



January 23, 2019

RE: Senate Bill 27 – Proposed Oregon Health Authority, Drinking Water Program fees

Dear Senator Anderson and Committee Members,

The following written testimony represents Tualatin Valley Water District's (TVWD) response to Senate Bill 27, the proposed Oregon Health Authority (OHA), Drinking Water Program fees.

- As a water provider to a significant portion of Washington County, TVWD remains supportive of the OHA's Drinking Water Program and its mandate to protect public health through access to safe, reliable drinking water.
- To invest in safe drinking water for the long-term, an increase in dedicated general funds is the most appropriate pathway to support the OHA's mission.
- Consistent with past communication, an additional investment by the Governor's office and the legislature of \$2 million in dedicated general funds would be an appropriate starting point.
- TVWD would like to see a commensurate increase in services and assistance to water providers regulated under OHA for support of these fees. Examples of improved services include the following:
 - Better defined processes and approval timeline for water providers when presenting data and literature supporting an alternative option to meet OHA requirements, such as the recent process by the Oregon Water Utility Council to allow ozone for pre-filtration (i.e., intermediate) disinfection credit. This has been an ongoing item since 2017 with no conclusion to-date, and several water providers across the state are beginning design work or considering treatment upgrades using this widely accepted technology.
 - Streamlining the review process for OHA required Operator Certifications. There have been several instances of delayed applications resulting in under certified operators as well as the loss of qualified employees in some instances. Further consideration for overlapping disciplines (i.e., treatment vs. distribution) should also be reviewed as many systems have operators performing both functions.
- These fees represent an annual increase from \$2,400 to \$42,000 for TVWD based on the current system categories.

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- It is difficult to justify the additional \$17,000 required for the practice of water fluoridation. This is classified as a “treatment” process under the proposed OHA fees and makes no distinction between a full-scale water treatment plant.
- In addition, systems that have partnership-based sources may be assessed fees more than once. This could include the Joint Water Commission as a “wholesaler without distribution,” which TVWD is a member of. This is essentially requiring water system customers to pay duplicate fees for the same services.

In general, we feel an increase in dedicated, general funds is the most equitable path forward to provide clean drinking water to all Oregonians who rely on this vital resource, whether at home, or work, or during travel across the state.

Thank you for considering these comments. I can be reached at the contact information below for follow-up questions if needed.

Sincerely,

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