



## The Public Service Commission State of South Carolina

JOHN E. "BUTCH" HOWARD  
COMMISSIONER, FIRST DISTRICT  
VICE CHAIRMAN

March 30, 2010

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*Re: Issue of human rights obligations related to access to safe drinking water and sanitation*

Dear Ms. de Albuquerque,

Recently, I was made aware of the Human Rights Council's studies into water as a human right and the implications on how water and sanitation services should be delivered. As Chairman of the Water Committee for the National Association of Regulatory Utility Commissioners (NARUC) I wanted to provide you, as the Independent Expert leading this important fact finding study, my perspective on how the private water sector provides safe reliable water and sanitation services for the American people.

To provide some background, state public utility commissioners economically regulate essential utility services, such as electricity, gas, telecommunications, transportation and water. As economic regulators, we are charged with the ever important task of protecting the public and ensuring that rates charged by regulated utilities are fair, just and reasonable in the fifty States, the District of Columbia, Puerto Rico and the Virgin Islands. NARUC is an organization whose chief objective is to serve the consumer interest by seeking to improve the quality and effectiveness of public regulation in America.

Commissions struggle with the issues associated with small, poorly managed water systems that fall short of their responsibilities to the public. Given the capital intensity of water service it is necessary to search for ways to achieve economies of scale as well as ways to provide technical and managerial expertise. It has been my experience that private water service providers can be an important part of the solution and bring a breadth of experience, technology and access to capital for infrastructure investment.

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We all can agree that providing sustainable, high-quality, affordable water service is vital to all life's pursuits. As economic regulators we strive to uphold and advance that mandate every day. We work with the state's environmental regulators to secure our communities' compliance with federal environmental water quality standards and best practices for service. We're proud of the framework of accountability that we have created together that provides such water service to the citizens and industries in the communities we serve.

All of us take our jobs of protecting consumers' rights and assuring the provision of essential services very seriously. It has been my experience that like municipally operated water systems, private water service providers supply reliable, quality drinking water and wastewater services to all Americans regardless of age, race and socioeconomic background. I have found there to be no human rights differences between the two models of delivering water service.

If I can assist you or provide additional information please do not hesitate to give me a call.

Sincerely,

A handwritten signature in black ink that reads "John E. Howard". The signature is written in a cursive, flowing style with a large initial "J" and "H".

John E. "Butch" Howard

Chairman of the NARUC Committee on Water &

Vice Chairman of the South Carolina Public Service Commission