1	City of Fargo	120,762
Oklahoma	2	Oklahoma City	644,000
		Tulsa	471,000
Oregon	4	Portland Water Bureau	614,059
		Tualatin Valley Water District	222,000
		Salem Public Works	192,000
		Eugene Water and Electric Board	168,000
Rhode Island	1	Providence	310,060
South Dakota	1	Sioux Falls	190,326
Vermont	None	--	--
West Virginia	1	West Virginia American Water – Kanawha Valley District (Charleston)	200,679
Wyoming	None	--	--