



The State of New Hampshire
Department of Environmental Services

Robert R. Scott, Commissioner



November 16, 2020

Via email

Ms. Jeri Weiss
Drinking Water Quality and Protection Unit
USEPA - New England
One Congress Street, Suite 1100 (CDW)
Boston, MA 02114
Weiss.Jeri@epa.gov

Re: **New Hampshire Capacity Development Triennial Report to the Governor July 2018 to June 2020**

Dear Ms. Weiss:

We are submitting herewith New Hampshire's Triennial Report to the Governor for state fiscal years (SFYs) 2018-2020. This report is posted annually for public review at www.des.nh.gov, A to Z List, **Small Public Water System Help Center**.

The report is organized in accordance with EPA's requirements to include state activities and control points for capacity assurance for new and existing non-transient public water systems. Special initiatives pursued during this fiscal year included:

- Remotely-conducted sanitary surveys and assessments for safe inspections during the SARS-CoV-2 pandemic;
- One-on-one outreach on Level 1 and Level 2 assessments for the Revised Total Coliform Rule (RTCR), in an effort to reduce recurring total coliform issues in our very small systems;
- Continued managerial, technical and financial assistance to small, privately-owned community water systems through our Tank Inspection Grant, Asset Management Grant, the Drinking Water State Revolving Loan Fund and the state Drinking Water and Groundwater Trust Fund; and,
- One-on-one assistance to small systems to develop water system business plans for those receiving SRF and Trust Fund loan or grant awards.

Please contact me at (603) 271-2949 with any questions or comments about our technical assistance activities or this report.

Very truly yours,

Shelley Frost, P.E., P.G.
Small Systems Survey and Technical Assistance Program Manager
Drinking Water and Groundwater Bureau

cc. B.Kernen, C.Klevens – NHDES DWGB

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NHDES CAPACITY DEVELOPMENT TRIENNIAL REPORT TO THE GOVERNOR July 2018 to June 2020

Robert R. Scott, Commissioner
Brandon Kernen, P.G., Drinking Water & Groundwater Bureau Administrator

September 30, 2020



Drinking Water and Groundwater Bureau

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Compiled by Shelley Frost, P.E., P.G.

NEW HAMPSHIRE



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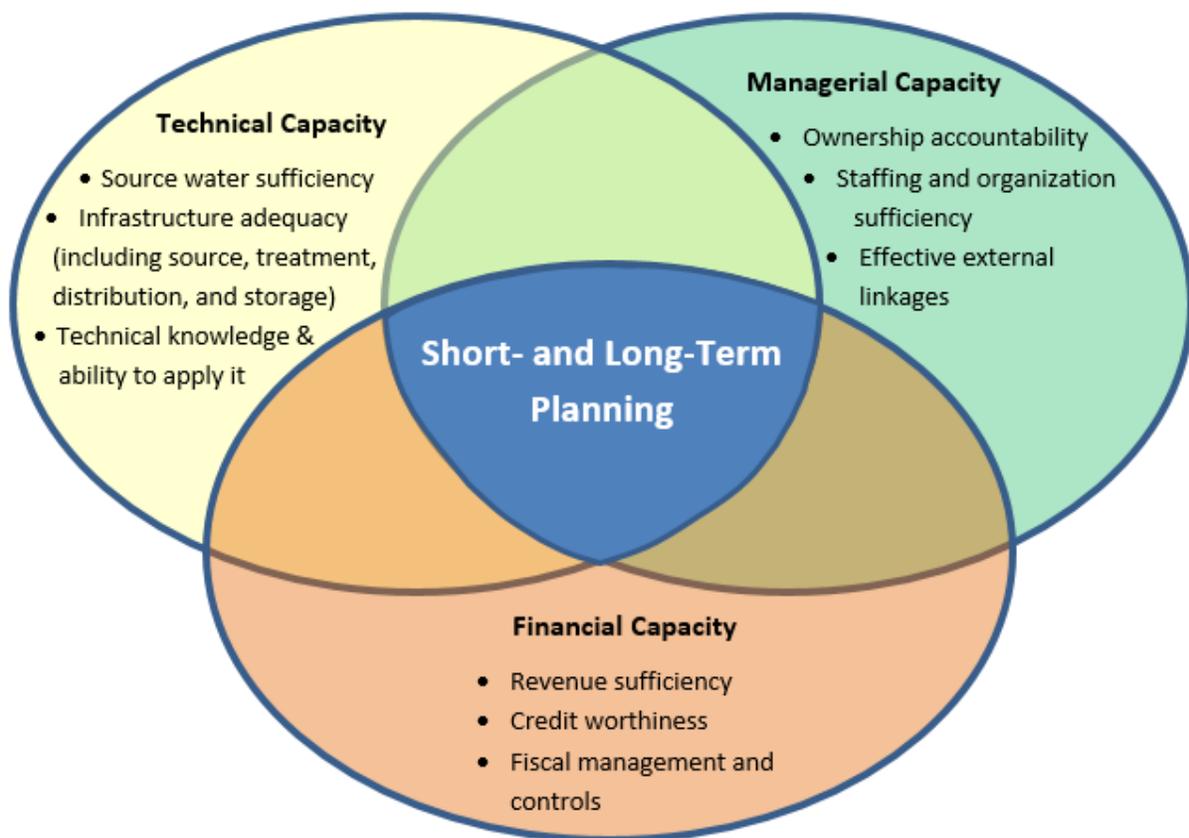
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I. INTRODUCTION

1. BACKGROUND

Under the 1996 Amendments to the Safe Drinking Water Act (SDWA), Section 1420(c), each state must develop, implement, measure and report on their “capacity assurance” efforts to ensure that all new and existing public water systems (PWS) have adequate technical, managerial and financial means to provide clean, safe and reliable drinking water to their customers. States failing to comply with these requirements are subject to withholding up to 20 percent of their Drinking Water State Revolving Loan Fund (DWSRF) allotment. Water system capacity is defined in three categories, as shown in the image below.

Figure 1 – Small Water System Challenges



Technical: The physical and operational ability of a water system to meet SDWA requirements, including the adequacy of its source water, physical infrastructure, technical knowledge and capability of operating personnel.

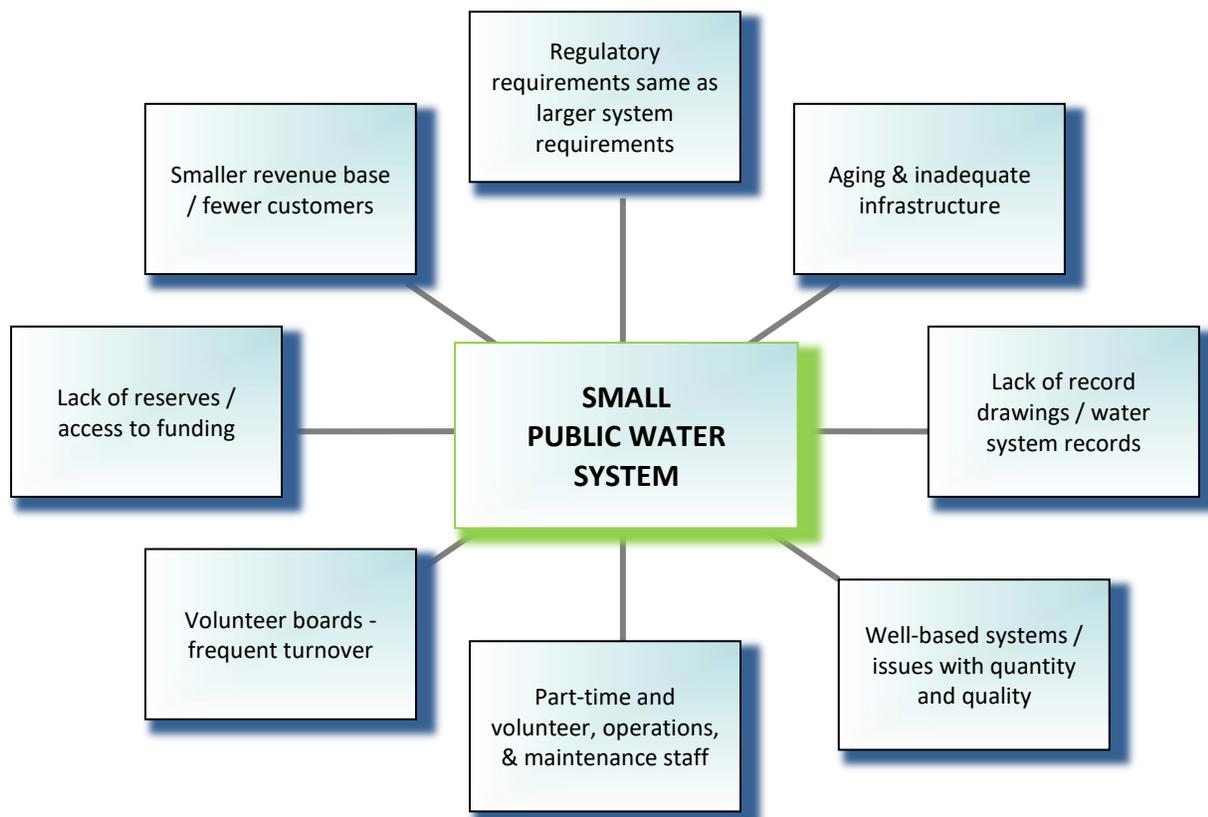
Managerial: The ability of a water system to conduct its affairs in such a manner to achieve and maintain compliance with SDWA requirements, including the system’s institutional and administrative capabilities.

Financial: The water system’s ability to acquire and manage sufficient financial resources to achieve and maintain compliance with SDWA.

This report is structured in accordance with the reporting criteria required by EPA. Section II describes water system compliance issues or capacity development “needs”; Section III describes activities to ensure adequate capacity of *new* public water systems; and Section IV summarizes activities to improve the capacity development of *existing* systems.

The goal of capacity assurance is to improve the long-term sustainability and rate of compliance of **community public water systems (CWS) and non-transient non-community (NTNC) public water systems**. New Hampshire’s program is administered through the New Hampshire Department of Environmental Services Drinking Water & Groundwater Bureau (DWGB). New Hampshire focuses our capacity development efforts on the very small water systems (<250 service population), because these systems exhibit a multitude of hardships to manage and maintain water system compliance (Figure 1), have a limited rate base, and incur the highest number of violations both for health-based parameters and for monitoring and reporting requirements.

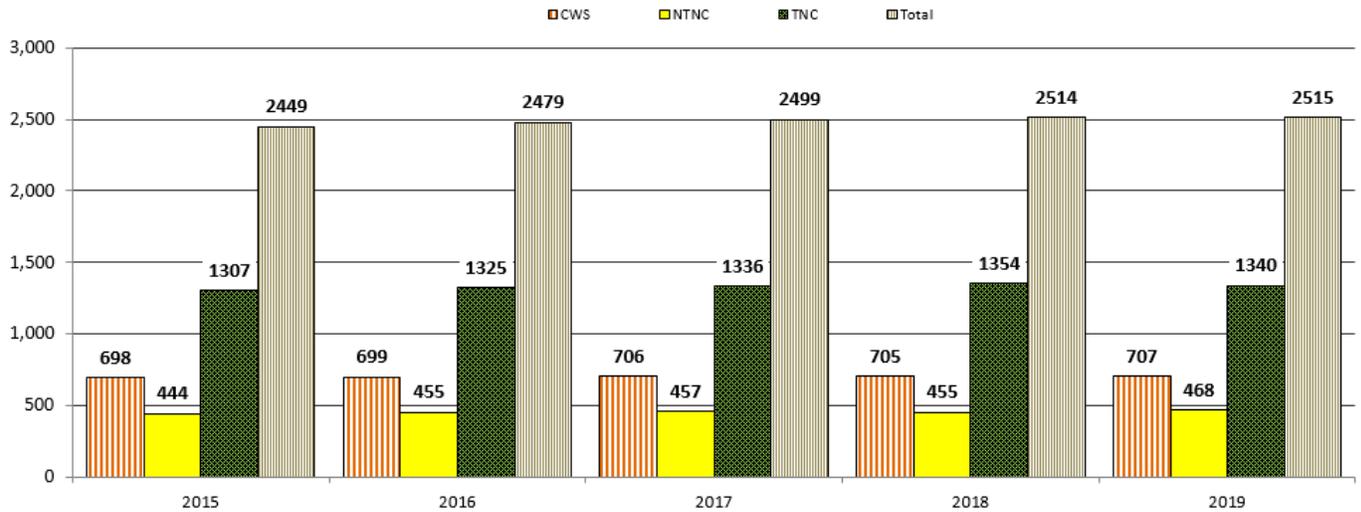
Figure 1 - Small Public Water System Challenges



2. PROFILE OF NEW HAMPSHIRE PUBLIC WATER SYSTEMS

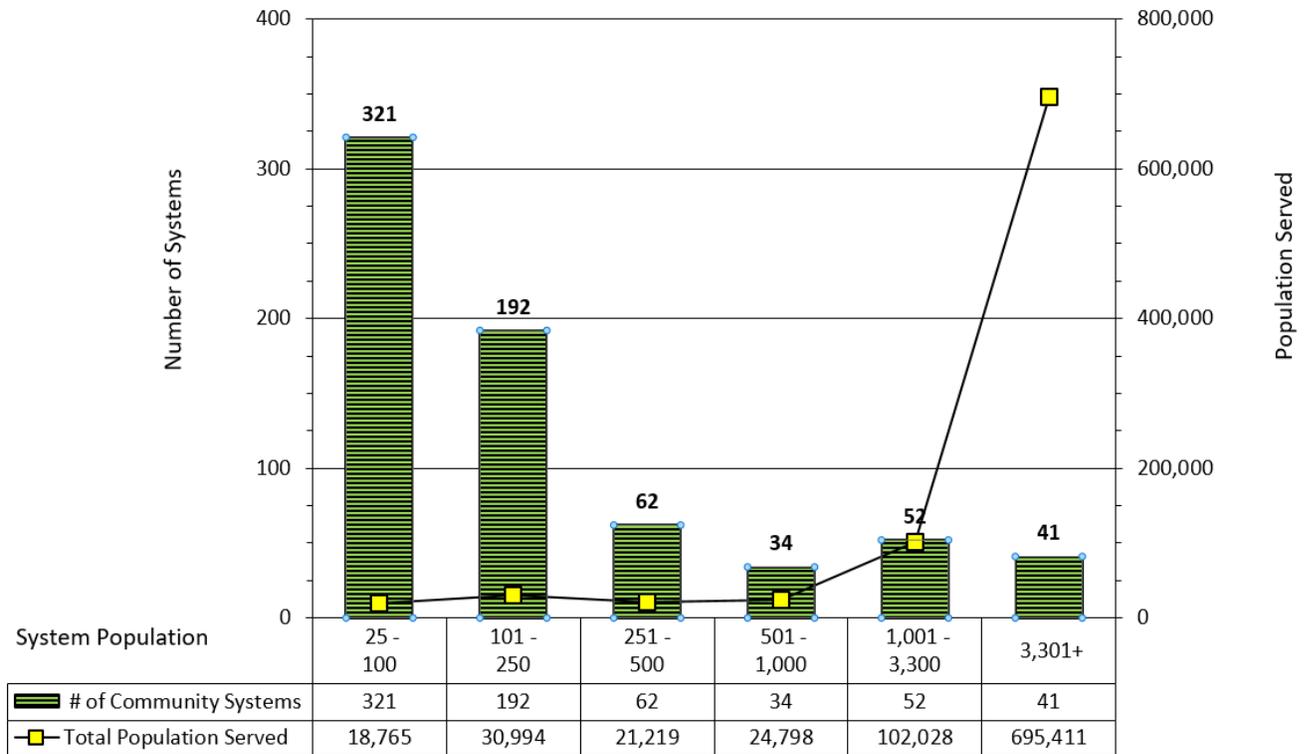
In Calendar year 2019, New Hampshire’s approximately 2,500 public water systems consisted of about half (47%) non-transient systems, serving residential communities, schools and businesses. The remaining 53% serve transient populations such as hotels, restaurants and campgrounds (Figure 2). It is important to note that this report addresses public water systems only which serve about half (~54%) of the state’s residential population, as remaining residents are served by **residential wells** which are not regulated under the Safe Drinking Water Act.

**Figure 2 - Active Small Public Water Systems in NH
(by Calendar Year)**



Further breakdown of New Hampshire’s public water system inventory shows that **73%** of our residential *community water systems* serve 250 people or less, representing about **6%** of the community water system service *population* (Figure 3). This bracket has the highest rate of non-compliance, underscoring the need to target capacity assistance efforts to these systems.

**Figure 3 - Community Water Systems
by Population Served in Calendar Year 2019**

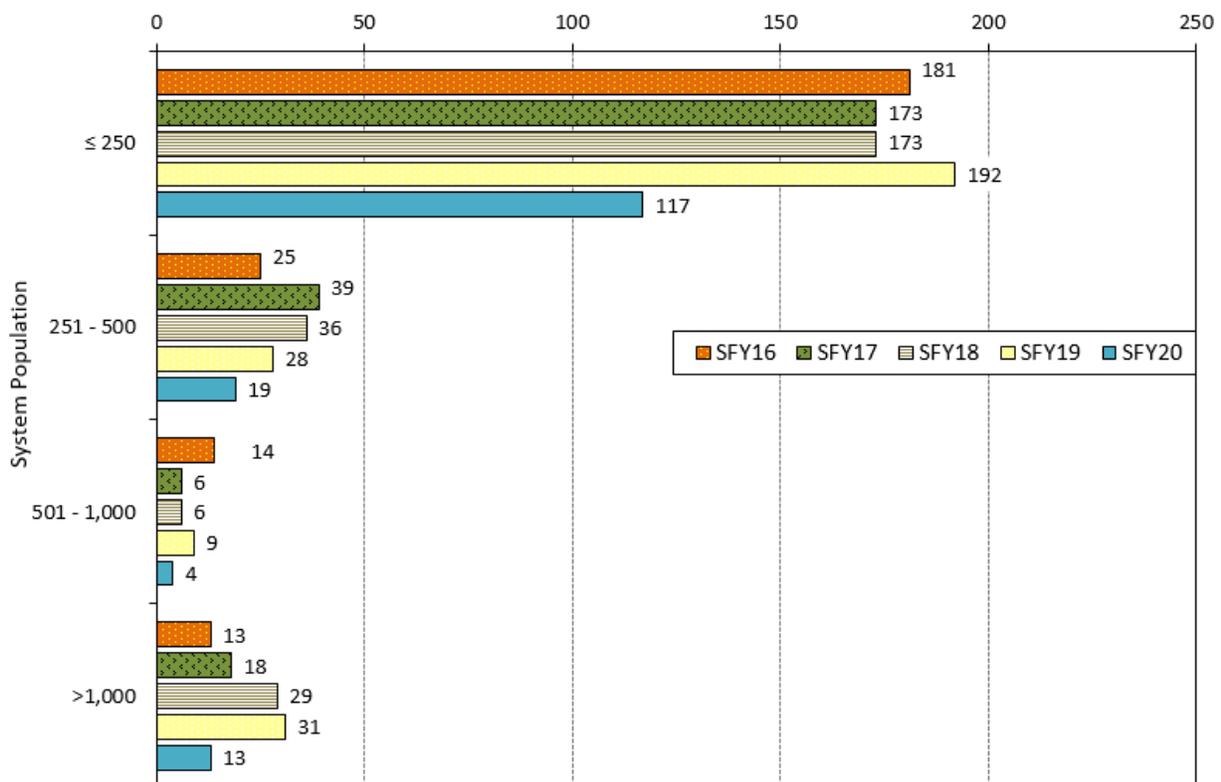


II. STATEWIDE CAPACITY NEEDS IDENTIFIED THIS PERIOD

1. VIOLATIONS FOR MONITORING AND REPORTING

Most Monitoring and Reporting (M/R) violations are caused by failure to sample or report sample results for bacteria and disinfection byproducts on time. Figure 4 depicts total M/R violations issued for bacteria, disinfection byproducts, sampling for other chemicals, and lead and copper. The number of M/R violations issued to systems serving up to 250 persons is over three times higher than those issued for all other system sizes, due to the number of very small systems in the state but also their higher rate of non-compliance. The number of violations in State Fiscal Year 2020 (SFY20) was lower than prior years likely due to additional outreach and sampling extensions granted to accommodate operations through the Covid-19 pandemic.

Figure 4 - Monitoring and Reporting (M/R) Violations by System Population
(by State Fiscal Year [July - June])



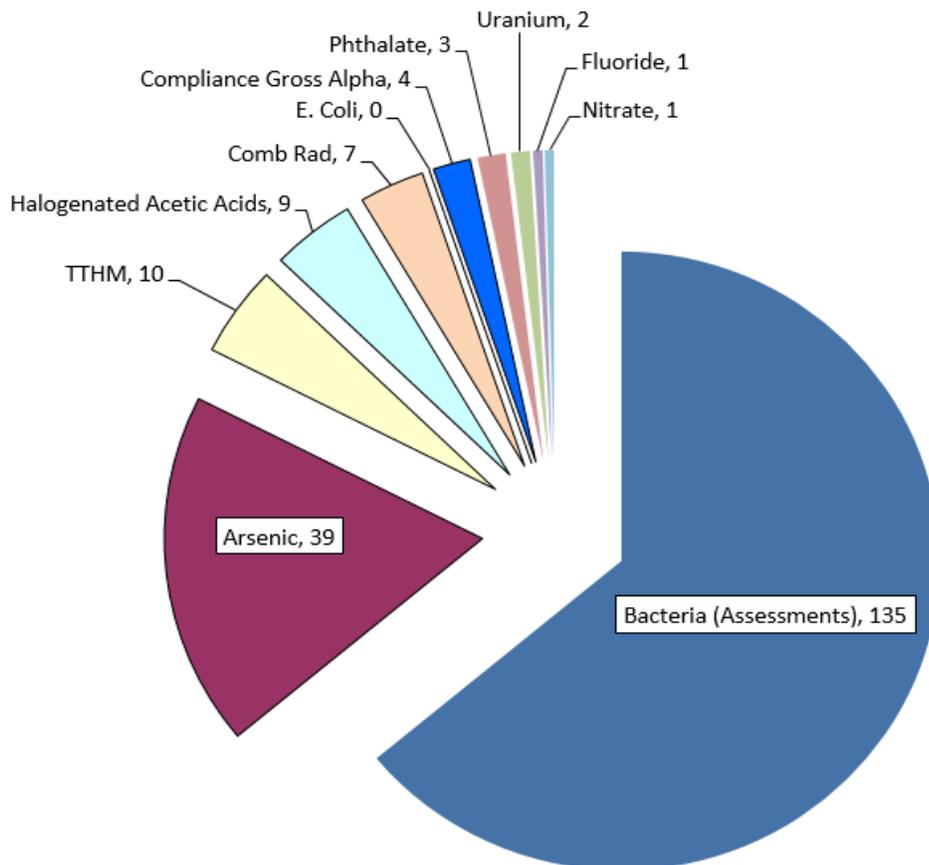
It is also important to note that transient systems receive roughly three times the number of monitoring and reporting violations compared to non-transient systems in the state (507: 152 transient: non-transient systems for SFY20), generally because transient systems are not required to hire a certified operator in New Hampshire. State direct outreach to transient systems is discussed in Section III.2.

2. VIOLATIONS FOR WATER QUALITY

Violations are issued for exceedances of health-based, maximum contaminant levels (MCLs) for *E. coli* bacteria, chemical parameters, disinfection byproducts and radionuclides. We also include Level 1 and Level 2 Assessments for Total Coliform Bacteria in this evaluation since the Revised Total Coliform Rule replaced MCLs for Assessments. A breakdown per contaminant for the past state fiscal year (Figure 5) shows that Bacteria and Arsenic continue to be the priority for outreach and assistance, especially for the very small systems. Systems serving 25 to 250 people incurred 62% of the water quality violations in SFY20.

Figure 5 - Chemical MCL Violations and Bacteria-based Assessments for Non-Transient Systems

(SFY 2020, Total MCL exceedences including Bacteria L1 and L2 Assessments = 135)



3. NON-TRANSIENT SYSTEM CATEGORIES WITH MOST VIOLATIONS

The top categories of systems serving up to 1,000 people incurring state and federal violations in 2020 are ranked in Figure 6A (affecting the largest number of systems) and Figure 6B (relative to the number of systems in each category). Both figures indicate where targeted messaging may be directed to help reduce violations.

Figure 6A - Water System Categories with Most Systems in Violation
 Non-transient systems (25-1,000 persons), SFY 2020
 Numbers represent number of systems receiving at least one violation

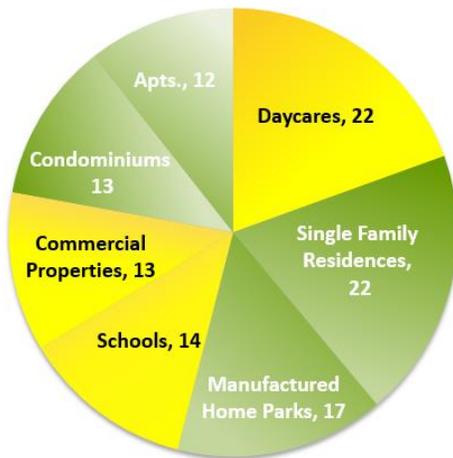
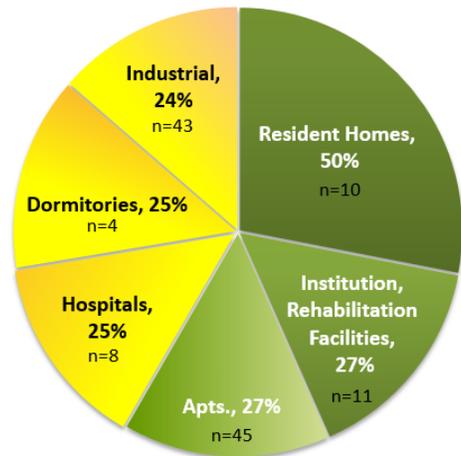


Figure 6B - Water System Category Violation Rates
 Non-transient systems (25-1,000 persons), SFY 2020
 Category Violation Rate = No. of Violating Systems/No. of Systems in Category



Notes: Includes all violation types (state and federal) except permit-to-operate. Green fill denotes community systems, yellow fill denotes non-community systems.

4. DEFICIENCIES NOTED FROM ONSITE INSPECTIONS AND ASSESSMENTS

Sanitary Survey Inspection Deficiencies

New Hampshire inspectors perform between 650 to 700 public water system sanitary surveys each year to evaluate the eight core elements of each water system. The top five significant deficiencies in CY19 were: well cap/cover sanitary seal problems (58 citations), inadequate or missing source sample tap (25), storage tank subject to contamination (23), various distribution system deficiencies such as leaks and failed valves (14), and failure to obtain state design approval for system modifications when required (14).

Sanitary Survey enforcement in New Hampshire starts with issuance of a state-only Notice of Violation (NOV) when systems fail to correct a sanitary survey deficiency within the required timeframe, which is generally set at 30 days. If the system still fails to correct the deficiency after receipt of the NOV, the next level of enforcement is a Letter of Deficiency (LOD).

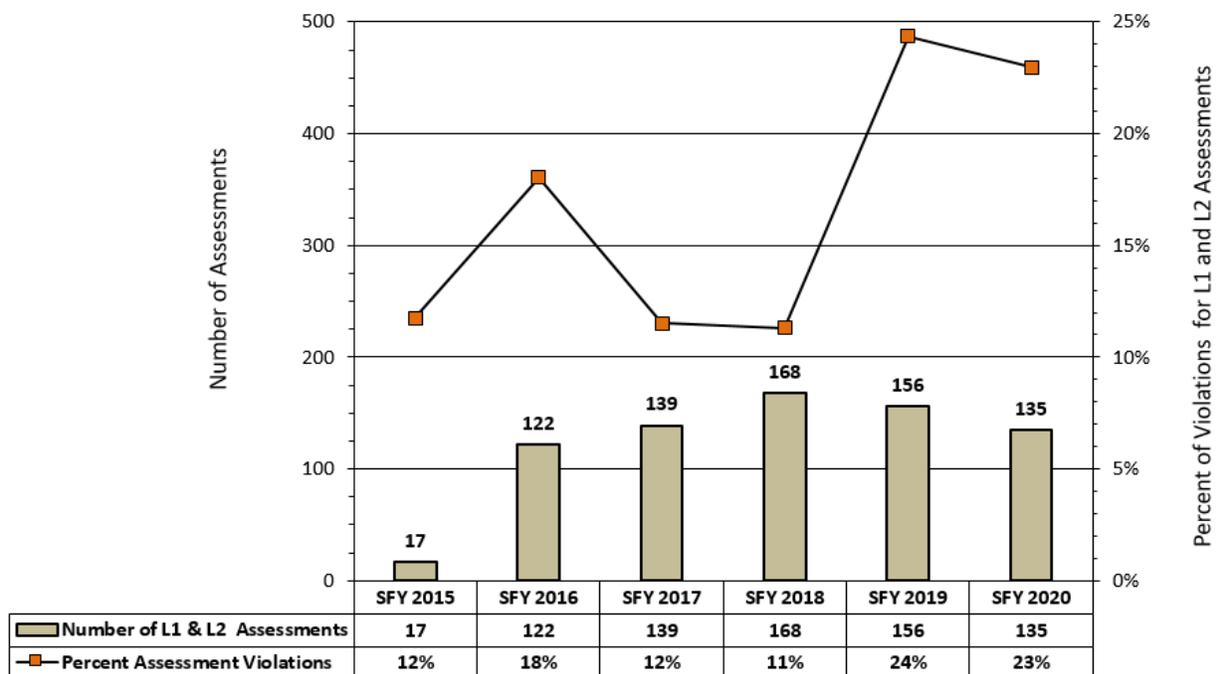
Depending on the type of deficiency and the length of time to correct, the water system may also incur a federal violation and requirement for Public Notice.

Bacteria Assessment Sanitary Defects

Approximately 150 assessments are triggered each year by non-transient systems (Figure 7). Even so, this number is still below the typical 201 to 236 annual MCL violations occurring in the five years before the RTCR was implemented. Typically about 2/3 of assessments are triggered due to the actual detection of total coliform, while the remaining 1/3 are due to either late sampling or failure to collect repeat samples. Letters are sent following the first total coliform event to better address the sampling requirements and possibly avoid repeated assessments. Additional outreach on the need for repeat sampling following a positive total coliform detection will be targeted especially to the very small systems to help reduce the number of assessments going forward.

The violation rate for incomplete, inadequate, or missing assessments has increased by 12% in the least two years due to failure to submit a completed assessment form on time. Since the start of the RTCR in 2016, New Hampshire provides technical assistance to address the causes of coliform in systems experiencing repeated assessments.

Figure 7 - Level 1 and 2 Assessments and Assessment Violation Rates
(for Non-Transient Systems per SFY)



5. IDENTIFICATION AND PRIORITIZATION OF SYSTEMS IN NEED OF ASSISTANCE

Small systems in need of targeted, one-on-one technical assistance through the Capacity Development Program are identified through regular interactions including sanitary surveys, referrals from contract operators, customer complaints, grant and loan application lists, boil order assessments, repeated assessments, bulk water deliveries, enforcement lists, and database queries for accumulated violations. A rolling capacity development “priority list” is maintained wherein each system is assigned a lead “Technical Assistance” contact from the bureau, to identify root causes and solutions with the system representatives and consultants.

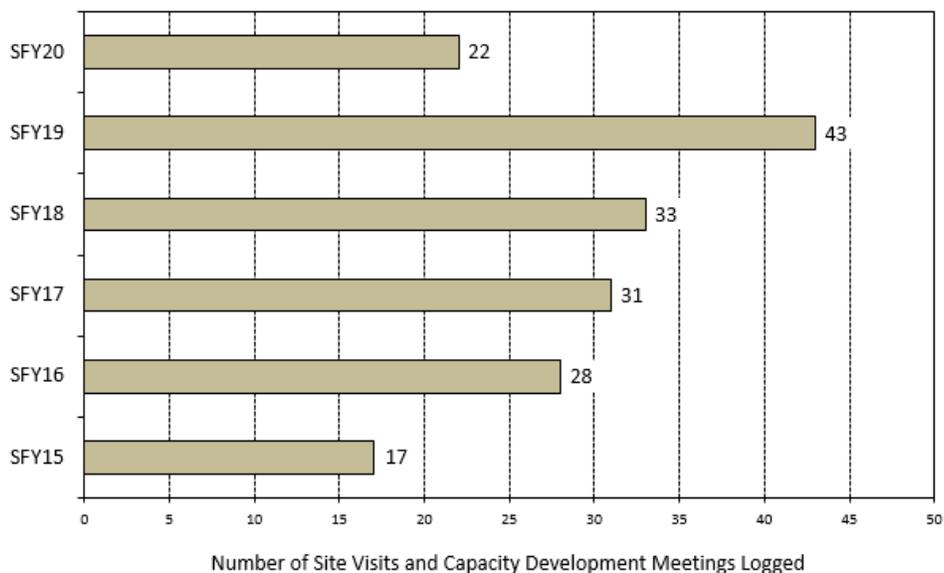
In SFY20, staff extended one-on-one, capacity development assistance to 22 non-compliant systems. Systems receiving repeated technical assistance attention are also tracked. Of these, 17 resolved their deficiencies in SFY20, while 18 new systems were added. Of the capacity systems active in SFY20, 12 are receiving funds from the Drinking Water State Revolving Loan Fund (DWSRF), and two have been identified for assistance through the state’s allotment from the Water Infrastructure Improvements for the Nation (WINN) Assistance to Small and Disadvantaged Communities.

Technical Assistance (TA) and parallel enforcement interactions with systems on the priority list (and others) are documented in water system files. Capacity development efforts often require several months to years to address the core causes of non-compliance. Assistance efforts typically include site visits and meetings, email and phone interactions, coordination with national and state TA partners, and funding assistance via grants and/or the DWSRF. This assistance lowers the number of violations, which allows higher enforcement to focus on the least responsive violators.

TA site visits and meetings attended by DWGB staff for SFY15 to SFY20 are shown in Figure 8. These site visits are *in addition* to standard sanitary surveys, permitting inspections, DWSRF inspections, and other special investigations performed by DWGB technical staff. TA visits to new transient system owners include delivery and review of a customized e-binder with sampling schedule and forms, instructions for using the PWS online portal “OneStop,” and guidance on proper sampling procedures, to orient them to their responsibilities as a PWS.

Further one-on-one assistance was given to small systems for business plans, resulting in improvements in tracking water system expenses and attention to water rates for responsible fiscal planning. Since SFY16, New Hampshire requires a full business plan as a condition for small systems receiving an SRF loan. Targeted technical assistance is provided every year to these small systems to create their own business plan including a detailed asset inventory, detailed budget review, financial strategy, and discussion of water rates.

Figure 8 - Technical Assistance Visits & Meetings by DWGB Staff



III. CAPACITY ASSURANCE FOR NEW SYSTEMS

From their inception, new public water systems must be designed to support adequate technical, financial and managerial resources for their long-term sustainability and reliability. This section describes state rules and control points for capacity assurance for new systems.

1. DESIGN STANDARDS AND CAPACITY ASSURANCE REGULATIONS

Capacity assurance for new water systems begins with a detailed review of system water sources and infrastructure design in accordance with state regulations. Applicable standards are established in the following Administrative Rules:

- Env-Dw 301 Small Production Wells for Small Community Water Systems.
- Env-Dw 405 Design Standards for Small Community Water Systems.
- Env-Dw 406 Design Standards for Non-community Water Systems.
- Env-Dw 600 Capacity Assurance for Proposed and Existing Public Water Systems.

New Hampshire's main control point for capacity assurance is the water system **Business Plan**. As established by Env-Dw 602 Capacity Assurance for Proposed Public Water Systems, the business plan documents the water system asset inventory, management structure, and financial assets.

New Hampshire approved eight (8) new or reclassified Non-Transient systems in SFY20. One system, NH1212030 Wildcat Townhouse Resort in Jackson, was reclassified to a community system in 2018 following significant system renovations, but incurred some monitoring and reporting violations and failed to complete the well permitting requirements in 2019. Extensive outreach was performed and the system is on a path to return to compliance, but is being tracked by the State and EPA's Enforcement Targeting Tool (ETT) report.

2. CAPACITY ASSURANCE FOR NEW SYSTEM STARTUP

Capacity assurance for new system startup is accomplished through a comprehensive startup Sanitary Survey and issuance of an informative 'welcome packet' to new system owners. Additional outreach is provided for startup of new or reactivated *transient* systems by performing one-on-one meetings with new system owners at the time of system registration, as these are not required to hire a certified water operator in New Hampshire. Outreach to new owners this fiscal year included site visits to 9 systems, mailing of "New Owner Binders" to additional new owners, and additional outreach via office-based communications.

IV. CAPACITY ASSURANCE ACTIVITIES FOR EXISTING PWS

This section describes the different assistance programs administered by the DWGB to improve the managerial, financial and technical capacity of **existing** PWS. Activities include general and targeted outreach, grants and loans, and one-on-one site visits and capacity meetings for technical assistance.

1. SOURCE WATER PROTECTION & EMERGENCY PREPAREDNESS ASSISTANCE

DWGB programs include regular outreach activities for source water protection and emergency preparedness assistance to community public water systems, especially municipalities and districts. Highlights for the past fiscal year included:

- Conducted three workshops to train land use planners in source water protection.
- Trained 16 local inspectors – water system employees and municipal officials – to implement best management practices inspection programs within their source water protection areas.
- Secured a US EPA technical assistance grant to conduct a statewide spill/release risk assessment to determine Tier II and other facilities with substances posing a higher risk of contaminating drinking water through time of travel and dispersion modeling.
- Provided technical assistance and resources to assist water systems with their response to COVID-19 including a weekly conference call for water operators and a weekly FAQ document.

2. GRANTS, LOANS AND ASSET MANAGEMENT

DWGB administers various funding programs to provide financial assistance and incentives for PWS infrastructure improvements and sustainability. Highlights for this reporting period include:

- Awarded of \$15.1 million from the Drinking Water State Revolving Loan Fund (DWSRF) for infrastructure project loans and \$1.03 million for source water protection (land conservation) in SFY20. For systems serving a population of up to 500, see Table 1 on following page.
- Administered a land grant program for the New Hampshire Drinking Water and Groundwater Advisory Commission that awarded seven grants totaling \$1.17 million to protect 685 acres of wellhead protection areas and water supply watershed land.
- Awarded of **13 Local Source Water Protection grants** for source security and other source protection projects totaling **\$211,000**.
- Awarded of 11 **Asset Management grants** totaling \$212,000 to assist communities with the development and/or the implementation of an asset management program. Since 2013 a total sum of approximately \$1,558,685 in grants were awarded to 71 communities with a few of these receiving multiple grants (see Figure 9 and Table 2).
- The sixth Annual **Asset Management Awareness Workshop** held 10/02/2019 had 105 participants.
- Award of 16 Energy Audits as part of the Asset Management Program.

Table 1 –DWSRF SFY20 Loan Commitments to Systems Serving <500 people

PWS ID	PWS Name	Town	Project Description	Loan Amount	Population	Projected Forgiveness
0512180	Saco Pines Condominium Association	Conway	Well and Pump House Improvements	\$210,000	50	Not eligible
2303010	Pine Grove MHP	Swanzey	Water System Improvements Project	\$500,000	305	17%
2373010	North Country Village Cooperative	Tufton-boro	Water System Improvements	\$700,000	143	15%
2512010	Pound Road Water Works	Wilmot	Pump House Improvements	\$300,000	53	10%

Figure 9 – Asset Management Grants Awarded through CY 2020

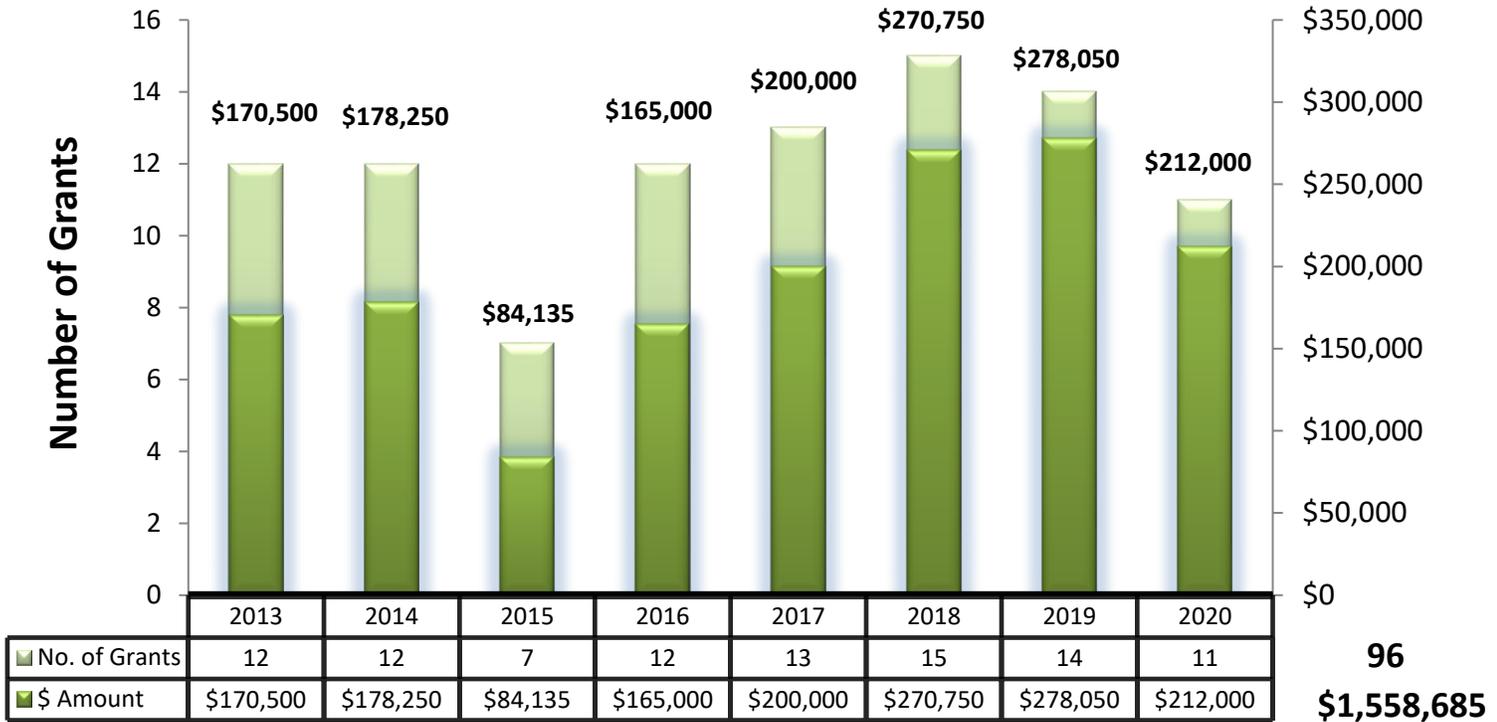
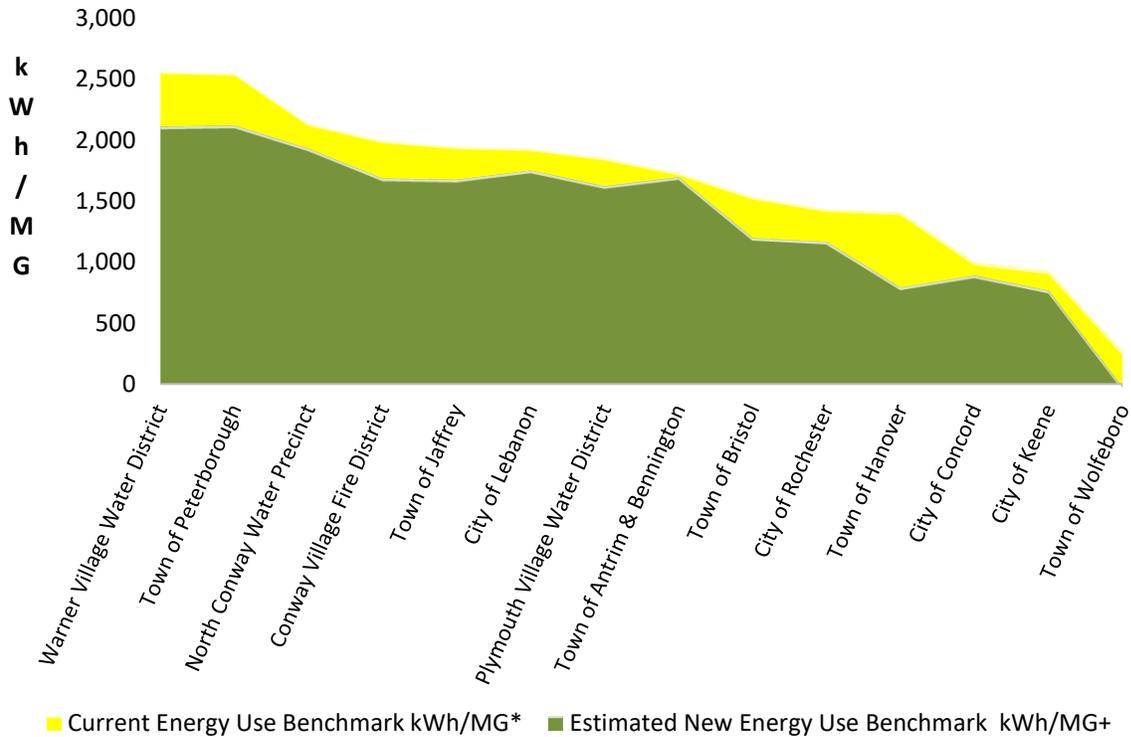


Table 2 – Asset Management Grant Awards CY2020

SYSTEMS	TOWN NAME		GRANT AMOUNT
Eastman Village Water	Grantham		\$20,000
Chalk Pond Water	Newberry		\$12,000
Pillsbury Lake District	Webster		\$20,000
Central Hookset	Hooksett		\$20,000
Alton	Alton		\$20,000
Winchester	Winchestesr		\$20,000
Waterville Valley	Waterville Valley		\$20,000
Franklin Water	Franklin		\$20,000
Manchester	Manchester		\$20,000
Somersworth	Somersworth		\$20,000
Plymouth Village District	Plymouth		\$20,000
	Subtotal		\$212,000
	Total Amount Awarded to Date:		\$1,558,685

Figure 10 - New Hampshire Water System's Energy Usage Comparison of Pre-Audit and Post-Implementation



3. OPERATOR CERTIFICATION TRAINING AND OUTREACH

The New Hampshire Operator Certification program supports numerous outreach and training activities for water system operators, owners and managers. In the past fiscal year, activities included:

- Contracting with the New Hampshire Water Works Association (NHWWA) for two Small Public Water System Operator Grade IA courses, two Basic Math courses, and two Operator Exam Review sessions.
- Contracting with the New England Water Works Association (NEWWA) (an approved IACET training provider) for 20 instructor-led training sessions in New Hampshire specifically targeted for New Hampshire water works operators.
- Coordination with NHWWA to provide six (virtual) Operator Roundtables throughout the state. These are operator-driven roundtable discussions, which allow industry professionals to relay challenges confronting them and their professions. These forums also allow operators to ask questions of state officials and for the state to discuss anticipated and new regulations.
- Trained 31 Public Water System Operators or municipal staff to conduct “best management practices” regulatory inspections that limit regulated substances discharges to the ground in source protection areas.
- Participation on the New England Water Works Operator Certification Committee. This is a regional committee comprised of New England state operator certification officers, EPA representatives and professional water works operators. The committee promotes water works operator certification and initiatives to grow and strengthen the profession.
- Participation in other statewide industry trade shows and training seminars throughout the year with the New Hampshire Water Well Association, New England Water Well Association, Granite State Rural Water Association and other training partners.

Table 3 –Operator Certification Activities

	CY2017	CY2018	CY2019
Active Certifications	972	1011	1205
Exams Administered	216	208	222

4. WATER CONSERVATION AND LEAK DETECTION SURVEYS

Promoting water conservation through outreach activities helps communicate the importance of reducing water loss and waste—especially as water and energy resources become increasingly limited. In SFY20, NHDES staff presented on water conservation and water use to the New Hampshire Chapter or American Council of Engineers, provided water conservation related articles in three of the four quarterly newsletters published by the NHDES Drinking Water and Groundwater Bureau and in one agency-wide publication. Staff also continues to use social media messaging to promote campaigns such as WaterSense’s Fix a Leak Week, provide water saving tips, and guidance during drought.

Leak detection and repair play a fundamental role in reducing water loss and energy costs related to the treatment and delivery of drinking water. In CY2019, the professional leak

detection firm hired through DWSRF set-asides completed surveys for 47 community water systems, spanning approximately 962 miles of pipe. One-hundred-ten leaks were discovered, totaling approximately 765 gallons per minute. This equates to roughly 402 million gallons per year, which is equivalent to 11,000 people using 100 gallons of water per day for a year.

In SFY20, a contract with a leak detection firm was approved. This contract encumbered DWSRF set-asides to fund leak detection surveys during CY2020 at 49 community water systems, spanning approximately 1,052 miles of pipe. Due to travel restrictions associated with COVID-19, the leak detection firm could not travel to New Hampshire to complete the leak detection surveys. This contract is planned to be extended, and the leak detection surveys are planned to be completed in CY2021. As a result, no leak detection surveys using DWSRF set-asides will be completed in CY2020.

V. STATEWIDE REVIEW OF IMPLEMENTATION PROGRESS

Review of the capacity program implementation progress consists of biweekly meetings by the lead TA contacts, quarterly measures tracking through the statewide Measures Tracking and Reporting System (MTRS), and annual reports to EPA.

VI. IMPROVEMENTS TO CAPACITY DEVELOPMENT STRATEGY

For SFY21, New Hampshire will continue to build and enhance its capacity development strategies for existing systems, including:

- Targeted outreach to small system on repeat bacteria sampling requirements following Total Coliform detections, to reduce as many as 1/3 of required bacteria assessments;
- Targeted outreach to specific small system categories identified as incurring higher numbers of violations;
- Online training and seminars to assist small system compliance with the new state MCLs for Arsenic (5 ppb), and 4 PFAS compounds (PFOA, PFOS, PFNA, PFHxS);
- Renewed Water Conservation outreach to all community water systems for improved resiliency to drought events;
- Continued grants for small systems for performing Storage Tank Inspections; Asset Management Plans, and Leak Detection Surveys;
- Continued development of water system Business Plans for asset management planning for systems serving <500 population that receive funding from the Drinking Water State Revolving Loan Fund and the state Drinking Water and Groundwater Trust Fund.
- Continued one-on-one outreach and assistance to non-compliant systems and those lacking general capacity assurance.
- Continued collaboration with local and national TA providers including Granite State Rural Water Association, RCAP Solutions, Environmental Finance Center Network, New England Water Works and New Hampshire Water Works Association.