



**ASSOCIATION OF
METROPOLITAN
WATER AGENCIES**

LEADERS IN WATER

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September 22, 2020

Mr. Andrew Sawyers
Director, Office of Wastewater Management
US Environmental Protection Agency
Washington, DC 20460

Via e-mail

Re: Docket ID No. EPA-HQ-OW-2020-0426 Proposed 2020 Financial Capability Assessment for Clean Water Act Obligations

Dear Mr. Sawyers:

The Association of Metropolitan Water Agencies (AMWA), an organization representing CEOs and general managers of the largest publicly owned drinking water utilities in the United States, welcomes the opportunity to comment on the draft Financial Capability Assessment for Clean Water Act Obligations guidance. AMWA thanks EPA for updating this guidance and respectfully requests a 30-day extension to the comment period.

Our rationale for this request is as follows:

1. Affordability is a growing issue of concern for water sector utilities around the country and as this is the first update to this guidance in over 20 years, the additional time is needed to fully review the two alternatives as well as the corresponding text, tables and worksheets presented in the draft.
2. EPA's notice includes 16 different requests for comment, and the additional time would enable us to better analyze these questions and seek insight from our members.

Thank you for consideration of our request.

Sincerely,

Diane VanDe Hei
CEO

Cc: Sonia Brubaker, EPA OWM

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