

Massaro, Luly (PUC)

From: Kogut, Thomas (DPUC)
Sent: Friday, January 13, 2017 4:10 PM
To: Massaro, Luly (PUC)
Subject: FW: Public Testimony re docket 4618
Attachments: PUC oral Testimony Sept 26, 2016.docx

Mr. Pryor sent this to me. I am forwarding as public comment.

From: Donald Pryor [mailto:depryor98@gmail.com]
Sent: Friday, January 13, 2017 3:53 PM
To: Kogut, Thomas (DPUC) <Thomas.Kogut@dpuc.ri.gov>
Subject: Public Testimony re docket 4618

Hello,

I was pleased to see that Steven Hamburg's testimony from the public session on Prov Water was finally posted. Attached is my testimony also delivered at the public session and provided to the Commission and reporter at that meeting. I hope the Commission will give the issues we raised full consideration.

Donald Pryor

Providence Water (PW) Plan Does Not Eliminate Lead Service Pipes

Nearly half of the requested 12% rate increase is to expand the Infrastructure Replacement Program, particularly rehabilitation of the distribution system. In the last rate increase request, rehabilitation was described as a 20-year, \$500M project. Now it is being described as a “perpetual” program – yet it will not eliminate lead service pipes.

Mr. Caruolo has testified that “13,800 lead service pipes remain in our system but the number of private lead service pipes is much greater.”

PW Needs to Set a Full Lead Service Line Replacement Goal

No level of lead in drinking water has been found to be safe but the current “action level” is 15 parts per billion (ppb).

Providence Water exceeded action levels every year since 2006 until they just met the threshold in 2015. Still 28 of the 276 homes tested showed higher levels.

Because of exceeding the action level, PW was required to replace 7% of lead service lines annually. PW replaced the public side but did little to encourage private side replacement. Research showed that these partial lead service replacements made little improvement in the long run and actually made lead exposure worse in the short run. The RI Department of Health, under public pressure, suspended partial lead service replacements in 2012. However, rehabilitation work this summer has clearly resumed the public side replacement of lead service lines. Few private side service lines appeared to be replaced even though replacement in conjunction with rehab work should be much less expensive because no additional excavation would be needed in most cases. Other jurisdictions (such as Boston, Madison, St. Paul, the District of Columbia, etc.) have developed incentives to gain strong participation by property owners. Yet PW reportedly gets only 1-2% of customers to replace private side lead service lines. PW needs to do better. The plan should have a clear goal of full replacement of all lead service lines.

Lead is a Serious Health Concern

Young children with elevated blood lead levels have trouble learning to read and do math. These difficulties do not disappear as children grow up. The percentage of one to five year olds in Providence neighborhoods with elevated blood lead levels (above 5 micrograms/deciliter) ranges from 5% to 18% -- as high as one in six kids. CDC studies have shown that lead from water is a significant source even in areas where exposure to lead paint is common. Marc Edwards, a Virginia Tech scientist, well-known national authority and member of PW's expert panel, has stated that their studies have shown that an increase of one ppb in water lead resulted in a 35% increase in blood lead level.

PUC Must Require PW to Meet its Responsibilities

PW proposes to add phosphates to their water to reduce corrosion. Experts agree that corrosion control can reduce lead levels but cannot be a substitute for lead service line replacement. Further, phosphorus in lakes, rivers and streams endangers aquatic life. RI Department of Transportation has

set aside \$100M to reduce phosphorus in runoff from state roads. Warwick's Sewer Authority has recently spent more than \$10M on a required phosphorus removal treatment system – but is concerned that a 40% increase in phosphorus load from PW will overwhelm their system and exceed permit limits.

I have a three-year old granddaughter who stays with us regularly. To protect her and anyone else who might live in this house, I would like to replace our water service line that is probably lead. But PW has told me that since we are not in the “project area” they will not replace the public side of our water line. I could only replace our side of the line creating the partial lead service replacement problems.

The PUC is charged with reviewing the “sufficiency and reasonableness of facilities and accommodations of ...water utilities”. The PUC should question whether PW's current plan meets those tests with respect to eliminating lead service pipes.

Mr. Hamburg may have some new information about partial lead service replacement. If it is shown to be more effective than earlier tests, that will make the job easier. But the goal needs to be full lead service replacement. Under the Water Resources Development Act passed overwhelmingly by the Senate just last week, PW's partial lead service replacements would not be eligible for new federal funding.

Testimony for PUC Public Comment Hearing, September 26,
2016

Donald Pryor