



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 3320		DATE: 4/16/2026
COMMITTEE: Conservation and Natural Resources		
TESTIFYING: <input checked="" type="checkbox"/> IN SUPPORT OF <input type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES		
WITNESS NAME		
BUSINESS/ORGANIZATION:		
WITNESS NAME: CHANCE HEPOLA		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME: MISSOURI CHAMBER OF COMMERCE		TITLE:
ADDRESS:		
CITY:		STATE: MO
EMAIL:		ZIP:
ATTENDANCE:		SUBMIT DATE: 4/16/2026 12:00 AM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		



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WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: DEANNA RHODES-WIDMER		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 4/16/2026 9:53 AM	
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WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: DIANE PRIGMORE		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 4/15/2026 11:09 AM	
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We need regulated, safe water.



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WITNESS NAME		
REGISTERED LOBBYIST:		
WITNESS NAME: MATT JESSEE		PHONE NUMBER:
REPRESENTING: MAW AMERICAN WATER		TITLE:
ADDRESS:		
CITY:		STATE: MO
EMAIL:		ZIP:
ATTENDANCE:		SUBMIT DATE: 4/16/2026 12:00 AM
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WITNESS NAME			
REGISTERED LOBBYIST:			
WITNESS NAME: RON BERRY		PHONE NUMBER: 660-537-2239	
REPRESENTING: CENTRAL STATES WATER RESOURCES		TITLE:	
ADDRESS: PO BOX 722			
CITY: JEFFERSON CITY		STATE: MO	ZIP: 65102
EMAIL:	ATTENDANCE:	SUBMIT DATE: 4/16/2026 12:00 AM	
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WITNESS NAME		
BUSINESS/ORGANIZATION:		
WITNESS NAME: SHELLEY LANE		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME: MO AMERICAN WATER		TITLE:
ADDRESS:		
CITY:		STATE: MO
EMAIL:		ZIP:
ATTENDANCE:		SUBMIT DATE: 4/16/2026 12:00 AM
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WITNESS NAME		
BUSINESS/ORGANIZATION:		
WITNESS NAME: AMBER BOX		PHONE NUMBER: 573-774-6171
BUSINESS/ORGANIZATION NAME: CITY OF WAYNESVILLE		TITLE: CITY CLERK
ADDRESS: 100 TREMONT CENTER		
CITY: WAYNESVILLE		STATE: MO
		ZIP: 65583
EMAIL: cityclerk@waynesvillemo.org	ATTENDANCE: Written	SUBMIT DATE: 4/16/2026 3:18 PM

THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.

The City of Waynesville opposes this proposed legislation because it would create unnecessary state overreach into locally managed water systems while increasing costs for Missouri families and reducing local control. Our community-owned utility is managed by leaders who are directly accountable to the residents we serve and who understand the unique needs, infrastructure, and long-term priorities of our area. This bill would give the state broad authority to restrict spending, block debt, or even assume control of local water systems based on a subjective grading system, including the potential to force consolidation or sale of community-owned utilities. Such actions would undermine the ability of municipalities to make decisions in the best interest of their citizens.

Additionally, the bill oversimplifies highly technical, science-based water compliance standards by reducing them to a single letter grade. Water systems are complex operations governed by rigorous federal and state regulations, and a simplified grade fails to reflect the full picture of system performance, investment planning, or regulatory compliance. These grades could also be misunderstood by the public as a direct measure of drinking water safety, creating confusion and unnecessary concern.

Current state and federal laws already require robust transparency, public notification, and annual Consumer Confidence Reports that provide residents with detailed information about their water quality. Further federal improvements scheduled to take effect in 2027 will make these reports even clearer and more accessible. Rather than improving transparency, this proposed state grading system would duplicate existing requirements, create confusion, and add unnecessary administrative burdens that ultimately drive up costs for ratepayers.

For these reasons, the City of Waynesville strongly opposes this legislation and supports preserving local decision-making, responsible utility management, and affordable service for Missouri families.



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WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: ANNA ZERR		PHONE NUMBER: 573-592-3161	
BUSINESS/ORGANIZATION NAME: CITY OF FULTON		TITLE: ASSISTANT SUPERINTENDENT OF UTILITIES	
ADDRESS: 18 E 4TH STREET PO BOX 130			
CITY: FUTON		STATE: MO	ZIP: 65251
EMAIL: asstfutility@fultonmo.gov	ATTENDANCE: Written	SUBMIT DATE: 4/15/2026 4:03 PM	
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I believe this bill will not be the best for Missouri families, especially in rural communities. It could force consolidation and the sale of a community that owns their own utilities, even when it is not in a failing state but to other's it may appear that way. It would increase the responsibility of DNR to add more inspections that are not needed as there are already measures in place to inspect utilities and ensure that they are within compliance. It would remove local leaders and operators from controlling their own systems and move it to a more corporate approach. Existing state and federal laws already require strong public notice and reporting, including Consumer Confidence Reports, and new federal updates taking effect in 2027 will further improve clarity and accessibility.



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WITNESS NAME		
BUSINESS/ORGANIZATION:		
WITNESS NAME: BRIAN BENDER		PHONE NUMBER: 660-385-6457
BUSINESS/ORGANIZATION NAME: PUBLIC WATER SUPPLY DISTRICT #1 OF MACON CO.		TITLE: GENERAL MANAGER
ADDRESS: 28890 HWY 63		
CITY: MACON	STATE: MO	ZIP: 63552
EMAIL: mcpwsd01@gmail.com	ATTENDANCE: Written	SUBMIT DATE: 4/15/2026 1:28 PM

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We feel this bill just doesn't make sense when we are already under federal drinking water standards by EPA which is oversights by the Missouri State Department of Natural Resources in which all info on the water system is available on the DNR website called "Drinking Water Viewer". A customer can view any or all violations and results of any testing that has been done in their water system, and once a year every customer is sent a link to the system's Consumer Confidence Report or a paper copy upon request that lists all known and regulated contaminants for that system. This bill is nothing more than over regulation of a product that is gathered, filtered, and tested right here in our own state with pride.



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WITNESS NAME		
BUSINESS/ORGANIZATION:		
WITNESS NAME: BRIAN FIFER		PHONE NUMBER: 573-588-4104
BUSINESS/ORGANIZATION NAME: CITY OF SHELBINA		TITLE: CITY SUPERINTENDENT
ADDRESS: PO BOX 646 116 E. WALNUT ST.		
CITY: SHELBINA		STATE: MO
		ZIP: 63468
EMAIL: operations@shelbinamo.gov	ATTENDANCE: Written	SUBMIT DATE: 4/15/2026 9:58 AM

THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.

This bill raises costs for Missouri families and hurts affordability of utilities. It gives the state broad authority to restrict spending, block debt, or take control of local water systems based on a subjective grading system, including the ability to force consolidation or sale of community owned utilities. This removes decision making from local leaders who are directly accountable to their communities. Reducing complex, science based compliance standards to a single letter grade strips away important context and oversimplifies how systems operate. These grades could also be misinterpreted by the public as a water safety score, creating confusion and unnecessary concern. Existing state and federal laws already require strong public notice and reporting, including Consumer Confidence Reports, and new federal updates taking effect in 2027 will further improve clarity and accessibility. A separate state grading system adds confusion, not value.



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WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: CASSANDRA LUDWIG		PHONE NUMBER: 417-237-7300	
BUSINESS/ORGANIZATION NAME: CARTHAGE WATER & ELECTRIC PLANT		TITLE: GENERAL COUNSEL & DIRECTOR OF CUSTOMER RELATIONS	
ADDRESS: 627 W. CENTENNIAL			
CITY: CARTHAGE		STATE: MO	ZIP: 64836
EMAIL: cludwig@cwep.com	ATTENDANCE: Written	SUBMIT DATE: 4/15/2026 10:34 AM	

THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.

This bill is an unfunded mandate that will not make drinking water safer, but will add costs and additional red tape to a process that is already heavily regulated. Missouri water systems are already strictly regulated by both the federal and state government. The existing rules ensure the water is properly treated and delivered and that customers are notified of any variances or violations with their local water utility. Not only would this bill introduce more (and unnecessary) burdens to water utilities in the state, but the Missouri Department of Resources is already stretched thin as well with existing resources. Passing this bill, which would require another heavy workload for MDNR, without providing any additional safety measures than what already exists, will only divert resources away from more critical functions.



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WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: DANA ULMER		PHONE NUMBER: 660-395-6847	
BUSINESS/ORGANIZATION NAME: MACON MUNICIPAL UTILITIES		TITLE: GENERAL MANAGER	
ADDRESS: 106 W BOURKE STREET			
CITY: MACON		STATE: MO	ZIP: 63552
EMAIL: dulmer@maconutilities.com	ATTENDANCE: Written	SUBMIT DATE: 4/15/2026 8:52 AM	

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o This bill raises costs for Missouri families and hurts affordability of utilities. It gives the state broad authority to restrict spending, block debt, or take control of local water systems based on a subjective grading system, including the ability to force consolidation or sale of community owned utilities. This removes decision making from local leaders who are directly accountable to their communities. Reducing complex, science based compliance standards to a single letter grade strips away important context and oversimplifies how systems operate. These grades could also be misinterpreted by the public as a water safety score, creating confusion and unnecessary concern. Existing state and federal laws already require strong public notice and reporting, including Consumer Confidence Reports, and new federal updates taking effect in 2027 will further improve clarity and accessibility. A separate state grading system adds confusion, not value.



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WITNESS NAME		
BUSINESS/ORGANIZATION:		
WITNESS NAME: DAVID WALLER		PHONE NUMBER: 573-657-5533
BUSINESS/ORGANIZATION NAME: MISSOURI RURAL WATER ASSOCIATION		TITLE: VICE PRESIDENT
ADDRESS: 901 RICHARDSON DRIVE		
CITY: ASHLAND		STATE: MO
		ZIP: 65010
EMAIL:	ATTENDANCE:	SUBMIT DATE: 4/16/2026 12:00 AM
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WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: FLOYD WOLF		PHONE NUMBER: 573-364-1572	
BUSINESS/ORGANIZATION NAME: ROLLA MUNICIPAL UTILITIES		TITLE: GENERAL MANAGER	
ADDRESS: 102 WEST 9TH STREET			
CITY: ROLLA		STATE: MO	ZIP: 65401
EMAIL: fwolf@rmurolla.org	ATTENDANCE: Written	SUBMIT DATE: 4/16/2026 9:00 AM	

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Rolla Municipal Utilities (RMU) appreciates the Missouri General Assembly’s continued focus on the safety, reliability, and transparency of public drinking water systems. As the owner and operator of a regulated municipal water system serving the City of Rolla, RMU shares the goal of ensuring public confidence in drinking water quality. However, we respectfully submit that HB 3320 is unnecessary, duplicative, and counterproductive to that goal.

Existing Regulatory Framework Already Ensures Safety and Transparency:

Public water systems in Missouri operate under an extensive and enforceable regulatory framework governed by the Safe Drinking Water Act (SDWA) and implemented by the U.S. Environmental Protection Agency (EPA) and the Missouri Department of Natural Resources (MDNR). This framework includes:

- Mandatory monitoring and reporting for over 90 regulated contaminants, including bacteriological, chemical, radiological, and emerging contaminants.
- Clearly defined Maximum Contaminant Levels (MCLs) and treatment technique requirements.
- Enforceable compliance schedules, corrective action orders, and penalties for violations.
- Immediate and tiered public notification requirements for any health-based or operational violations.

In addition, every municipal water utility is required to produce an annual Consumer Confidence Report (CCR) that details:

- Source water information
- All detected contaminants and their concentrations
- Health effects language prescribed by EPA
- Compliance status and contact information for the utility

The EPA has recently finalized significant revisions to the CCR rule, which take effect January 1, 2027. These revisions require clearer language, expanded reporting on lead and PFAS, and enhanced accessibility to ensure customers better understand their water quality. This federal effort already addresses the core transparency concerns HB 3320 seeks to solve.

Redundant Oversight Without Improving Public Health: HB 3320 suggests a new “scorecard” or grading system on water utilities that duplicates existing compliance determinations already made by MDNR and EPA. Water systems are currently evaluated based on science-based thresholds and regulatory compliance—not subjective or simplified grading metrics.

A scorecard format risks:

- Oversimplifying complex water quality data
- Conflating operational or paperwork deficiencies with actual public health risk
- Creating public confusion and erosion of trust, even when water is fully compliant and safe to drink

Water quality compliance is not a single-point-in-time condition; it is managed through continuous monitoring, system optimization, asset management, and trained operator oversight. Reducing this complexity to a grade does not improve safety, it distorts it.

Resource Diversion and Unfunded Mandate Concerns:

From an operational standpoint, HB 3320 would divert limited utility and state resources away from critical priorities, including:

- Infrastructure rehabilitation and replacement of aging water mains and treatment assets
- Workforce recruitment, certification, and retention of licensed operators
- Capital planning for resiliency, cybersecurity, and emerging regulatory requirements

The bill raises unresolved questions regarding:

- Who bears the cost of redesigning reports, inserts, or billing formats
- Staffing and training inspectors to develop and administer a grading rubric
- Additional administrative time required from both utilities and MDNR

Municipal utilities operate on ratepayer-funded budgets. Any additional administrative burden imposed without funding ultimately falls on local customers, without a corresponding improvement in water quality or service reliability.

Local Accessibility and Accountability Already Exist:

At RMU, water quality data, budgets, operational details, and compliance information are readily available through:

- Annual CCR reports
- Online postings
- Direct communication with utility staff
- In-person access at our local office

Our customers can easily obtain information with a phone call, RMU online website, or a visit to the local Rolla Municipal Utility office. Local utilities are already accountable to their governing bodies, regulators, the public they serve and themselves since employees tend to live in the cities and towns they serve.

Conclusion:

RMU respectfully urges the General Assembly to reconsider HB 3320. Rather than imposing an unfunded, duplicative reporting layer, Missouri's efforts would be better focused on:

- Investing in water infrastructure
- Supporting operator workforce development
- Allowing recent federal transparency improvements to be fully implemented

Public drinking water safety is best advanced through sustained investment, professional operation, and clear communication—not through redundant scorecards that risk misinforming the public and straining already limited resources.

Respectfully,
Floyd Wolf



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WITNESS NAME		
REGISTERED LOBBYIST:		
WITNESS NAME: FRED DREILING		PHONE NUMBER: 816-806-6335
REPRESENTING: CITY UTILITIES OF SPRINGFIELD		TITLE: LOBBYIST
ADDRESS: 1025 W 64TH TERR		
CITY: KANSAS CITY		STATE: MO
		ZIP: 64113
EMAIL: freddreilingllc@gmail.com	ATTENDANCE: In-Person	SUBMIT DATE: 4/16/2026 10:11 AM
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WITNESS NAME		
REGISTERED LOBBYIST:		
WITNESS NAME: FRED DREILING		PHONE NUMBER: 816-806-6335
REPRESENTING: ASSOCIATION OF WATER DISTRICTS		TITLE: LOBBYIST
ADDRESS: 1025 W 64TH TERR		
CITY: KANSAS CITY		STATE: MO
		ZIP: 64113
EMAIL: freddreilingllc@gmail.com	ATTENDANCE: In-Person	SUBMIT DATE: 4/15/2026 10:20 AM

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Mr. Chairman and members of the committee, for the record my name is Fred Dreiling, on behalf of the Association of Water Districts.

We are opposed to HB 3320. Our water systems are already heavily regulated under federal and state law, with strict monitoring, reporting, and public notice requirements. Those standards are being strengthened even further with new federal rules taking effect in 2027.

This bill adds a duplicative A–F grading system that doesn’t improve water quality but will increase costs and administrative burden—especially for small and rural systems. A single letter grade oversimplifies complex compliance standards and risks misleading the public into thinking it reflects water safety.

It also gives the state broad authority to intervene in locally governed systems based on that grading system. Those decisions should remain with local boards that are directly accountable to their communities.

This is added red tape with no real benefit. We respectfully ask for a no vote on HB 3320.



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WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: HOWARD BAKER		PHONE NUMBER: 660-422-2111	
BUSINESS/ORGANIZATION NAME: MISSOURI RURAL WATER ASSOCIATION		TITLE: EXECUTIVE DIRECTOR	
ADDRESS: 901 RICHARDSON DRIVE			
CITY: ASHLAND		STATE: MO	ZIP: 65010
EMAIL: hbaker@moruralwater.org	ATTENDANCE: Written	SUBMIT DATE: 4/15/2026 1:41 PM	

THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.

Missouri Rural Water Association represents over 900 water and wastewater systems, and we oppose HB3320 for several reasons:

1. The Consumer Confidence Report (CCR), that every system is required by MODNR to produce every year already, list any discrepancies that DNR has noted.
2. DNR will have to spend more money to do something that is already done, adding staff and time.
3. Systems and property owners could be harmed by an incorrect or false rating, putting the state at risk of litigation.



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WITNESS NAME		
BUSINESS/ORGANIZATION:		
WITNESS NAME: JAMIE CHITESTER		PHONE NUMBER: 573-888-5366
BUSINESS/ORGANIZATION NAME: KENNETT BOARD OF PUBLIC WORKS		TITLE: CEO
ADDRESS: 303 S. ANTHONY ST		
CITY: KENNETT		STATE: MO ZIP: 63857
EMAIL: jamiечitester@kbpw.org	ATTENDANCE: Written	SUBMIT DATE: 4/16/2026 4:27 PM

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o This bill raises costs for Missouri families and hurts affordability of utilities. It gives the state broad authority to restrict spending, block debt, or take control of local water systems based on a subjective grading system, including the ability to force consolidation or sale of community owned utilities. This removes decision making from local leaders who are directly accountable to their communities. Reducing complex, science based compliance standards to a single letter grade strips away important context and oversimplifies how systems operate. These grades could also be misinterpreted by the public as a water safety score, creating confusion and unnecessary concern. Existing state and federal laws already require strong public notice and reporting, including Consumer Confidence Reports, and new federal updates taking effect in 2027 will further improve clarity and accessibility. A separate state grading system adds confusion, not value.



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WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: JASON CHOATE		PHONE NUMBER: 417-237-7345	
BUSINESS/ORGANIZATION NAME: CARTHAGE WATER & ELECTRIC PLANT		TITLE: DIRECTOR OF WATER SERVICES	
ADDRESS: 627 W. CENTENNIAL			
CITY: CARTHAGE		STATE: MO	ZIP: 64836
EMAIL: jchoate@cwep.com	ATTENDANCE: Written	SUBMIT DATE: 4/15/2026 3:22 PM	
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This bill raises costs for Missouri families and hurts affordability of utilities. It gives the state broad authority to restrict spending, block debt, or take control of local water systems based on a subjective grading system, including the ability to force consolidation or sale of community owned utilities. This removes decision making from local leaders who are directly accountable to their communities. Reducing complex, science based compliance standards to a single letter grade strips away important context and oversimplifies how systems operate. These grades could also be misinterpreted by the public as a water safety score, creating confusion and unnecessary concern. Existing state and federal laws already require strong public notice and reporting, including Consumer Confidence Reports, and new federal updates taking effect in 2027 will further improve clarity and accessibility. A separate state grading system adds confusion, not value.



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WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: JOHN DOYLE		PHONE NUMBER: 573-774-6171	
BUSINESS/ORGANIZATION NAME: CITY OF WAYNESVILLE		TITLE: WAYNESVILLE CITY ADMINISTRATOR	
ADDRESS: 100 TREMONT CENTER			
CITY: WAYNESVILLE		STATE: MO	ZIP: 65583
EMAIL: john.doyle@waynesvillemo.org	ATTENDANCE: Written	SUBMIT DATE: 4/15/2026 9:58 AM	
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This bill would increase the costs for Missouri families and negatively impacts the affordability of utilities. It gives the state broad authority to restrict spending, block debt, or take control of local water systems based on a subjective and obscure grading system, including the ability to force consolidation or sale of community owned utilities. This removes decision making from local leaders who are directly accountable to their communities. Reducing complex, science based compliance standards to a single letter grade strips away important context and oversimplifies how systems truly operate. These grades will also be misinterpreted by the public as a water safety score, creating further confusion and unnecessary concern. Existing state and federal laws already require strong public notice and reporting, including Consumer Confidence Reports, and new federal updates taking effect in 2027 will further improve clarity and accessibility. A separate state grading system adds confusion and cost without value.



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COMMITTEE: Conservation and Natural Resources		
TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES		
WITNESS NAME		
INDIVIDUAL:		
WITNESS NAME: KEVIN WIGGINS		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 4/16/2026 1:11 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		

My name is Kevin Wiggins, and I am submitting testimony in opposition to HB 3320 as the Chair of the Missouri Chapter of the American Water Works Association.

This bill attempts to simplify drinking water system performance into a letter grade. While that may sound straightforward, it does not reflect how water systems actually function or how public health is protected on a daily basis.

Drinking water systems are dynamic; conditions like weather, equipment, pressure, and source water are constantly changing, and operators must make real-time adjustments to maintain safe water. A single letter grade cannot capture how quickly issues are identified, whether appropriate responses were taken, or the difference between minor reporting issues and true public health concerns. The bill proposes evaluating areas already addressed through existing regulatory processes, violations, operations, finances, and infrastructure by using established standards and technical expertise. A simplified grade does not meaningfully inform customers about water safety or system performance and instead risks oversimplification, confusion, and misrepresentation. It also adds administrative burden, diverting limited staff time away from operations and infrastructure improvements. HB 3320 does not strengthen oversight, it layers a subjective system onto an already robust framework. For these reasons, we respectfully ask the committee to oppose the bill.



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 3320		DATE: 4/16/2026	
COMMITTEE: Conservation and Natural Resources			
TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
REGISTERED LOBBYIST:			
WITNESS NAME: LACEY HIRSCHVOGEL		PHONE NUMBER: 573-418-8298	
REPRESENTING: MISSOURI ASSOCIATION OF MUNICIPAL UTILITIES		TITLE: DIRECTOR - ENVIRONMENTAL POLICY	
ADDRESS: 2200 MAGUIRE BLVD			
CITY: COLUMBIA		STATE: MO	ZIP: 65201
EMAIL: lacey.r.smith@gmail.com	ATTENDANCE: In-Person	SUBMIT DATE: 4/16/2026 12:27 PM	

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The Missouri Association of Municipal Utilities strongly opposes HB 3320. While we appreciate the intent to improve transparency and accountability, this bill does not achieve that goal. Instead, it oversimplifies a highly technical and regulated industry into a single letter grade, creating unintended consequences such as customer confusion, unnecessary alarm, and negative impacts on economic development. It also risks undervaluing the highly trained professionals responsible for delivering safe drinking water every day.

Transparency Already Exists Under Current Law

Drinking water systems are already subject to extensive federal and state oversight under the Safe Drinking Water Act, Missouri’s Safe Drinking Water regulations, the America’s Water Infrastructure Act, and the Cybersecurity Act. These laws require robust, ongoing transparency to the public.

For example:

- Community water systems must provide annual Consumer Confidence Reports (CCR), which disclose water quality data, violations, and health information.
- The U.S. Environmental Protection Agency has already strengthened CCR requirements, with updated rules taking effect January 1, 2027, to improve clarity, readability, and reporting on emerging contaminants like lead and PFAS.
- Existing public notification requirements mandate immediate communication to customers when there is any risk to public health, including boil advisories or orders.

In practice, many Missouri communities go beyond these requirements by including plain-language explanations and system updates. Great examples of these are the City of Columbia, City of Carthage, and City Utilities of Springfield. Additionally, utility records are accessible through local offices and the Missouri Sunshine Law.

HB 3320 Creates Duplication and Administrative Burden

HB 3320 introduces duplicative reporting requirements that will divert limited staff time and financial resources away from core operations and infrastructure improvements. These burdens will impact both local utilities and the Missouri Department of Natural Resources, without providing meaningful new information to customers.

The Proposed Grading System Introduces Subjectivity

The bill proposes a letter-grade system based on broad categories such as “performance” and “sustainability.” However, drinking water compliance is currently based on objective, enforceable standards.

Introducing a grading system adds subjectivity to an otherwise data-driven regulatory framework. It will be difficult to ensure consistency across inspectors and systems, particularly given the complexity

and variability of water sources, infrastructure age, and operational challenges across Missouri communities.

To conclude, HB 3320 does not meaningfully improve transparency or accountability. Instead, it risks:

- **Oversimplifying complex systems into misleading letter grades**
- **Creating unnecessary public concern**
- **Diverting resources away from system improvements**
- **Introducing subjectivity into an objective regulatory framework**

Missouri's drinking water systems are already transparent, accountable, and highly regulated. We respectfully urge the committee to oppose HB 3320. Thank you for your time and service.



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WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: LARRY LACY, PE		PHONE NUMBER: 573-218-8266	
BUSINESS/ORGANIZATION NAME: CITY OF FARMINGTON		TITLE: PUBLIC WORKS DIRECTOR	
ADDRESS: 110 W COLUMBIA			
CITY: FARMINGTON		STATE: MO	ZIP: 63640
EMAIL: llacy@farmington-mo.gov	ATTENDANCE: Written	SUBMIT DATE: 4/15/2026 2:34 PM	

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This bill raises costs for Missouri families and hurts affordability of utilities. It gives the state broad authority to restrict spending, block debt, or take control of local water systems based on a subjective grading system, including the ability to force consolidation or sale of community owned utilities. This removes decision making from local leaders who are directly accountable to their communities. Reducing complex, science based compliance standards to a single letter grade strips away important context and oversimplifies how systems operate. These grades could also be misinterpreted by the public as a water safety score, creating confusion and unnecessary concern. Existing state and federal laws already require strong public notice and reporting, including Consumer Confidence Reports, and new federal updates taking effect in 2027 will further improve clarity and accessibility. A separate state grading system adds confusion, not value.



MISSOURI HOUSE OF REPRESENTATIVES
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TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES		
WITNESS NAME		
BUSINESS/ORGANIZATION:		
WITNESS NAME: LLOYD D. WELLS		PHONE NUMBER: 417-967-3348
BUSINESS/ORGANIZATION NAME: CITY OF HOUSTON		TITLE: CITY ADMINISTRATOR
ADDRESS: 601 S. GRAND AVE		
CITY: HOUSTON		STATE: MO
		ZIP: 65483
EMAIL: lwells@houstonmo.org	ATTENDANCE: Written	SUBMIT DATE: 4/15/2026 8:23 AM

THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.

This bill raises costs for Missouri families and hurts affordability of utilities. It gives the state broad authority to restrict spending, block debt, or take control of local water systems based on a subjective grading system, including the ability to force consolidation or sale of community owned utilities. This removes decision making from local leaders who are directly accountable to their communities. Reducing complex, science based compliance standards to a single letter grade strips away important context and oversimplifies how systems operate. These grades could also be misinterpreted by the public as a water safety score, creating confusion and unnecessary concern. Existing state and federal laws already require strong public notice and reporting, including Consumer Confidence Reports, and new federal updates taking effect in 2027 will further improve clarity and accessibility. A separate state grading system adds confusion, not value.



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TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: MARK PARKER		PHONE NUMBER: 573-337-5549	
BUSINESS/ORGANIZATION NAME: CITY OF ST. ROBERT		TITLE: ASSISTANT CITY ADMINISTRATOR, CITY OF ST. ROBERT	
ADDRESS: 194 EASTLAWN AVE, SUITE A			
CITY: ST. ROBERT		STATE: MO	ZIP: 65584
EMAIL: assistantcityadmin@saintrobert.com	ATTENDANCE: Written	SUBMIT DATE: 4/15/2026 2:10 PM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

This bill would be very detrimental to our City as it will raise costs for Missouri families and will cause utilities to raise, hurting the affordability of utilities across Missouri. It will give the state authority to restrict spending and could force consolidation or sale of community utilities because the state would have the authority to take over control. These grades could also be misinterpreted by the public as a water safety score, creating confusion and unnecessary concern.



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TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES		
WITNESS NAME		
REGISTERED LOBBYIST:		
WITNESS NAME: MICHAEL GROTE		PHONE NUMBER: 573-256-7060
REPRESENTING: CITY UTILITIES OF SPRINGFIELD		TITLE:
ADDRESS: P.O. BOX 638		
CITY: COLUMBIA		STATE: MO
		ZIP: 65203
EMAIL: Mike@ga2.us	ATTENDANCE: In-Person	SUBMIT DATE: 4/16/2026 3:26 PM

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The EPA is already addressing this issue and duplicative and inconsistent rules can be burdensome.

Public information on these issues is already available

These rules will be duplicative and do no serve the purpose of protecting Missourians they would exist to position certain water systems at risk and damage access by Missourians to affordable water throughout the state



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WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: PETER DAMES		PHONE NUMBER: 573-769-6001	
BUSINESS/ORGANIZATION NAME: CITY OF PALMYRA		TITLE: MANAGER OF ELECTRIC DEPT	
ADDRESS: 301S MAIN ST			
CITY: PALMYRA		STATE: MO	ZIP: 63461
EMAIL: pdames@palmyramo.gov	ATTENDANCE: Written	SUBMIT DATE: 4/16/2026 8:37 AM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

This bill raises costs for Missouri families and hurts affordability of utilities. It gives the state broad authority to restrict spending, block debt, or take control of local water systems based on a subjective grading system, including the ability to force consolidation or sale of community owned utilities. This removes decision making from local leaders who are directly accountable to their communities. Reducing complex, science based compliance standards to a single letter grade strips away important context and oversimplifies how systems operate. These grades could also be misinterpreted by the public as a water safety score, creating confusion and unnecessary concern. Existing state and federal laws already require strong public notice and reporting, including Consumer Confidence Reports, and new federal updates taking effect in 2027 will further improve clarity and accessibility. A separate state grading system adds confusion, not value.



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WITNESS NAME		
BUSINESS/ORGANIZATION:		
WITNESS NAME: PITTS LESESNE		PHONE NUMBER: 573-201-8455
BUSINESS/ORGANIZATION NAME: CITY OF CUBA, MO		TITLE: MAYOR OF CUBA MO
ADDRESS: 292 N. SMITH ST		
CITY: CUBA		STATE: MO
		ZIP: 65453
EMAIL: pittslesesne@outlook.com	ATTENDANCE: Written	SUBMIT DATE: 4/16/2026 6:02 AM

THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.

This bill raises costs for Missouri families and hurts affordability of utilities. It gives the state broad authority to restrict spending, block debt, or take control of local water systems based on a subjective grading system, including the ability to force consolidation or sale of community owned utilities. This removes decision making from local leaders who are directly accountable to their communities. Reducing complex, science based compliance standards to a single letter grade strips away important context and oversimplifies how systems operate. These grades could also be misinterpreted by the public as a water safety score, creating confusion and unnecessary concern. Existing state and federal laws already require strong public notice and reporting, including Consumer Confidence Reports, and new federal updates taking effect in 2027 will further improve clarity and accessibility. A separate state grading system adds confusion, not value.



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WITNESS NAME		
BUSINESS/ORGANIZATION:		
WITNESS NAME: REGINA LONG		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME: CITY OF MEMPHIS		TITLE: CITY ADMINISTRATOR
ADDRESS: 125 W. JEFFERSON		
CITY: MEMPHIS		STATE: MO
		ZIP: 63555
EMAIL: reginal@cityofmemphismo.com	ATTENDANCE: Written	SUBMIT DATE: 4/16/2026 6:00 PM

THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.

This bill raises costs for Missouri families and hurts affordability of utilities. It gives the state broad authority to restrict spending, block debt, or take control of local water systems based on a subjective grading system, including the ability to force consolidation or sale of community owned utilities. This removes decision making from local leaders who are directly accountable to their communities. Reducing complex, science based compliance standards to a single letter grade strips away important context and oversimplifies how systems operate. These grades could also be misinterpreted by the public as a water safety score, creating confusion and unnecessary concern. Existing state and federal laws already require strong public notice and reporting, including Consumer Confidence Reports, and new federal updates taking effect in 2027 will further improve clarity and accessibility. A separate state grading system adds confusion, not value.



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TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES		
WITNESS NAME		
REGISTERED LOBBYIST:		
WITNESS NAME: RICHARD SHEETS		PHONE NUMBER: 573-635-9134
REPRESENTING: MISSOURI MUNICIPAL LEAGUE		TITLE:
ADDRESS: 1727 SOUTHRIDGE DR.		
CITY: JEFFERSON CITY		STATE: MO
		ZIP: 65109
EMAIL:	ATTENDANCE:	SUBMIT DATE: 4/16/2026 12:00 AM
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MISSOURI HOUSE OF REPRESENTATIVES
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TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: SARAH BERRY		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 4/16/2026 7:45 AM	

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HB 3320 establishes a statewide grading system for community water systems and attaches significant legal and financial consequences to those grades, including state-imposed financial control, debt restrictions, and potential court-appointed receivership.

While framed as “transparency and accountability,” the structure of this bill raises serious legal, operational, and fiscal concerns.

First, the bill creates a state-imposed classification system (A–F) that triggers punitive consequences without sufficient statutory precision.

**The grading criteria rely on:
 undefined weighting of violations
 newly created financial “sustainability” metrics
 and agency-developed scoring rules not contained in statute**

This delegates broad discretionary authority to the Department without clear legislative standards, raising concerns regarding arbitrary or inconsistent application.

Second, the bill attaches substantial deprivation of local control and property interests to those grades.

**A “D” or “F” designation can result in:
 restriction on lawful expenditure of locally generated revenue
 prohibition on incurring debt unrelated to state-approved plans
 state-directed financial oversight
 and court-ordered receivership**

These consequences are not minor regulatory adjustments—they are intrusions into local governance and financial autonomy.

Yet they are triggered by an administrative grading system that is not itself subject to clear statutory safeguards.

Third, the bill creates due process concerns.

Although an appeal process is referenced, the statute does not:
define evidentiary standards
ensure meaningful pre-deprivation review
or limit enforcement actions pending appeal

At the same time, the consequences—particularly financial restrictions and receivership—can take effect based on those grades.

When government action restricts the use of public funds or transfers operational control, procedural protections must be clear, robust, and defined in statute.

They are not here.

Fourth, the bill creates internal contradictions with its own fiscal structure.

The fiscal note explicitly acknowledges:
potential revenue loss to state funds when systems cannot make payments
unknown but potentially significant database and administrative costs
and the addition of multiple state personnel to administer the system

In other words, the bill:
restricts local systems' ability to meet financial obligations
while simultaneously increasing state administrative costs

This is not a neutral reform—it introduces measurable financial instability into both local systems and state-managed funds.

Fifth, the bill's enforcement mechanism raises serious legal exposure.

Authorizing courts to impose receivership or compel system consolidation based on an administrative grade—particularly where that grade is derived from discretionary rulemaking—creates a foreseeable pathway to litigation.

At minimum, this structure invites challenges related to:
improper delegation of legislative authority
due process deficiencies
and unlawful interference with local governmental functions

Finally, the bill applies a one-size-fits-all grading framework across highly variable systems, including:
small rural systems
nonprofit systems
municipal utilities
and private water corporations

Despite this variation, the statute mandates uniform grading and consequences without adequately accounting for scale, resource limitations, or infrastructure age.

Transparency is a valid policy goal.

But transparency mechanisms must be:
clearly defined
consistently applied
and proportionate to the consequences they trigger

HB 3320 instead creates a system where administrative scoring decisions drive significant legal and financial outcomes without sufficient statutory guardrails.

If the state intends to impose consequences of this magnitude—financial control, debt restriction, and receivership—those consequences must be grounded in clearly defined statutory standards, not a discretionary grading framework.

For these reasons, I respectfully urge a “Do Not Pass.”



MISSOURI HOUSE OF REPRESENTATIVES
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COMMITTEE: Conservation and Natural Resources			
TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: SKIP SCHALLER		PHONE NUMBER: 417-235-3763	
BUSINESS/ORGANIZATION NAME: CITY OF MONETT		TITLE: UTILITIES SUPERINTENDENT, CITY OF MONETT	
ADDRESS: 217 5TH STREET			
CITY: MONETT		STATE: MO	ZIP: 65708
EMAIL: skipschaller@monettmo.gov	ATTENDANCE: Written	SUBMIT DATE: 4/15/2026 9:25 AM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

I oppose this bill because it doesn't add anything to improve the quality of service we as a city provide but does add more cost and administrative burdens. MoDNR already does inspections on the system, has extensive reporting requirements, the CCR is getting updated to provide more transparency to citizens. The scoring on this system will cause issues with people understanding what it means. You could have older infrastructure that is safe but scores low, people see a low score and assume the water is unsafe. MoDNR does a good job regulating and enforcing rules and state/federal law governing public water systems. This bill will raise costs for end users, and gives the state broad authority over spending, debt issues and gives them authority to take over systems based on a arbitrary letter grading system.



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WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: TARA STRAIN		PHONE NUMBER: 573-682-2139	
BUSINESS/ORGANIZATION NAME: CITY OF CENTRALIA		TITLE: CITY ADMINISTRATOR	
ADDRESS: 114 S. ROLLINS ST			
CITY: CENTRALIA		STATE: MO	ZIP: 65240
EMAIL: tara@centraliamogov	ATTENDANCE: Written	SUBMIT DATE: 4/15/2026 3:32 PM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

I am writing to express strong opposition to HB 3320, which would require the Missouri Department of Natural Resources (DNR) to assign A–F grades to public water systems.

While transparency and public confidence in drinking water are critically important, HB 3320 does not advance those goals. Instead, it creates unnecessary administrative burdens, increases costs, and diverts limited resources away from the work that actually improves water quality and system reliability.

Missouri’s drinking water systems are already subject to rigorous federal and state oversight. Utilities must comply with extensive regulations under the Safe Drinking Water Act, and they are required to provide annual Consumer Confidence Reports (CCR) to customers. These reports are being further enhanced through recent EPA updates, which take effect January 1, 2027, and will improve clarity, expand reporting requirements, and provide additional information on emerging contaminants such as lead and PFAS. These improvements are a more effective and targeted approach to transparency than a simplified grading system.

In addition, current regulations already mandate immediate public notification of any violations that could impact public health. Municipal utilities maintain accessible records on water quality, operations, and finances, and our residents can readily obtain information through direct communication with their local utility.

HB 3320 would impose a duplicative “scorecard” system that does not reflect the complexity of water system operations. Reducing compliance and performance to a single letter grade risks misleading the public and undermining trust, rather than enhancing it. More importantly, it would require additional reporting, staffing, and administrative effort from both local utilities and DNR—without providing new funding to support these mandates.

At a time when communities across Missouri are working to address aging infrastructure, workforce shortages, and increasing regulatory requirements, our focus should remain on meaningful investments and practical solutions. HB 3320 moves us in the opposite direction by adding red tape without improving water safety.

For these reasons, I respectfully urge you to oppose HB 3320.

Thank you for your consideration and for your continued support of Missouri's public water systems.



MISSOURI HOUSE OF REPRESENTATIVES
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TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input type="checkbox"/> IN OPPOSITION TO <input checked="" type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: DAVID MCELFRSH		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 4/16/2026 8:52 AM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

Transparency in water systems of all types is needed, and is currently in place through the department and EPA. A "grading system" to exploit a community water system further seems unproductive. Consumer Confidence Report publicly shows water quality. Potential threats to communities, purchasers, or environmental need to be identified beyond the previous years testing, but not as a grading system. It would be more effective and productive to protect water systems during upgrades making sure funds are being allocated efficiently. An engineer can spec a grant project for upgrades and compliance without much restriction. If a water system does not have an advocate doing their own research it turns into a waste of long term funds. Aging infrastructure is a major issue, and a grading system putting redundant attention into areas as a penalty takes from attention towards progress of improvements.



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WITNESS NAME			
REGISTERED LOBBYIST:			
WITNESS NAME: SARAH WOOD MARTIN		PHONE NUMBER: 573-239-0887	
REPRESENTING: MISSOURIANS FOR A BALANCED ENERGY FUTURE		TITLE:	
ADDRESS: 903 WEST HIGH STREET			
CITY: JEFFERSON CITY		STATE: MO	ZIP: 65109
EMAIL:	ATTENDANCE:	SUBMIT DATE: 4/16/2026 12:00 AM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			