



**American Water Works  
Association**

*Dedicated to the World's Most Important Resource™*

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April 13, 2021

Radhika Fox  
Office of Water  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Ms. Fox,

The American Water Works Association (AWWA) is pleased to provide you with “Improving the Evaluation of Household-Level Affordability in SDWA Rulemaking: New Approaches” which we are submitting on behalf of the expert panel that authored it.

The report details a series of suggestions for how EPA can effectively analyze impacts of its drinking water regulatory decisions on household affordability, helping to assure that both the Agency and the public understand the impacts and can make better decisions. Amongst seven key recommendations and four analysis metrics are a suggestion for increased focus on the impacts to households in the lowest quintile of income (instead of a reliance on median household income) and a better understanding of distributional impacts of rules. The recommendations are intended to better inform decisions made by the Agency, states, and public water systems, including helping to identify and address environmental justice during decision-making processes.

This report reflects the work of an expert panel of researchers, consultants, and others with expertise on water affordability and regulatory processes. The report would not have been possible without the leadership of the panel co-chairs, Cary Coglianese from the University of Pennsylvania and John Graham from Indiana University. The panel also benefited from EPA staff participating as observers; we are very appreciative of these observers fitting the panel meetings into their busy schedules.

If you have any questions regarding this report or if AWWA can be of assistance in some other way, please contact Adam Carpenter at (202) 326-6126 or [acarpenter@awwa.org](mailto:acarpenter@awwa.org). AWWA anticipates following on this report with a second study that will test implementation of the panel recommendations. We would welcome your input as we organize this next project and EPA observers participating in our continuing effort.

April 13, 2021

Page 2

Best regards,

FOR THE AMERICAN WATER WORKS ASSOCIATION

A handwritten signature in black ink that reads "G. Tracy Mehan, III". The signature is written in a cursive style with a large, stylized initial "G" and a flourish at the end.

G. Tracy Mehan, III  
Executive Director, Government Affairs  
American Water Works Association

cc: Jennifer McLain  
Eric Burneson  
Al McGartland  
Sonia Brubaker  
Lili Wang  
Mark Pollins  
Andrew Sawyers  
Cary Coglianesse  
John Graham

**Who is AWWA?**

*The American Water Works Association (AWWA) is an international, nonprofit, scientific and educational society dedicated to providing total water solutions assuring the effective management of water. Founded in 1881, the Association is the largest organization of water supply professionals in the world. Our membership includes more than 4,500 utilities that supply roughly 80 percent of the nation's drinking water and treat almost half of the nation's wastewater. Our 50,000-plus total membership represents the full spectrum of the water community: public water and wastewater systems, environmental advocates, scientists, academicians, and others who hold a genuine interest in water, our most important resource. AWWA unites the diverse water community to advance public health, safety, the economy, and the environment.*