



January 5, 2022

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board (State Water Board)
1001 I Street, 24th Floor
Sacramento, CA 95814

SUBJECT: Draft Wastewater amendments to the Water and Wastewater Arrearage Payment Program Guidelines

Dear Ms. Townsend,

On behalf of the California Association of Sanitation Agencies (CASA), the California Municipal Utilities Association (CMUA), the Southern California Alliance of POTWs (SCAP), the Bay Area Clean Water Agencies (BACWA), and the Central Valley Clean Water Association (CVCWA), thank you for the opportunity to provide comments on the Wastewater Arrearage Guidelines. CASA represents more than 125 public agencies and municipalities that engage in wastewater collection, treatment, recycling, and resource recovery. CMUA represents over 50 public water agencies that deliver drinking water to 75% of Californians. SCAP is a non-profit association representing over 80 public water/wastewater agencies in southern California who provide essential water supply and wastewater treatment for approximately 20 million people. BACWA is a joint powers agency whose members own and operate publicly-owned treatment works (POTWs) and sanitary sewer systems that collectively provide sanitary services to over 7.1 million people in the nine-county San Francisco Bay Area.

We appreciate your team’s expeditious rollout of this significant program over the last several months, as well as your engagement through the workshops with our members about the design of wastewater guidelines to account for the various bill structures that are utilized by sanitation agencies. We believe the Guidelines overall will be effective in delivering much needed assistance to wastewater agencies and their ratepayers, and we seek technical clarity on some elements to ensure they will allow for all of our members to qualify for the program.

Specifically, in Section 1, the Eligibility provision allows participation by “wastewater treatment providers that collect eligible customer revenue through property tax rolls... if they are able to identify wastewater arrearages and can directly credit customers’ accounts.” We respectfully request that the guidelines provide further information on how the process for those agencies that collect through the tax rolls will work, and expressly allow a prorated approach for arrears during property tax periods that partially overlap with the arrearage qualification period of March 4, 2020 through June 15, 2021.

Additionally, we request for entities that provide both water and wastewater services that they not be required to fill out another tax identification form to participate in the wastewater program. Finally, we request that the State Water Board recognize entities that are already within the Financial Information System for California (Fi\$Cal) so that they are allowed to choose where they want their checks to be sent. We collectively represent public agencies whose finance departments have differing addresses from the responsible person. Enabling those affected entities to choose where the checks are sent would help to streamline processing immensely and reduce administrative costs.

In closing, we reiterate our appreciation for your efforts in launching this program so swiftly to assist utilities with debt from customers’ arrears during the COVID-19 pandemic. We look forward to further collaboration as the program moves forward with applications and disbursements. If there are questions about these comments, please do not hesitate to reach us at jvoskuhl@casaweb.org, aabergel@cmua.org, lfono@bacwa.org, sjepsen@scap1.org, and eoofficer@cvcwa.org.

Thank you,

				
Jared Voskuhl CASA Manager of Regulatory Affairs	Andrea Abergel CMUA Senior Regulatory Advocate	Lorien Fono BACWA Executive Director	Steve Jepsen SCAP Executive Director	Debbie Webster CVCWA Executive Officer