THE CITY OF
COLUMBUS
ANDREW J. GINTHER, MAYOR

DEPARTMENT OF
PUBLIC UTILITIES

KRISTEN ATHA
Director

February 5, 2024

FILED VIA FEDERAL eRULEMAKING PORTAL
Director Jennifer McLain
Office of Ground Water and Drinking Water
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Lead and Copper Rule Improvements (LCRI) Proposed Rule
Docket ID: EPA-HQ-OW-2022-0801 (December 6, 2023)

Dear Director McLain:

The City of Columbus, Department of Public Utilities, Division of Water (Columbus DPU) appreciates the opportunity to respond to EPA's proposed Lead and Copper Rule Improvements (LCRI). **As a preliminary matter, Columbus DPU asks for an immediate extension of the Lead and Copper Rule Revisions (LCRR) deadlines to the proposed LCRI deadlines.** Due to the announcement of LCRI upon the finalization of LCRR, utilities and states have had limited guidance and time to plan for LCRR with EPA guidance. Public water systems need assurances that timeline deferrals are codified just in case LCRI is not finalized by October 2024.

Columbus DPU's drinking water plants serve over 220 square miles in the greater Columbus area. The three drinking water plants delivered over 52 billion gallons of clean, safe drinking water last year, averaging 145 million gallons daily, to over 1.4 million residents. Columbus DPU uses a complex multi-barrier approach utilizing state of the art equipment and the latest treatment technologies to ensure all requirements of the Safe Drinking Water Act are continuously met.

Columbus DPU fully supports efforts to protect public health by reducing exposure to lead in drinking water. Columbus DPU has maintained an exceptionally low level of less than 2 ppb in our water system for at least two decades. Columbus DPU is in compliance with the Lead Copper Rule (LCR) action level of 15 ppb and will be in compliance with the proposed LCRI action level of 10 ppb. This success is longstanding and is the result of an optimized corrosion control plan that we have had in place for over 40 years. As an additional level of security against health effects of lead exposure, Columbus DPU also employs targeted public health protection. Whenever a child is identified with

elevated lead levels by our local health department, the child's home tap water is tested for lead. This targeted testing has confirmed the safety of our water system.

In systems similar to Columbus DPU where lead is well controlled, the risk of lead exposure through drinking water is minimal. However, under LCRI as proposed, Columbus DPU would be subject to the same 10-year replacement schedule as systems with far greater risks for lead exposure. Holding all public water systems to the same schedule regardless of health benefit will cause supply and labor costs to skyrocket as systems compete for the same resources to execute expedited service line replacements outside the normal capital planning and maintenance processes. LCRI as proposed also contains a number of provisions affecting technical feasibility, including proper access to private property, and the legal and technical challenges associated with this access, calculation of replacement rates, and requirements for providing filters. Finally, LCRI's notification requirements are overly complex and confusing and should be streamlined and simplified to aid public water systems in their efforts to implement this massive regulation.

I. AN ACROSS-THE-BOARD 10-YEAR TIMELINE FOR SERVICE LINE REPLACEMENT IS NOT FEASIBLE.

Columbus DPU fully supports efforts to protect public health by reducing exposure to lead in drinking water, and agrees that all lead service lines should be replaced as quickly as feasible. However, to be feasible, the timeline for replacement must be supported by an adequate health benefit. EPA over-estimated the health benefit in its feasibility analysis when it applied the 10-year simultaneous replacement rate for all water systems to water systems with optimal corrosion control. The risk of lead exposure in those populations is already extremely low; thus, the added health benefit is negligible. Additionally, EPA's analysis was flawed when it based feasibility on the fact that a few cities have accomplished 100% replacement in ten years or less. Those programs are not comparable to the simultaneous nationwide replacement requirement of LCRI. Those projects were also largely dependent on priority funding sources that will not be available to the bulk of utilities. When re-examining feasibility, EPA analysis should include a potential risk-based extension from 10 year to 20 years as it would meet the Safe Drinking Water Act's requirement for a treatment technique that "prevents known or anticipated adverse effects on the health of persons to the extent feasible."[1]

A. For low-risk utilities, a 10-year replacement timeline produces little health benefit over a longer schedule.

Columbus DPU requests that EPA allow qualifying utilities to extend their replacement schedule from 10 years to 20 years based on demonstrated low public health risk. EPA has already recognized that some systems will need additional time to remove 100% of their lead service lines and provided two opportunities to extend the deadline, based solely on the quantity or proportion of lead

[1] Safe Drinking Water Act at 1412(b)(7)(A).

service lines in a water system. We propose that EPA expand the ability to obtain an extension, based on the risk of harm. Specifically, Columbus DPU proposes that EPA offer an extended deadline for 100% replacement for up to 20 years to public water systems that have demonstrated that the risk of lead exposure from drinking water is minimal, through continuous and optimal corrosion control and consistently low lead levels lead levels below the practical quantification limit (PQL). Or, in the alternative, Columbus DPU requests the EPA allow states to issue waivers from the 10% down to 5% annual replacement based on historical 90th percentiles, sampling requirements, inventory satisfaction and economic components. This will allow for the greatest nationwide public health benefit as resources can be made available for, and strategically focused on, public water systems with the most risk.

A 10-year replacement schedule is not feasible or justified for systems like DPU that have demonstrated consistently low risk for lead exposure. In water systems with optimal corrosion control, an increased rate of replacement does not have a corresponding increase in health benefit. Communities served by water systems with successful corrosion control will not receive the health benefits cited by the proposed LCRI, despite the significant cost, because lead in drinking water is not a primary cause of elevated blood lead levels in their communities.

Columbus DPU has an established agreement to work with our local health department to ensure that all potential sources of lead exposure, including water, are analyzed during lead poisoning investigations, and that the primary pathway of lead exposure is addressed. The agreement between the departments has funded substantial lead poisoning investigation staff, support for interventions to lower blood lead levels among all children in Columbus with an elevated blood lead level, and provided general outreach to increase awareness among high-risk residents. In addition, homes where children reside with an elevated blood lead level above 10 ug/dL of blood that have lead paint hazards receive a public health order to remediate those hazards. These homes receive lead hazard control work that makes them lead-safe for future residents.

For the past seven years, water samples have been collected at each location involved in a lead poisoning investigation. Through December 2023, 816 samples were collected, only one was above the PQL of 5ug/L, and only nine were detectable above 1ug/L. Ninety-nine percent of the samples collected were non-detect. Columbus DPU is proud to say that in seven years of sampling, we have never had a case where our water caused elevated blood lead levels in our service area. In Columbus, we can confidently say the primary cause of elevated blood lead levels is not our drinking water, but is most likely due to lead paint and dust.[2]

[2] This is true for Ohio as a whole. Even though Ohio children have two times the national rate of lead exposure, Ohio Department of Health does not routinely test water because it is not necessary because most lead exposure is caused by lead-based paint. https://www.daytondailynews.com/local/ohio-kids-have-lead-in-blood-2x-national-rate-what-role-do-lead-pipes-play/6ECJMIIW4FB3NLMHF2TTXVQGEE/.

To require utilities to replace service lines at this accelerated rate imposes a significant cost to the community, and limits the flexibility of communities to address the primary cause of elevated blood lead levels in their area: lead paint. In Columbus, we have 64,725 homes that are at a very high risk for lead paint, which is one of the primary pathways for lead exposure in our city. On average, it costs $19,000 to remediate one home, which means to remediate every high-risk home in Columbus would cost approximately the same amount as replacing every lead service line. The main difference is that remediating lead paint would come with a significant health benefit to our community, unlike the replacement of lead service lines. Communities must retain flexibility to prioritize funding programs based on health benefit, so that they can address the primary pathways of lead exposure and protect public health.

B. Simultaneous replacement of all lead service lines within 10 years will increase costs exponentially for all systems.

The requirement to have every public water system replace their service lines simultaneously in 10 years is not feasible. The result will be an artificially high demand for resources—locally, regionally, and nationally. EPA acknowledges the demand but does not adequately account for how it will affect cost, supplies/labor, and funding overall, all of which inform feasibility. At Columbus DPU, where lead is already well controlled, this schedule will require additional staff and increase our budget by hundreds of millions of dollars, without providing additional health benefit. In some regions, there are simply not enough plumbers, engineers, and contractors. Add to that the nationwide demand for supplies, such as copper, steel, ductile iron, asphalt, and concrete, and the result is skyrocketing costs. Those extra costs created by this sudden increase in demand will be borne by ratepayers. EPA's cost estimates will be outdated as soon as the rule is finalized and costs begin to rise. Even with historic levels of federal grant funding, there is still far too little to cover the entire nation.

Replacing the lead service lines in Columbus DPU's system alone is estimated to cost over one billion dollars.[3] Once we add expenses for extra staffing, equipment, sampling, filters, and notifications required under LCRI, we may spend up to 1.35 billion dollars in the next 10 years meeting the requirements of the regulation. That does not include the significant increase in cost that is expected due to supply chain issues with labor and materials. This estimate does include the cost of replacing private lead service lines because, as drafted, the LCRI requires utilities to take on this responsibility. Whether we ultimately cover the private replacements or recoup our expenses through assessments on homeowners, our utility will shoulder the burden of paying the full up-front costs.

[3] Based on our current inventory, we could have up to 116,000 lead service lines in our system. Using a conservative cost estimate of $7,500 per service line (from the main to the building) indexed with a low rate of inflation over the next 10 years, the cost for service lines alone will be over 1 billion dollars.

Large-scale replacement programs also present additional complexities and challenges for public water systems. As the lead service lines are replaced, the replacement projects must incorporate the work and cost to repave roads and replace mains. There are existing budgeted capital and repair and replacement projects that must be abandoned or reworked to prioritize areas with lead service lines. With the proposed replacement rate, public water systems will be unable to address other infrastructure or water quality priorities, such as water loss in areas without lead service lines. Working on private property presents legal and financial ramifications for damages that occur inside and outside of buildings during construction.

C. Increased utility costs drive up rates and decrease affordability.

Municipal utilities do not make a profit and are funded exclusively by their ratepayers. The across-the-board 10-year requirement will burden the people that we are trying hardest to protect: the families already struggling to afford their water bills. Nationwide, residential water bills have increased nearly 50% since 2010.[4] In its affordability report this year, the US Department of Health and Human Services stated that in 1 in 20 households were disconnected from water services because of nonpayment in 2016, and in some cities, as many as 1 in 5 were disconnected.[5] Disconnection erodes household stability through liens, eviction, economic hardship, and financial stress.[6] Water insecurity disproportionately affects low-income and BIPOC communities.[7] This the same population that faces the greatest risk of lead exposure through lead paint and dust.

Given the estimated cost, our utility is bracing for a double-digit rate increase to meet the requirements of LCRI as drafted. If we spread the billion-dollar expenditure over 20 years instead of 10 years, the annual cost becomes a smaller percentage of our budget. It also allows our utility to incorporate replacements into currently budgeted work. Over 20 years, the overall cost of replacement could be offset by 400 million dollars that has already been budgeted and accounted for in our rates. But with only 10 years to absorb the impact, the offset is decreased by half. In the same time frame, our utility will face the challenge of complying with the upcoming PFAS regulations. To meet the proposed maximum contaminant level of 4 ppt for PFOA and PFOS, Columbus DPU will have to install hundreds of millions of dollars of treatment technology. This additional regulatory financial burden will be on top of the LCRI expenditures.

[4] US Department of Health and Human Services' Low-Income Water Assistance Program LIHWAP) Implementation and Impact Report, Jan. 22, 2024, https://acfhhs.foleon.com/lihwap/impact-report/water-need-in-the-us.
[5] Id.
[6] Id.
[7] Id.

II. TECHNICAL ISSUES WITH LCRI ALSO IMPACT THE FEASIBILITY OF THE RULE.

Beyond the unaccounted for inflated costs, budgetary constraints, and damaging effect on affordability, LCRI presents several technical concerns for feasibility. As drafted, its requirements push public water systems on to and into private property farther than our authority allows, which could create legal liabilities and risk utility worker safety. Provisions for calculating the rate of replacement, providing filters, and setting compliance deadlines should be amended to allow public water systems to implement replacement programs efficiently. Feasibility begs for a prohibition of price gouging and a maximum stagnation time but not for a reduction of the timeline for public education or the inclusion of a trigger level. Public water systems require the small and large tweaks below for LCRI to be feasible.

a. Limit requirements to access private property.

EPA must accept the restraints on public water systems and the limits of their authority to access private property. Typically, municipal utilities cannot spend ratepayer dollars or do work on private property. Public water systems also face difficulty replacing services in contract communities where the public water system does not have jurisdictional authority. To meet the challenge of reducing lead exposure through drinking water, public water systems are stretching their authority by establishing that lead service lines are a nuisance and that an elevated lead level at one sample could affect the entire system. But that authority is not absolute. Public water systems cannot access or control pipes that run beyond the meter. **Therefore, Columbus DPU requests that EPA remove any requirement to address interior plumbing, or, in the alternative, provide clarification that there is no requirement to address interior plumbing.**

Additionally, Columbus DPU agrees with the comment by the Association of Metropolitan Water Agencies regarding the proposed tiering of sample sites. **Columbus DPU requests that EPA confirm that composition of premise plumbing is not required related to samples or to the inventory.**

b. Redefine “service line.”

The authority of public water systems to access private property ends at the meter, and it is a regulatory overreach to require them to document the networks of our customers’ private distribution systems that exist beyond meters. Public water systems will make every reasonable effort to replace lines to the building inlet, but in many instances, water leaves the meter and runs into mains on private property. Clarification is needed regarding the use of "outlet" in the proposed definition “lead service line” in the proposed LCRI. That will ensure that public water systems are not put in a position to document and replace private distribution networks to the extent that infringes on private property rights. EPA should view “outlet” as the beginning of the distribution network that exists beyond the meter.

Columbus DPU requests that EPA amend the definition of "service line" in the final LCRI to the following definition, which was also suggested by the American Water Works Association:

> *"Service line, for the purpose of subpart I of this part only, means a portion of pipe which directly connects the community water system's water main to the building inlet. The term service lines do not include private water mains. Where a building is not present, the service line connects the water main to the outlet. Where a private main exists between the community water system main and a building inlet, associated service lines are not subject to subpart I." (§ 141.2 of LCRI)*

c. Provide exception to ban of partial replacements for worker safety.

Though rare, EPA must also recognize that entering private yard and homes can be dangerous.[8] Some residents can be combative or brandish weapons. Some homes can be structurally unsound or contain harmful substances like mold, animal feces, or illicit drugs. LCRI provides an exception to the prohibition on partial replacements when a homeowner refuses but it does not provide public water systems with an option for a partial when a home or business is unsafe to enter. **Columbus DPU requests that EPA provide an additional exemption to the ban on partials if worker safety is compromised.**

d. Allow verified non-lead service lines to count towards 10% annual rate.

As public water systems roll out their programs, the majority of replacements will be methodically planned to maximize efficiency and resources to meet the required rate of replacement. It is likely that public water systems will find some non-lead service lines that were originally marked as lead, galvanized requiring replacement, or unknown in the inventory. Those lines are factored into the required rate of replacement based on the entire inventory of lead, galvanized requiring replacement, and unknown. Currently, the proposed LCRI does not give credit toward the required removal rate of checking those lines off the inventory as not requiring replacement. The effect on public water systems is that the number of service lines that they have to replace that year will continue to grow through the year. Public water systems have finite resources and cannot react in time to an end goal that continues to move farther away. **Columbus DPU requests that EPA count toward the required rate of replacement all service lines that were identified as lead, galvanized requiring replacement, or unknown and are then verified as non-lead through the utilities' replacement program.**

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[8] Due to increases in cases of assault and battery against public utility workers, in 2022 Idaho became the 16th state to pass enhanced criminal penalty laws specifically for protecting public utility workers, and Ohio and Georgia currently have similar bills pending in their legislatures. https://idahocapitalsun.com/2022/02/23/idahos-public-utilities-report-uptick-in-worker-assaults-this-bill-would-add-penalties-for-it/; https://idahocapitalsun.com/2022/03/17/bill-creating-extra-penalties-for-assault-of-utility-workers-heading-to-gov-littles-desk/; https://ohiohouse.gov/news/republican/ohio-house-passes-utility-worker-protection-act-95107; https://metroatlantaceo.com/news/2024/02/utility-worker-protection-act-clears-georgia-house-committee/.

e. Consider a more strategic filter requirement.

Based on past experience, public water systems are concerned that sourcing of filters could become a bottleneck to meet the required rate of replacement. Supply, quality, and price gouging are huge issues for replacements at this pace. If a public water system cannot get the number of filters required in the proposed LCRI, it will become a limiting factor on removing lead service lines. **Thus, Columbus DPU requests that EPA narrow the requirement to distribute filters to instances when the filters actually are needed due to risk of lead exposure.**

There is minimal evidence that filters are needed if full replacement is completed and homes are adequately flushed. Filters are also unnecessary for water meter replacements that do not involve cutting lines because this change out is not a disturbance. Additionally, a three-month supply of filters should be adequate for homes with disturbances, especially if all lead service lines were replaced and it is paired with flushing. Finally, the requirement to provide filters to all customers within 60 days of repeated action level exceedances is unfeasible for most public water systems and impossible for many. Filters should only be required to be provided to those customers with lead or galvanized service lines or who are downstream from lead service lines after multiple action level exceedances.

f. Set timing of annual compliance tracking to year-end.

Many of the requirements in the proposed LCRI are based on an October 2027 compliance date. **For simplicity, Columbus DPU requests EPA establish compliance tracking dates based on calendar years instead of October to October.** This will correspond with the January 2028 start date for lead service line replacements, sampling, and school testing.

g. Establish price gouging protections.

The proposed LCRI will require utilities to mass purchase sampling supplies, curb boxes, copper, tools, and filters. Companies that sell these products may take this as an opportunity to force pricing at higher rates. **Columbus DPU requests that EPA establish anti-price-gouging protections for utilities using these resources for lead work.**

h. Establish maximum stagnation time for samples.

Columbus DPU requests that EPA set a maximum stagnation time of no more than 18 hours for all samples. This will mirror the requirements for schools and daycares and allow for the rejection or invalidation of samples collected under abnormal operating conditions.

i. Do not reduce the public education timeline.

EPA indicated that it would like feedback on the feasibility of completing the required public education within 30 days of the end of the tap sampling period, instead of 60 days as proposed. Public water systems cannot complete all public education within 30 days of the end of the tap sampling period, as samples may still be unanalyzed at this time. Systems have until the final day of the monitoring period to sample, and then samples must be shipped and analyzed by a laboratory. Systems may not even know they have an action level exceedance until 45 days after the monitoring period depending on laboratory turnaround time. Setting a requirement for delivery 30 days after the sample monitoring period creates an artificially compressed monitoring period due to analysis time**. Columbus DPU recommends EPA set public education requirements that include ample time for analysis, results delivery, and then implementation by the public water system.**

j. Remove trigger level.

Columbus DPU supports EPA's decision to eliminate the trigger level. The required notifications issued at the trigger level would have confused customers and ultimately undermined their faith in the safety of their water. Additionally, as we comment below regarding notifications, the complexity of implementation should be considered and minimized. This is a positive step forward.

III. SIMPLER NOTIFICATION REQUIREMENTS WILL FACILITATE A MORE SUCCESSFUL IMPLEMENTATION OF LCRI.

As public water systems contemplate how they plan to implement the regulation, they are already struggling with the complexity of the proposed LRCI especially as it relates to notifications. The timing, delivery, and content requirements must reflect the realities of risk of harm, turnaround times, unreachable persons, and consumer confidence.

a. Streamline required notifications.

Columbus DPU requests that EPA streamline and index notifications based on risk of harm to human health. LCRI contains many different types of notifications with different timelines, due dates, and people served. There are 12 different "contacts" that are required to be notified at some point. To reduce the complexity of implementing LCRI, public water systems need consistency in these notifications that allows time for processing mechanisms and is indexed to the risk customers face. The same timeline could apply for customer-initiated replacements, replacement follow-up, and required sampling, but the delivery independently indexed for customer risk. Here is an example of how it would work:

Notification	Timeline
Samples results that are non-detect	30 days
Sample results that are above PQL	10 business days
Sample results that are over the action level	3 business days, and additional delivery methods

Another example of a timeline that should be modified is the one-day notification to the owner after replacement. Once the occupant is supplied with filters and flushing guidance, there is no need for an additional notification to the owner the next day. Instead, public water systems should be able to notify the people served by water as those individuals have the most risk. If systems are required to notify the owner before restoring water service, it could result in significant delays to tenants receiving water since there are many absentee owners. Additionally, it will become a major burden for the system to immediately sink resources to track them down.

EPA should also determine the optimal quantity of notifications that is acceptable before a person is overwhelmed and disengaged. Over-notifying puts vital communications at risk of losing their effectiveness.

b. Create notification delivery best practices for notifications.

Often, public water systems have little contact information for their customers and the information they have is self-selected by the customer. It is usually limited to contact information for whomever pays the water bill. The reality is that sometimes it is impossible to notify the owner and tenant. Absentee owners are problematic for notifications, as are apartment buildings with one address and one service line.

To set utilities up for success, Columbus DPU requests that EPA establish best practices for delivery of notifications instead of relying on overly-prescriptive rules. There are times when it makes more sense to notify a resident, like when the replacement is complete and it is time to restore water, and times when the utility must track down an owner, like when obtaining an agreement for replacement. **In furtherance of this request, Columbus DPU requests that EPA change as many notifications as possible to the address of "utility affiliated contacts."** This will provide public water systems with flexibility to use the information that they have, instead of setting them up for failure. Systems will continue to do their best to ensure that everyone at risk is notified and protected without being subject to noncompliance due to unresponsive or unreliable landlords.

c. Ensure consistent messaging to preserve consumer confidence in drinking water.

Public water systems and EPA have a significant mutual interest in providing communities with treated, EPA-regulated drinking water and ensuring they do not feel like they need to rely on bottled water. Consumer confidence is absolutely key to both of us. But some of the messaging required in the LCRI could jeopardize that confidence.

Columbus DPU requests that EPA change the required consumer confidence report statement, "There is no safe level of lead in drinking water…" to "There is no known safe level of lead in drinking water." Many health-based standards exist for lead including several limits developed by the FDA and a 3.5 ug/L blood lead level by the CDC. Additionally, nutrition has an impact on lead absorption when exposed. Because replacing lead service lines does not eliminate lead in people's homes, repeating this statement creates panic and distrust of drinking water, and is in conflict with other health values that have been established for other programs.

Columbus DPU also recommends editing the consumer confidence report language required in CFR 141.154. The required health information is becoming so long that it is arduous for customers to read and is likely to be skipped**. Columbus DPU recommends removing the language regarding filters as it presents as a product endorsement, regardless of risk.** The recommendation that everyone should get a filter suggests that tap water is not safe and could erode consumer confidence. The language about the utility's responsibility to replace is unnecessary and can be removed**. Also, references to removing lead "pipes" should be changed to lead "service lines" throughout to avoid any confusion about utilities removing interior plumbing.**

IV. CONCLUSION

The requested replacement deadline extension and technical amendments get public water systems closer to what is truly feasible and, if they are based on risk of harm, will be protective of public and environmental health. Columbus DPU requests that EPA take the following steps to make LCRI feasible:

- Immediately extend the LCRR deadlines to the proposed LCRI deadlines.
- Allow qualifying utilities to extend their replacement schedule from 10 years to 20 years based on demonstrated low public health risk.
- Remove any requirement to address interior plumbing, or, in the alternative, provide clarification that there is no requirement to address interior plumbing.
- Confirm that composition of premise plumbing is not required related to samples or to the inventory.
- Amend the definition of "service line" in the final LCRI to the AWWA recommended definition.
- Provide an additional exemption to the ban on partials if worker safety is compromised.
- Count toward the required rate of replacement all service lines that were identified as lead, galvanized requiring replacement, or unknown and are then verified as non-lead through the utilities' replacement program.
- Narrow the requirement to distribute filters to instances when the filters actually are needed due to risk of lead exposure.
- Establish compliance tracking dates based on calendar years instead of October to October.

- Establish anti-price-gouging protections for utilities using these resources for lead work.
- Set a maximum stagnation time of no more than 18 hours for all samples.
- Set public education requirements that include ample time for analysis, results delivery, and then implementation by the public water system.
- Streamline and index notifications based on risk of harm to human health.
- Establish best practices for delivery of notifications instead of relying on overly-prescriptive rules.
- Change as many notifications as possible to the address of “utility affiliated contacts.”
- Change the required consumer confidence report statement, "There is no safe level of lead in drinking water…" to "There is no known safe level of lead in drinking water."
- Edit the consumer confidence report language required in CFR 141.154. Remove the language regarding filters as it presents as a product endorsement, regardless of risk. Change references to removing lead “pipes” to lead “service lines” throughout.

The City of Columbus, Department of Public Utilities, Division of Water appreciates your consideration of these comments. Should you have any questions, please contact me at jgnewsome@columbus.gov or call (614) 645-7020.

Sincerely,

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