



EPCOR Water Services Inc.  
10423-101 Street NW  
Edmonton, Alberta T5H 0E8  
[epcor.com](http://epcor.com)

January 14, 2021

Mr. Chris McMillan  
Secretary to the Comptroller of Water Rights  
Utility Regulation Section  
Water Management Branch  
Ministry of Forests, Lands, Natural Resource Operations and Rural Development  
PO Box 9340 Stn Provincial Government  
Victoria, BC V8W 9M1

Dear Mr. McMillan:

Re: **EPCOR Water (West) Inc.  
2021-2023 Revenue Requirements and Rates Application  
Information Requests**

In accordance with the directions set out on December 4, 2020, EPCOR Water (West) Inc. ("EWW") hereby files its responses to the information requests received with reference number 7719. EWW's responses will be posted on its website at [www.epcor.com/frenchcreek](http://www.epcor.com/frenchcreek) as soon as possible.

Please contact me at (780) 919-4424 if you have any questions.

Sincerely,

Camille Jasper-Fabiyi  
Senior Manager, Regulatory  
EPCOR Water Services Inc.

Attachments

cc: Ms. Elena Oliphant  
Chief Financial Advisor, Utility Regulation Section  
Water Management Branch  
Ministry of Forests, Lands, Natural Resource Operations and Rural Development



**1.0 Reference: Application, Cover Letter, para. 4**

**Explanation:** EWW states that: “EWW will issue a notice of application to its customers, providing an opportunity for interveners to register in the regulatory proceeding and giving at least 30 days for customers to submit any comments on the Application to the Comptroller’s office. At that time, EWW will also have the entire Application posted to our website and a hard copy will be available for review at our office. EWW will send a draft of the notice to the Comptroller’s office for review.”

**Request:**

1.1 Please provide a copy of the final Notice.

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**Response to request 1.1:**

The notice is included as EWW-WURS-01-Attachment 1.

EWW has also posted the following information related to the 2021-2023 Revenue Requirements and Rates Application on its website at <https://www.epcor.com/products-services/water/rate-applications/Pages/2021-2023-rate-application.aspx>.



2.0 Reference: Application, pg. 1, Table 1.1-1

Explanation: The Table provides the proposed water rates

Request:

2.1 For ease of reference, please include the 2020 rates on the Table.

Response to request 2.1:

Table 1.1-1  
Proposed Water Rates  
2021-2023  
(\$)

	A 2020	B 2021	C 2022	D 2023
<b>Base Rates</b>				
1 Residential	46.30	43.45	43.45	43.45
2 Multi-Residential	42.23	39.53	39.53	39.53
3 Commercial	40.34	38.39	38.39	38.39
<b>Consumption Rates</b>				
<b>Residential</b>				
4 12-75 cubic meters	N/A	1.93	1.93	1.93
5 15-75 cubic meters	1.93	N/A	N/A	N/A
6 > 75 cubic meters	1.93	1.93	1.93	1.93
<b>Multi-Residential</b>				
7 12-75 cubic meters	N/A	1.93	1.93	1.93
8 15-75 cubic meters	1.93	N/A	N/A	N/A
9 > 75 cubic meters	1.93	1.93	1.93	1.93
<b>Commercial</b>				
10 12-75 cubic meters	N/A	0.96	0.96	0.96
11 15-75 cubic meters	1.93	N/A	N/A	N/A
12 > 75 cubic meters	1.93	0.96	0.96	0.96
13 Fire Hydrants (annual)	582.84	582.84	582.84	582.84
14 Standpipes (annual)	233.14	233.14	233.14	233.14
15 Availability of Service Charge (annual)	388.96	365.01	365.01	365.01



**3.0 Reference: Application, pg. 4, para. #7, Conservation Rates**

**Explanation:** EWW explains that for its second alternative: “This alternative was discussed at the May 2020 French Creek CAP meeting and EWW received feedback that with uncertainty related to the COVID-19 pandemic it may not be the best time to implement this type of rate structure and the associated communication strategy. EWW agreed, and this alternative was not pursued.”

**Request:**

3.1 Please advise whether EWW plans to raise this option as part of its 2024 rate application? If not, why?

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**Response to request 3.1:**

EWW does not necessarily plan to implement a new rate structure in its 2024-2026 rate application. Instead, EWW will evaluate the effects of the rate structure changes proposed in the 2021-2023 Rates Application before determining whether alternative rate structures are required to encourage water conservation in French Creek.



**4.0 Reference: Application, pg. 4, para. # 9**

**Explanation:** “As shown in Table 1.1.2-1 average residential customers use approximately 11 m<sup>3</sup> in colder months, which represents indoor consumption, with consumption increase to between 20 m<sup>3</sup> and 32 m<sup>3</sup> in warmer months, as outdoor usage increases. It is common practice in the water industry to align a utilities first consumption tier with basic indoor household water usage<sup>2</sup>.”

**Request:**

4.1 Why did EWW choose 12 cu. m for base consumption for Residential and 10 for Multi-Residential, rather than 11 cu. m?

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**Response to request 4.1:**

For clarification EWW is proposing to set base consumption at 12m<sup>3</sup> for all customer classes. As discussed, in section 1.1.1 of EPCOR Water (West) Inc. –2021-2023 Revenue Requirements and Rates Application EWW analyzed the customer impacts of changing base consumption under multiple scenarios.

As shown in Table EWW-WURS-01-4.1-1, with base consumption set at 12m<sup>3</sup> the average customer will experience a bill increase of 2.5% between 2020 and 2023 (row 8, column D). Table EWW-WURS-01-4.1-2 shows that the average customer would experience a bill increase of 3.9% between 2020 and 2023 (row 8, column D), with base consumption set at 11m<sup>3</sup>. EWW is proposing 12m<sup>3</sup> for base consumption in order to provide an appropriate balance between incenting water conservation while minimizing bill increases.



**Table EWW-WURS-01-4.1-1**  
**(Table 1.2-2) Base Consumption 12m<sup>3</sup>**  
**Monthly Bill for Residential Customer (Average 20 m<sup>3</sup>/month)**  
**2021-2023 (\$/customer/month)**

	A 2020	B 2021F	C 2022F	D 2023F
<b>Consumption Charge:</b>				
1 Minimum	46.30	43.45	43.45	43.45
2 Additional (per m <sup>3</sup> over)	9.65	15.44	15.44	15.44
<b>Rate Rider:</b>				
3 Minimum	-	(3.48)	(2.35)	(1.13)
4 Additional (per m <sup>3</sup> over)	-	(1.20)	(0.80)	(0.40)
<b>5 Total Monthly Bill</b>	<b>55.95</b>	<b>54.21</b>	<b>55.74</b>	<b>57.36</b>
6 Change (\$)		(1.74)	1.53	1.62
7 Change (%)		-3.1%	2.8%	2.9%
<b>8 Cumulative Change (%)</b>		<b>-3.1%</b>	<b>-0.4%</b>	<b>2.5%</b>

**Table EWW-WURS-01-4.1-2**  
**Base Consumption 11m<sup>3</sup>**  
**Monthly Bill for Residential Customer (Average 20 m<sup>3</sup>/month) 2021-2023**  
**(\$/customer/month)**

	A 2020	B 2021F	C 2022F	D 2023F
<b>Consumption Charge:</b>				
1 Minimum	46.30	42.34	42.34	42.34
2 Additional (per m <sup>3</sup> over)	9.65	17.37	17.37	17.37
<b>Rate Rider:</b>				
3 Minimum	-	(3.39)	(2.29)	(1.10)
4 Additional (per m <sup>3</sup> over)	-	(1.35)	(0.90)	(0.45)
<b>5 Total Monthly Bill</b>	<b>55.95</b>	<b>54.97</b>	<b>56.52</b>	<b>58.16</b>
6 Change (\$)		(0.98)	1.55	1.64
7 Change (%)		-1.8%	1.0%	3.9%
<b>8 Cumulative Change (%)</b>		<b>-1.8%</b>	<b>1.0%</b>	<b>3.9%</b>



**5.0 Reference: Application, pg. 6, Tables 1.2-1 to 1.2-3, Monthly Bills**

**Explanation:** EWW shows the residential monthly bills including rate rider refunds.

**Request:**

- 5.1 Please show the % changes in rates exclusive of rate rider refunds.
- 5.2 Please show the calculations that lead to the reduction in the basic charge from \$46.30 to \$43.45.

**Response to request 5.1:**

Tables EWW-WURS-01-5.1-1 to EWW-WURS-01-5.1-3 show the percentage changes in residential bills exclusive of rate rider refunds.

**Table EWW-WURS-01-5.1-1**  
**(Table 1.2-1)**  
**Monthly Bill for Residential Customer (Minimum 10 m<sup>3</sup>/month)**  
**2021-2023**  
**(\$/customer/month)**

	A 2020	B 2021F	C 2022F	D 2023F
<b>Consumption Charge:</b>				
1 Minimum	46.30	43.45	43.45	43.45
2 Additional (per m <sup>3</sup> over)	-	-	-	-
<b>3 Monthly Bill Before Rate Rider</b>	<b>46.30</b>	<b>43.45</b>	<b>43.45</b>	<b>43.45</b>
4 Change (\$)		(2.85)	-	-
5 Change (%)		-6.1%	0.0%	0.0%
<b>Rate Rider:</b>				
6 Minimum	-	(3.48)	(2.35)	(1.13)
7 Additional (per m <sup>3</sup> over)	-	-	-	-
<b>8 Total Monthly Bill</b>	<b>46.30</b>	<b>39.97</b>	<b>41.10</b>	<b>42.32</b>
9 Change (\$)		(6.33)	1.13	1.22
10 Change (%)		-13.7%	2.8%	3.0%
11 Cumulative Change (%)		-13.7%	-11.2%	-8.6%



**Table EWW-WURS-01-5.1-2**  
**(Table 1.2-2)**

**Monthly Bill for Residential Customer (Average 20 m<sup>3</sup>/month) 2021-2023**  
**(\$/customer/month)**

	A 2020	B 2021F	C 2022F	D 2023F
<b>Consumption Charge:</b>				
1 Minimum	46.30	43.45	43.45	43.45
2 Additional (per m <sup>3</sup> over)	9.65	15.44	15.44	15.44
<b>3 Monthly Bill Before Rate Rider</b>	<b>55.95</b>	<b>58.89</b>	<b>58.89</b>	<b>58.89</b>
4 Change (\$)		2.94	-	-
5 Change (%)		5.3%	0.0%	0.0%
<b>Rate Rider:</b>				
3 Minimum	-	(3.48)	(2.35)	(1.13)
4 Additional (per m <sup>3</sup> over)	-	(1.20)	(0.80)	(0.40)
<b>5 Total Monthly Bill</b>	<b>55.95</b>	<b>54.21</b>	<b>55.74</b>	<b>57.36</b>
6 Change (\$)		(1.74)	1.53	1.62
7 Change (%)		-3.1%	2.8%	2.9%
8 Cumulative Change (%)		-3.1%	-0.4%	2.5%

**Table EWW-WURS-01-5.1-3**  
**(Table 1.2-3)**

**Monthly Bill for Residential Customer (High 30 m<sup>3</sup>/month)**  
**2021-2023**  
**(\$/customer/month)**

	A 2020	B 2021F	C 2022F	D 2023F
<b>Consumption Charge:</b>				
1 Minimum (up to 15 m <sup>3</sup> )	46.30	43.45	43.45	43.45
2 Additional (per m <sup>3</sup> over)	28.95	34.74	34.74	34.74
<b>3 Monthly Bill Before Rate Rider</b>	<b>75.25</b>	<b>78.19</b>	<b>78.19</b>	<b>78.19</b>
4 Change (\$)		2.94	-	-
5 Change (%)		3.9%	0.0%	0.0%
<b>Rate Rider:</b>				
3 Minimum (up to 15 m <sup>3</sup> )	-	(3.48)	(2.35)	(1.13)
4 Additional (per m <sup>3</sup> over)	-	(2.70)	(1.80)	(0.90)
<b>5 Total Monthly Bill</b>	<b>75.25</b>	<b>72.01</b>	<b>74.04</b>	<b>76.16</b>
6 Change (\$)		(3.24)	2.03	2.12
7 Change (%)		-4.3%	2.8%	2.9%
8 Cumulative Change (%)		-4.3%	-1.6%	1.2%





**Response to request 5.2:**

The basic charges were reduced so EWW will collect the same amount of revenue from each customer class that it would have collected if the base consumption was not changed. The calculations that lead to the reduction in the basic charge from \$46.30 to \$43.45, are detailed in the following four steps:

1. The 2021 to 2023 revenue forecast was calculated using 2020 rates and base consumption at 15m<sup>3</sup>. As shown in Table EWW-WURS-01-5.2-1, with no changes to rate structure EWW forecast to collect \$4,065 thousand from the residential customer class over the 2021 to 2023 period. This calculation was provided in Financial Schedule 1.3, submitted as part of the Application.

**Table EWW-WURS-01-5.2-1**  
**Residential Revenue Forecast**  
**At 2020 Rates and Base Consumption at 15m<sup>3</sup>**

	A 2021	B 2022	C 2023	D Total
1 Customer Forecast (Financial Schedule 1.1)	1,828	1,845	1,861	5,534
2 Consumption Forecast (Financial Schedule 1.1)				
3 First 15 cubic metres plus (m <sup>3</sup> )	254,272	256,567	258,876	769,716
4 Between 15 and 75 cubic metres (m <sup>3</sup> )	156,158	157,567	158,985	472,710
5 Over 75 cubic metres (m <sup>3</sup> )	13,399	13,520	13,641	40,560
6 <b>Total Consumption (m3)</b>	<b>423,829</b>	<b>427,655</b>	<b>431,503</b>	<b>1,282,987</b>
7 <b>Existing Rates</b>				
8 Monthly Fixed Charge (\$)	46.30	46.30	46.30	
9 For each cubic meter between 12 and 75 cubic meters (\$/m <sup>3</sup> )	1.93	1.93	1.93	
10 For each cubic meter over 75 cubic meters (\$/m <sup>3</sup> )	1.93	1.93	1.93	
11 <b>Revenue Forecast</b>				
12 Monthly Fixed Charge (\$)	1,015,637	1,024,804	1,034,027	3,074,468
13 For each cubic meter between 15 and 75 cubic meters (\$)	301,385	304,105	306,842	912,331
14 For each cubic meter over 75 cubic meters (\$)	25,860	26,093	26,328	78,281
15 <b>Total Revenue Forecast (\$)</b>	<b>1,342,881</b>	<b>1,355,002</b>	<b>1,367,197</b>	<b>4,065,080</b>

2. The 2021 to 2023 revenue forecast was re-calculated using 2020 rates with base consumption at 12m<sup>3</sup>. As shown in Table EWW-WURS-01-5.2-2, the change in base consumption would result in EWW collecting \$4,254 thousand from the residential customer class, if the basic charge was not reduced.



**Table EWW-WURS-01-5.2-2**  
**Residential Revenue Forecast**  
**At 2020 Rates and Base Consumption at 12m<sup>3</sup>**

	A 2021	B 2022	C 2023	D Total
1 Customer Forecast (Financial Schedule 1.1)	1,828	1,845	1,861	5,534
2 Consumption Forecast (Financial Schedule 1.1)				
3 First 12 cubic metres plus (m <sup>3</sup> )	221,917	223,920	225,935	671,773
4 Between 12 and 75 cubic metres (m <sup>3</sup> )	188,513	190,215	191,926	570,654
5 Over 75 cubic metres (m <sup>3</sup> )	13,399	13,520	13,641	40,560
6 <b>Total Consumption (m<sup>3</sup>)</b>	<b>423,829</b>	<b>427,655</b>	<b>431,503</b>	<b>1,282,987</b>
7 <b>Existing Rates</b>				
8 Monthly Fixed Charge (\$)	46.30	46.30	46.30	
9 For each cubic meter between 12 and 75 cubic meters (\$/m <sup>3</sup> )	1.93	1.93	1.93	
10 For each cubic meter over 75 cubic meters (\$/m <sup>3</sup> )	1.93	1.93	1.93	
11 <b>Revenue Forecast</b>				
12 Monthly Fixed Charge (\$)	1,015,637	1,024,804	1,034,027	3,074,468
13 For each cubic meter between 12 and 75 cubic meters (\$)	363,830	367,114	370,418	1,101,362
14 For each cubic meter over 75 cubic meters (\$)	25,860	26,093	26,328	78,281
15 <b>Total Revenue Forecast (\$)</b>	<b>1,405,327</b>	<b>1,418,011</b>	<b>1,430,773</b>	<b>4,254,111</b>

3. With the reduction to the base consumption and no further changes to EWW's rate structure, EWW projected to over-collect \$189 thousand from the residential customer class over the 2021 to 2023 period. This over-collection of \$189 thousand was used to determine the reduction required to the basic charge.

**Table EWW-WURS-01-5.2-3**  
**Residential Revenue Over Collection**  
**(\$)**

Revenue Forecast	A 2021	B 2022	C 2023	D Total
1 With 15 cubic meters base consumption	1,342,881	1,355,002	1,367,197	4,065,080
2 With 12 cubic meters base consumption	1,405,327	1,418,011	1,430,773	4,254,111
3 <b>Revenue Over Collection at Existing Rates</b>	<b>62,445</b>	<b>63,009</b>	<b>63,576</b>	<b>189,031</b>

4. As detailed in Table EWW-WURS-01-5.2-4, the over-collection of \$189 thousand was divided by the total customer forecast which returned a reduction to the base charge of \$2.85 per month for residential customers.



**Table EWW-WURS-01-5.2-4**  
**Calculation of Monthly Fixed Charge at 12m<sup>3</sup>**

	A
1 Revenue Over Collection at Existing Rates	189,031
2 Customer Forecast x 12 Months	66,403
3 <b>Reduction Monthly Fixed Charge (Row 1 / Row 2)</b>	<b>2.85</b>
4 Existing Monthly Fixed Charge	46.30
5 <b>New Monthly Fixed Charge</b>	<b>43.45</b>



**6.0 Reference: Application, pg. 8, para. 18 and pg. 14, section 2.1**

**Explanation:** “EWW draws water from 18 active wells in two separate aquifers. Both aquifers provide good quality drinking water but one aquifer has slightly elevated levels of iron and manganese. This requires treatment in order to comply with the Guidelines for Canadian Drinking Water Quality.”

And EWW provides “quarterly newsletters, operational updates and water conservation information to customers (mailed with bills).”

**Request:**

- 6.1 Provide any survey or other information to show that EWW’s customers are satisfied with the current water quality. If they are not satisfied, what improvements would be recommended and approximately what cost would be required?
- 6.2 Provide an example of the “quarterly newsletters, operational updates and water conservation information”.
- 6.3 What does the “Wellhead Protection Plan” entail?

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**Response to request 6.1:**

There are no recent customer surveys addressing water quality. There are sulphates in the water supply from the North Zone of the French Creek Utility which can present odor and taste aesthetic aspects. The 2021-2023 proposed rates incorporate operating costs to optimize existing treatment to improve water aesthetics by adjusting/piloting well production, new set point and parameters of chlorine residuals and testing.

**Response to request 6.2:**

See EWW-WURS-01-Attachment 2 and EWW-WURS-01-Attachment 3.

**Response to request 6.3:**

The Wellhead Protection Plan is required by the VIHAF as part of the source water approvals for all new utility, waterworks and local government groundwater wells. It is a living document that defines capture zones for each well within the French Creek Utility. The footprint of each well



capture zone defines an area within which risks or hazards to groundwater quality are identified based on current land use within the capture zones.



**7.0 Reference: Application, pg. 10, para. 26**

**Explanation:** EWW states that “Over the 2022 to 2023 period EWW forecasts its revenue requirement to increase by an average of 2.6% per year which is in line with inflation.”

**Request:**

7.1 Given the recent announcement by the Bank of Canada that interest rates will remain close to 0%, why does EWW believe that 2.6% is in line with inflation?

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**Response to request 7.1:**

In paragraph 26 of the application EWW incorrectly referenced inflation when it should have referenced its escalator factors, which ranged from 2.0% to 2.7%. EWW recognizes that a revenue requirement increase of 2.6% would be higher than Inflation (Consumer Price Index).

In Table EWW-WURS-01-17.1-2 EWW has reforecast its Consumer Price Index (CPI) escalator, using more recent data. Even with the recent Bank of Canada announcement inflation forecasts for the 2022-2023 period have not changed significantly.



**8.0 Reference: Application, pg.15, para. 40**

**Explanation:** “During the 2021 - 2023 test period, the EWW Operations Manager will provide support to other EWSI sites operated in BC, resulting in salary reallocations and the addition of a part time operator to augment field operations.”

**Request:**

8.1 Which other sites will the Operations Manager support and how was the cost allocation determined?

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**Response to request 8.1:**

In addition to the French Creek Utility, the operations manager supports the Britannia Mine Water Treatment Plant. The cost allocation is based on the historic demands of both facilities.



**9.0 Reference: Application, pg. 16, para. 45**

**Explanation:** “Actual capital expenditures include amounts related to completed projects noted above and well projects are expected to be completed by the end of 2020.”

**Request:**

9.1 Please update the status of the well projects to be completed by end of 2020.

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**Response to request 9.1:**

VIHA approval of Well No. TWs1 was provided August of 2020. TWs1 was immediately put into service upon receipt of VIHA approval.





**10.0 Reference: Application, pg. 17, Table 3.1.1-2 Capital Projects**

**Explanation:** The table compares previous Decision forecast costs to current forecast.

**Request:**

10.1 Nearly all capital projects came in below original forecast. Why, and is there a propensity to over forecast project costs by EWW?

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**Response to request 10.1:**

EWW does not have a propensity to over forecast project costs. The largest variance over the 2018-2020 term was on *Existing Wells – Well Rehabilitation Program (Overhauls)* with a variance of \$67,000. The cost of well rehabilitation work is highly uncertain, as the assets are underground and the specific deficiencies cannot be known until an asset undergoes inspection. The second largest variance was on *Subdivision – Multi-meter installations (contributed)* with a variance of \$47,000. This project is driven by the pace of development and is fully contributed which would not affect water rates. These two items comprise more than half of the total capital variance.

Excluding developer-funded capital, the total variance is 14% which is a reasonable variance between forecast and actual costs.



**11.0 Reference: Application, pg. 17, para. 48**

**Explanation:** "One well is currently waiting source water approval from VIHA."

**Request:**

11.1 What is the status of this VIHA approval?

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**Response to request 11.1:**

TWS1 received Source Water Approval from VIHA in August 2020.



**12.0 Reference: Application, pg. 18, para. 52**

**Explanation:** “EWW has submitted applications for water licenses for all 18 wells in EWW’s system.”

**Request:**

12.1 What is the status of the well licenses?

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**Response to request 12.1:**

There has been no progress to date, the application is still under review by the B.C. Ministry of Forests, Lands, Natural Resource Operations and Rural Development



**13.0 Reference: Application, pg. 18, para. 54**

**Explanation:** “Rather than purchasing a new printer, EWW decided to lease a new printer. This printer replaces both of the previous printers in the French Creek office and can meet all of the day to day printing requirements, as well as print the water bills.”

**Request:**

13.1 What is the annual lease cost of the new printer and why is that option more cost effective than purchasing a new printer?

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**Response to request 13.1:**

Upon further review of the operating costs included in the Application, costs for a new printer have been inadvertently excluded from the operating cost forecast. In 2019, EWSI purchased a new printer for the French Creek office, but these costs have not been allocated to EWW. As a result, no costs related to the new printer (lease or capital) are included in the Application.



**14.0 Reference: Application, pg. 20, para. 67**

**Explanation:** “The well rehabilitation program will fully rehabilitate three wells over the rate period.”

**Request:**

14.1 Were any of these wells included for rehabilitation in the last RRA? If yes, why was that work not completed?

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**Response to request 14.1:**

No. All wells scheduled for rehabilitation were completed during the filing period. Wells Referenced PW-DR-1 (Drew Road), TW-N1 (Lundine Lane) and PW-HC-7 (Hills of Columbia) underwent rehabilitative works in the years 2018, 2019 and 2020, respectively.



**15.0 Reference: Application, pg. 21, para. 72**

**Explanation:** “Bulk Water Connection to RDN – A project to install a Bulk Water Line (\$349 thousand) between EWW and the Regional District of Nanaimo (“RDN”) is currently being explored to determine feasibility. This project would be 100% developer funded and would see EWW purchasing and treating raw water from the RDN at the Drew Road Water Treatment Plant. A portion of the treated water would be sold back to the RDN for their use. The remaining treated water would be available for future EWW customer use. Preliminary estimates indicate that this project would supply water for an estimated 50-75 new connections. This project would likely be completed during the 2021-2023 period.”

**Request:**

- 15.1 Why is this project expected to be more cost effective than adding new wells by EWW when demand warrants it?
- 15.2 Using EWW’s forecast of new customers and their capacity requirements, when would this new supply be required?
- 15.3 Why is the budget for this investigation as high as \$349,000 and how much of it would be paid by RDN?

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**Response to request 15.1:**

Based on past experience the capital costs of new wells can be significant (\$500 – \$1,500 thousand) with varying levels of output provided from the well. The Bulk Water Line project has the potential to provide EWW with a known level of supply at a lower capital cost. In addition, the application review and approval process to place a well into production does not enable a quick, responsive solution to bring more supply on line.

As explained in Paragraph 64 of the Application, the discussions with the RDN are not yet at a stage where specific costs and cost-sharing agreements can be determined. As more information becomes available through discussion with the RDN, EWW will evaluate the: operating costs; capital costs; volume of water available; and the results of the proposed ground water study to evaluate the rate impacts of either proceeding with Bulk Water Line project or adding new wells.



**Response to request 15.2:**

Based on current well capacity and forecast customer growth EWW projects to require a new source of supply by 2025.

**Response to request 15.3:**

This amount is a placeholder that was estimated by Stantec as part of the 2020 Master Plan. The placeholder is required to provide EWW with the flexibility to (a) take advantage of a cost effective supply agreement with a third party, if such an agreement can be reached and/or (b) accommodate higher-than-expected development if required.

As explained in Paragraph 64 of the Application, the discussions with the RDN are not yet at a stage where specific costs and cost-sharing agreements can be determined. In fact, there is a good possibility that no agreement will be reached. There is a strong possibility that the \$349,000 will not be required over the 2021-2023 term. Because this amount is 100% attributed to developers, it has no impact on rates and will only be withdrawn from the DCTF in the event that the funds are required. As stated in Paragraph 64 of the Application, if development expansion is higher than anticipated and EWW must secure a new source of supply within the 2021-2023 period, and if that "solution is a project other than the Bulk Water Connection to the RDN, then EWW will advise the Comptroller in advance".



**16.0 Reference: Application, pg. 23, Table 4.1.1-1 and pg. 34 Table 6.1-1, New Customers**

Explanation: As part of the CIAC application process, a developer has forecast 85 new Multi-Residential units.

**Request:**

16.1 Based on this new information, would EWW adjust its Multi-Residential forecast for this test period? Why or why not?

16.2 EWW forecasts 15 new Multi-Residential for 2020 but no new growth in the test period. How many new customers are now forecast in 2020 and are there any projects underway for 2021?

16.3 Looking at Table 6.1-1, the consumption deferral account has had significant additions since 2017. Would that support a higher consumption forecast for the test period?

**Response to request 16.1:**

No. In the past, EWW utilized the development plans of private developers as the basis of EWW’s forecast of new sites. EWW has observed that the actual number of new sites is typically lower than the forecast developed on this basis. In order to improve forecast accuracy, new sites are now projected based on historical trending. These sites have not received approvals to date and the timing is as of yet uncertain.

**Response to request 16.2:**

Table EWW-WURS-01-16.2-1 provides an updated customer forecast for 2020. There are currently no approved Multi-Residential connections applications, and at this time no new Multi-Residential connections are expected in 2021.

**Table EWW-WURS-01-16.2-1  
 2020 Customer Count Forecast**

Customer Count Forecast	A Application	B Updated Forecast
1 Residential Units	1,812	1,796
2 Multi-Residential Units	268	268
3 Commercial Units	41	41
4 <b>Metered Units</b>	<b>2,121</b>	<b>2,105</b>





**Response to request 16.3:**

No. It is most likely that the higher-than-forecast consumption was the result of short term weather impacts, rather than the result of structural changes in the consumption trends of customers. EWW has concluded this for two reasons. First, consumption-per-customer is a metric that tends to decline over time as more customers install high efficiency appliances. Thus, there is no theoretical basis upon which to conclude that customers have structurally increased their water usage. Second, total monthly precipitation in May, June, July and August of 2018-2020 was 31% below the average in those months over 1971-2020 as shown in Table 1. Discretionary water usage tends to be outdoor water usage such as watering of lawns and gardens, and tends to be lower when there is high summer precipitation.

**Table EWW-WURS-01-16.3-1  
Total Monthly Precipitation (mm)  
May-August 2018-2020 vs. Historical Average<sup>1</sup>**

	A	B	C	D	E	F
	2020	2019	2018	2018-2020 Average	1971-2020 Average	Difference
1 August	43.7	20.1	3	22.3	31.6	-30%
2 July	15.7	24.3	3	14.3	25.9	-45%
3 June	64.2	24.8	48.6	45.9	44.9	2%
4 May	46.3	17.3	5.9	23.2	49.9	-54%
<b>5 Average</b>						<b>-31%</b>

<sup>1</sup>

<https://nanaimo.weatherstats.ca/charts/precipitation-monthly.html>  
<https://www.eldoradoweather.com/canada/climate2/Nanaimo.html>



**17.0 Reference: Application, pg. 25, para. 84, Escalation Factors**

**Explanation:** Table 4.3-1 tabulates the escalation factors.

**Request:**

17.1 Please provide EWW's revised estimate of the Wages and Salaries and CPI escalation factors taking into account the impact of COVID19 and recent Bank of Canada interest rate projections.

**Response to request 17.1:**

EWW's proposed escalation factor for wages, salaries and benefit costs was derived from three sources. The Conference Board of Canada (TCBC) forecast of two data series – wages and salaries per employee and average weekly wages and salaries per employee, and the BC Ministry of Finance Budget and Fiscal Plan 2020/21 – 2022/23 (Compensation of Employees/Labour Force). The BC Ministry of Finance Budget and Fiscal Plan is an annual report, which is typically released in February, a more recent version of this report is not available at this time.

In Table EWW-WURS-01-17.1-1 EWW has updated the wages and salaries escalation factor using the most recent forecasts available from TCBC. The updated calculation results in a reduction of the escalation factor from 2.7% to 1.6%.

**Table EWW-WURS-01-17.1-1  
Wages and Salaries Escalator**

	A	B	C	D
Source	Date Published	2022F	2023F	Average
1 TCBC Wage and Salaries	23-Nov-20	0.92%	2.29%	1.60%
2 TCBC Avg. Wage and Salaries	23-Nov-20	0.92%	2.29%	1.60%
3 BC Ministry of Finance	N/A	N/A	N/A	N/A
4 <b>Average</b>		<b>0.92%</b>	<b>2.29%</b>	<b>1.60%</b>
5 Application - Escalator		2.69%	2.68%	2.70%

The CPI escalation factor was based on the BC Ministry of Finance Budget and Fiscal Plan. As a more recent versions of the report is not available at this time EWW has gathered three independent CPI forecasts, that have been updated to reflect the current economic environment. These forecasts include a forecast purchased from TCBC, and publicly available forecasts from RBC



Economics and BMO Capital Markets. As shown in Table EWW-WURS-01-17.1-2 the updated CPI escalation factor has increased from 2.0% to 2.1%

**Table EWW-WURS-01-17.1-2  
Consumer Price Index**

	A	C	D	E
Source	Date Published	2022	2023	Average
1 TCBC	23-Nov-20	2.52%	2.12%	2.30%
2 RBC Economics <sup>2</sup>	15-Dec-20	1.80%	N/A	1.80%
3 BMO Capital Markets <sup>3</sup>	23-Dec-20	2.00%	N/A	2.00%
4 <b>Average</b>		<b>2.11%</b>	<b>2.12%</b>	<b>2.10%</b>
5 Application - Escalator		1.97%	2.00%	2.00%

<sup>2</sup> RBC Economics, "Provincial Out Look" December 15, 2020. <https://royal-bank-of-canada-2124.docs.contently.com/v/2021-promises-better-days-from-coast-to-coast-pdf> as accessed on December 29, 2020.

<sup>3</sup> BMO Capital Markets Economic Research, "Provincial Economic Outlook for Dec. 23, 2020", December 23, 2020. [https://economics.bmo.com/media/filer\\_public/39/0d/390dd4e4-d646-4a42-9a8a-3e57fbc30dfe/provincialoutlook.pdf](https://economics.bmo.com/media/filer_public/39/0d/390dd4e4-d646-4a42-9a8a-3e57fbc30dfe/provincialoutlook.pdf) as accessed on December 29, 2020.



**18.0 Reference: Application, pg. 26 Table 4.3-2**

**Explanation:** Wages and Salaries

**Request:**

18.1 Footnote # 6 references the Ministry of Finance report of February 18, 2020. Is there a more recent report and what % inflators does it use?

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**Response to request 18.1:**

The Ministry of Finance report referenced in Footnote # 6 of the Application is published as part of the Government of British Columbia annual budget process, and is typically released in February. A more recent version of the report is not available at this time.



**19.0 Reference: Application, pg. 28, paras. 97 - 101 & pg. 33 paras. 116-117, Inter-corporate Services**

**Explanation:** “The decreases in corporate service charges between the 2020 decision and the test period are primarily attributable to increased growth in EWSI’s other operations. During the 2017 to 2020 period total EUI Corporate Services and EWSI Shared Services costs escalated in line with the 2017 to 2020 forecast. Over this same period EWSI’s other operations have grown at a faster pace than EWW, this results in a reduction to the percentage of intercorporate service charges allocated to EWW (0.55% to 0.44%).”

**Request:**

19.1 Has the methodology for allocating Inter-corporate Service Charges remained the same as that accepted in the 2018-2020 RRA? If not, what are the changes and have they been reviewed and accepted by any regulator?

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**Response to request 19.1:**

Yes. There have been no changes to the methodology for allocating Inter-corporate Service Charges between the approved 2018-2020 RRA and the 2021-2023 RRA Application.



**20.0 Reference: Application, pg. 31, para. 109, Operating Costs**

**Explanation:** “An increase in senior manager support (0.22 FTE), this support will primarily come from the Sr. Manager Regional Operations, and the Sr. Manager Project Development and Delivery positions located in Alberta. The senior manager support will include but is not limited: to Government liaison activities with the Ministry of Forests, Land, Natural Resource Operations & Rural Development, and the Vancouver Island Health Authority; CAP Committee meetings and presentations; capital project oversight (project management, vendor evaluation, etc.); review and input into operational studies to be completed over the 2021 to 2023 test period; and vacation coverage for the EWW operations manager position.”

**Request:**

20.1 The senior manager support FTE allocation was only 0.06 in the last 3 years. The activities of EWW over the next 3 years appear to be less than during the capital growth period of the last 6 years. Please provide further justification for the increased FTE allocation to 0.22?

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**Response to request 20.1:**

As discussed in paragraph 109 of the Application, the EWW operations manager position has been reduced from 1 FTE to 0.6 FTE, which has enabled an increase in senior manager support without a net increase in costs to the customer.

Although the level of capital investment over the 2021-2023 period are relatively low, the focus over this rate period is strategic planning to ensure the utility is carefully positioned to ensure that future growth can be accommodated at a reasonable cost to customers. EWW has experienced increased involvement with the RDN Board of Directors, the surrounding communities seeking consistent water use strategies and other users sharing the aquifers EWW draws from. This coordination and strategic planning will involve studies and negotiations, both of which will require senior-level oversight and direction. Including the Sr. Manager Regional Operations and the Sr. Manager Project Development in strategic decision making will ensure that the critical decisions made over the 2021-2023 period, which will affect French Creek customers' service and rates for many years into the future, are prudent.



**21.0 Reference: Application, pg. 33, para. 114, Appendix D pg. 8, Ground Water / System Capacity Study**

**Explanation:** “This study will look at options to maintain and increase supply capacity for future development in French Creek. EWW has forecast a cost of \$52.5 thousand to complete this study, with 50% allocated to current customers (\$26.3 thousand included in the 2021-2023 test period) and 50% allocated to the future customers as part of the Deferred Capacity Trust Fund.”

**Request:**

- 21.1 Recognizing the previous studies undertaken for EWW and the current supply balance, why is this study necessary at this time and when will new growth require new supply?
- 21.2 If the study is for future growth why is it allocated 50% to existing customers?
- 21.3 EWW should have considerable information on its water supply as a result of the expansions undertaken over the last 10 years. Why then would the study cost over \$50,000 and why is it not being done by EWSI?

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**Response to request 21.1:**

The aquifer is being drawn from at a faster rate than it replenishes. Maintaining current service levels as well as accommodating future development in French Creek will exceed the amount that can be extracted from the aquifer long term. Drilling new wells into the same aquifer cannot address this issue. Thus, EWW requires an understanding of the other potential sources of groundwater in the areas as well as the growing impacts of other development in the area that draw water from their own well system.

See response to EWW-WURS-01-15.2.

**Response to request 21.2:**

The study is not only to assess the ability to support future growth but also to evaluate the risk to the existing customer base and the existing well system. The study also benefits existing users (even if there is no further development) as multiple groups draw from these aquifers and with previous years of drought conditions and the growth of registered wells in the region, aquifer



health is a concern. Finally, the last groundwater study was conducted approximately 10 years ago and there has been significant development in the area since.

**Response to request 21.3:**

As the study relates solely to EWW's ability to maintain supply to existing customers in the French Creek utility and to accommodate growth through private development, the study is specific to the French Creek area. EPCOR does not have internal hydrogeological expertise and is reliant on the expertise of external consultants.





**22.0 Reference: Application, pg. 33 para. 114, Drew Road Reservoir Seismic Stability Study**

**Explanation:** “This Study will allow for a full seismic inspection of the Drew Road Reservoirs, and develop a plan and cost estimate to mitigate any issues that are identified.”

**Request:**

22.1 Why is this study necessary and what are the threats to the public if it is not done?

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**Response to request 22.1:**

The Drew Road reservoirs sit atop a steep slope and are constructed of reinforced concrete. The reservoirs were constructed in phases. The date of the first phase is not known based on existing records but is likely to have occurred in the 1980’s or 1990’s. The second phase occurred in 2003. Construction records relating to slope stability and seismic design are not available and what is available requires review and further investigation to determine whether the structure and founding conditions can withstand a seismic event. Any structural damage to the reservoir system that would take it out of service would result in the Drew Road system not being able to supply water to the distribution system.



**23.0 Reference: Application, pg. 39 para. 134, and Appendix B-3, pg. 11, Working Capital**

**Explanation:** “Forecast working capital requirements are based on the expected timing of EWW’s cash flows and represent 45 days of operating expenses.”

**Request:**

23.1 Does EWW have automated payment schemes that would reduce the duration or amount of working capital requirements?

23.2 Will the new billing system to be implemented in 2021 result in lower working capital needs in 2022 and 2023?

---

**Response to request 23.1:**

Yes, EWW currently offers an automated payment option to customers. Approximately 15% of EWW customer use the automated payment option. With EWW’s current billing system automated payments still require manual processing, as a result EWW has not realized material changes to its cash collection process.

In conjunction with the evaluation of a new billing system EWW is working with its bank to potentially improve automated payment processing which may impact EWW working capital requirements in the future. EWW intends to complete a lead lag study as part of its 2024-2026 Revenue Requirement and Rates Application to determine working capital impacts of automated payment processing.

**Response to request 23.2:**

EWW is in the early stages of evaluating potential billing systems. At this time EWW is unable to determine if a new billing system will impact EWW’s working capital needs in 2022 and 2023. EWW intends to complete a lead lag study as part of its 2024-2026 Revenue Requirement and Rates Application, once the new billing system is implemented, to determine the working capital impacts of the new billing system.



**24.0 Reference: Application, pg. 41, para. 140, ROE**

**Explanation:** “EWW has applied a 100 basis points equity risk premium, as approved by the Comptroller in Order 2528, above the ROE for 2016 set by the BCUC for the low risk benchmark utility (BCUC Order G-129-16)<sup>10</sup>.”

**Request:**

24.1 It appears that the BCUC last set the low risk benchmark ROE in 2016. When is the BCUC expected to review the low risk benchmark ROE again and would the results of that review be factored in to the EWW ROE for the upcoming test period?

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**Response to request 24.1:**

EWW has been informed by e-mail that the BCUC will likely review the low risk benchmark utility ROE again in 2021. It is unlikely that the results of that review would be finalized and available for incorporation into EWW’s rates for billing of January 2021 consumption. EWW is not proposing to re-open or amend its 2021-2023 Revenue Requirement and Rates Application for the incorporation of newly available inputs such as the low risk benchmark ROE.



**25.0 Reference: Potential sale of EWW**

**Explanation:** In the last RRA there was potential for a sale of EWW to the Regional District of Nanaimo.

**Request:**

25.1 Provide an update on the discussions between EPCOR Utilities Inc. and the Regional District of Nanaimo. If a sale is likely, would it be appropriate to reduce the Test Period to one year?

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**Response to request 25.1:**

Negotiations have been concluded and there will be no sale.



**26.0 Reference: Application pg. 42, para. 142, Cost of Debt**

**Explanation:** “The cost of debt in the table above reflects the average of the cost of debt for prior years’ debt issuances and a forecast cost of debt for new issues of inter-company debt based on published long term bond yields and spreads as of April 20, 2020.”

**Request:**

26.1 Please update the debt calculations for conditions as at December 2020.

**Response to request 26.1:**

Table EWW-WURS-01-26.1-1 provides updated cost of new debt, average cost of debt, and return on debt for the 2020 to 2023 period. The 2020 cost of new debt, is based on July 2020 actual rates, and has decreased from 3.58% to 3.40% (EWV uses the actual mid-year rate for debt issuances). The costs of new debt for the 2021 to 2023 period is based on forecast long term bond yields and spreads as of December 2020, and has reduced from 3.79% to 3.71%. As EWV is only issuing \$165 thousand of new debt over the 2020-2023 period, with \$3,302 thousand of prior outstanding debt, updating debt rates has a minimal impact on EWV’s return on debt and revenue requirement.

**Table EWW-WURS-01-26.1-1**  
**Cost of Debt**  
**2022-2023**  
**(\$ thousands)**

	D 2020F	E 2021F	F 2022F	G 2023F
<b>Application</b>				
1 Cost of New Debt	3.58%	3.79%	3.79%	3.79%
2 Average Cost of Debt	5.27%	5.26%	5.22%	5.20%
3 Return on Debt	174.0	174.1	177.9	180.1
<b>Updated</b>				
4 Cost of New Debt	3.40%	3.71%	3.71%	3.71%
5 Average Cost of Debt	5.26%	5.26%	5.22%	5.19%
6 Return on Debt	174.0	174.1	177.8	180.0



**27.0 Reference: Financial Schedule 1.2**

**Explanation:** Other Revenues Actuals & Forecast

**Request:**

27.1 Explain why the previous test period actual and forecast Other Revenues are all higher than the forecast 2021 Other Revenues?

27.2 Update the 2020 Forecast Other Revenues.

**Response to request 27.1:**

Approximately 70% of EWW's other revenue is derived from the Availability of Service Charge. The annual Availability of Service Charge is calculated at 70% of the residential month base rate. With the residential base rate decreasing from \$46.30 to \$43.45 in 2021 the annual Availability of Service Charge is also decreasing from \$388.96 to \$365.01. The reduction in the Availability of Service Charge is causing the lower 2021 other revenue forecast.

**Response to request 27.2:**

Table EWW-WURS-01-27.1-1 provides an updated 2020 other revenue forecast.

**Table EWW-WURS-01-27.1-1  
2020 Other Revenue Forecast  
(\$ thousands)**

	A	B
<b>Other Revenue</b>	<b>Application</b>	<b>Updated Forecast</b>
1 Late payment fees and collection charges	1.9	2.1
2 Connection and service fees	3.6	4.4
3 Miscellaneous revenue	14.5	10.1
4 <b>Total Other Revenues</b>	<b>20.1</b>	<b>16.6</b>



**28.0 Reference: Financial Schedule 2.2**

**Explanation:** Contractors and Consultants charges

**Request:**

28.1 Please further explain why the Contractors and Consultants forecast costs on line 9 of schedule are so much higher than those experienced in the last test period?

28.2 Please update the forecast 2020 expenditure for Contractors and Consultants.

**Response to request 28.1:**

Over the 2018 to 2020 period EWW's Contractors and Consultants costs have ranged from \$40 to \$90.7 thousand per year (197K total). Over the 2022 to 2023 period EWW has forecast \$50 thousand per year, plus inflation for a base contractor costs (153K total), which is slightly lower than 2018 to 2020 actual/forecast costs. As discussed in Section 5.3 of the Application, EWW has identified three studies to be completed over the 2021 to 2023 period. The additional costs (95.6K) to complete the three studies are driving the increase in forecast Contractors and Consultants costs over the 2021 to 2023 period. Table EWW-WURS-01-28.1-1 provides a further breakdown of the contractor and consultant costs included in the Application.

**Table EWW-WURS-01-28.1-1  
Contractors and Consultants costs  
2021-2023  
(\$ thousands)**

Item	A 2021	B 2022	C 2023	D Total
1 Base Contractors	50.0	50.0	50.0	150.0
2 Ground Water Study - 50%	26.3	-	-	26.3
3 Ch. Rr Twinning Study - 50%	15.8	-	-	15.8
4 Drew Rr. Reservoir Study - 100%	-	52.5	-	52.5
5 <b>Total Contractor Costs</b>	<b>92.0</b>	<b>102.5</b>	<b>50.0</b>	<b>244.5</b>
6 Expense Smoothing for Rate Setting	92.0	102.5	50.0	244.5

**Response to request 28.2:**

EWW is currently forecasting \$90.7 thousand in contractor and consultant costs in 2020.



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**29.0 Reference: Appendix E-1**

**Explanation:** Service Agreement between EWSI and EWW

**Request:**

29.1 If there have been any changes to the Service Agreement since its review in the last RRA, please explain them.

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**Response to request 29.1:** The following changes were made to the Service Agreement since its review in the last RRA:

- Service Provider contact name changed from “John Elford” to “Shawn Bradford” (pages 11 and 14) to reflect updated contacts.
- Service Receiver contact name changed from “Dave Rector” to “Christian Madsen” (pages 11 and 14) to reflect updated contacts.
- Schedule A3, Section 2(f) – “Costs associated with maintaining office space in EPCOR Tower”, moved from “Rent” to “Financial Services / Business Unit Controller Group”
- Schedule A3, Section 3 – added “All safety program services necessary to carry on the business”, points (a) to (d). These were included in Section A4 in the last RRA.
- Schedule A3, Section 8 – title changed from “Regulatory Affairs” to “Regulatory and Operational Excellence” for clarity.
- Schedule A3, Section 8 – added “All business process management services”, points (d) and (e), which were in the “Business Process Management” section in the last RRA.
- Schedule A4, Section 2 – removed “Maintenance of the water distribution engineering” and “Review of submissions from developers”, as these are no longer provided by EWSI.
- Schedule A4, Section 3 – removed “Annual water loss audits”, as this is no longer provided by EWSI.





**30.0 Reference: Appendix E-2**

**Explanation:** EUI Corporate Service Costs

**Request:**

30.1 Explain any changes to this document since the review in the last RRA.

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**Response to request 30.1:**

As stated in Paragraph 4 of Appendix E-2, “The organization of the Corporate Services departments remains largely the same as in EWW’s 2018-2020 RRA Application, with the exception of the Learning and Development function which was created in Corporate Services in 2019”. As explained in EWW-WURS-01-19.1, there has been no change to the allocation methodology itself.

The document Appendix E-2 has been simplified, shortening its length from 32 pages to 6 pages. This was deemed appropriate by EWW because, as explained in the paragraph above, the organization of the Corporate Services departments remains largely the same and the methodology itself has not changed, and because the corporate service charges decreased between the 2020 decision and the test period.



**31.0 Reference: Appendix E-3**

**Explanation:** EWSI Shared and Direct Service Charges Allocation Methodology.

**Request:**

31.1 Explain any changes to this document since the review in the last RRA.

31.2 Provide a table of the actual direct service charges for 2018-2020 and the forecast Direct Charges for the test period.

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**Response to request 31.1:**

No changes were made to Appendix E-3, other than those mentioned in Request 29.0 above.

**Response to request 31.2:**

At this time the 2020 actual regulated financial results for EWW are not available. EWW prepares its year-end regulated financial statements following the finalization of the legal entity financial statements for EPCOR Utilities Inc. EWW will provide the Comptroller with a response to this information request during the week of March 29 to 31, 2021 once these regulated financial statements are completed.



Christine Legault and Tim Pritchard (we) submit this Intervener's Information Request in accordance with instructions issued by the Office of the Deputy Comptroller of Water Rights in Appendix B to Order 2572.

Questions or comments regarding this Intervener's Request can be sent to:

Christine Legault  
[dancrislegault@gmail.com](mailto:dancrislegault@gmail.com)  
613-399-5207

Tim Pritchard  
[t.m.pritchard@shaw.ca](mailto:t.m.pritchard@shaw.ca)  
250-752-2723

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## I. Introduction

As EPCOR Water West (EWW) customers and as members of the French Creek Community Advisory Panel (CAP) group, we offer the following comments and information requests to gain a better understanding of both the near-term and long-term implications of the approvals being sought by the Applicant (EWW).

Overall, we think the EWW water system is operating quite well. Improvements and new water supply investment over the past decade have upgraded the system and improved water quality. Initially, the required capital investment resulted in sizeable increases in water rates; however, much of this investment has been completed and the water rates have been essentially flat over the past three years.

For the upcoming test period, indicated capital investment requirements are primarily for maintenance and upgrades to older operating equipment. As a result, the applied for water rates remain essentially flat, offering customers minimal cost increase to 2023. While we consider this to be a commendable operating record, we feel it is time for EWW to take a more proactive approach in the upcoming rate period to address forecast capacity beyond 2023.

The information provided in the Stantec French Creek Water System Master Plan Update 2020 (Master Plan Update) raises questions as to whether the EWW water system will have adequate water supply for the period 2024 and beyond.



In this context, we provide comments and request clarification in three specific areas, as follows:

- The New Rate Structure and how it addresses future water conservation,
- The Master Plan and its role in planning for the future, and
- Future Water Supply Needs based on recommended capacity studies and forecasted housing development in the French Creek area.

## II. New Rate Structure

In section 1.1.1, item 8 of the Application, EWW proposes changes in the New Rate Structure that reduce the base amount from 15 m<sup>3</sup>/month to 12 m<sup>3</sup>/month. We consider this a good first step to introduce the practice of increased water conservation to consumers, however we agree with EWW that it will not achieve any significant amount of conservation.

Note: EWW states in a presentation to the CAP on May 12, 2020, Appendix B-3, pg. 48:

*“EPCOR is not currently forecasting any decline in usage volumes as a result of this new rate structure change.”*

In section 1.1.1 item 7, EWW has identified and assessed a second alternative to achieve water conservation, namely, to introduce a higher price for water consumption above 75 m<sup>3</sup>/month. Financial Schedule 1.1, page 2 of the application indicates that this level of usage represents 3.16% of residential consumption. It is assumed that this high level of consumption mainly occurs in the 3<sup>rd</sup> quarter and is due to irrigation during the summer months. If implemented at this level, the impact on additional conservation would likely be minimal at best.

We understand that EWW has decided not to implement this initiative in the upcoming regulatory period in consideration of the potential negative financial impacts on consumers from COVID-19. We assume this initiative could be introduced in the 2024 application. If so, we feel it prudent that prior to moving in this direction, EWW take the time now to assess additional (lower) levels of consumption and the quarters they occur in. This information would provide a basis of determining what further adjustments could be made to the rate structure to achieve more significant levels of conservation.

A change in the EWW top tier consumption level to 60 m<sup>3</sup>/month or 50 m<sup>3</sup>/month is not expected to be a radical change. Having the requested information now would provide more insight into the opportunities that such an upper tier change might provide.

Furthermore, EWW should share the need for implementing new water conservation measures with the CAP and communicate this information to customers well before the 2024 application.



With this information in hand, customers would be aware of the additional conservation potential should EWW include a further rate structure modification in its 2024 - 2026 rate application.



**Request 1:**

*We request that EWW confirm they will consider alternative consumption levels now to support potential future modifications to the rate structure.*

It is understood that the assessment of this information is intended to promote more significant levels of water conservation while maintaining the balance between incenting water conservation and minimizing customer bill increases.

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**Response to Request 1:**

Not confirmed. EWW has completed its rate structure analysis for the 2021-2023 Revenue Requirement and Rates Application and will not be considering alternative rate structure options until preparing for the next rates application. EWW will begin preparation of its 2024-2026 Revenue Requirement and Rates Application in 2023 and at that time will assess whether additional measures are required. Consumption data from the years 2021 and 2022 will provide insight into the impact of the proposed rate structure changes on consumption patterns.



**Request 2:**

*We request that EWW confirm they will share the results of their assessment of alternative consumption levels with the CAP and they will communicate information on potential conservation measures with consumers.*

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**Response to Request 2:**

See response to EWW-Legault-Prichard-01-01.



**Request 3:**

*As a minimum we request that EWW confirm they will assess the following alternate consumption levels, or similar levels of water usage, as follows:*

- a. the percentage of Residential and Multi-Residential consumption by quarter over 60m<sup>3</sup>/month*
- b. the percentage of Residential and Multi-Residential consumption by quarter over 50m<sup>3</sup>/month*

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**Response to Request 3:**

See response to EWW-Legault-Prichard-01-01. EWW analyzes customer consumption trends and assesses alternate consumption levels based on rate setting best practices and guidance from the Principles of Water Rates, Fees, and Charges manual published by the American Water Works Association.





**Comment 1:**

In Section 1.1.1, item 5, EWW states:

*“In order to promote water conservation, follow industry best practices, and integrate input from the French Creek Community Advisory Panel (CAP), EWW explored three potential alternatives to update the current rate structure in preparation for the Application...”.*

It would be an overstatement to glean from this statement that the CAP had any significant discussion with EWW or input to EWWs decision to propose, or to not propose the measures they have included in the Application.



### **III. The Role of the Master Plan**

The 2021 - 2023 rate application contains a comprehensive Master Plan Update prepared by Stantec Consulting Ltd. dated March 4, 2020. This Plan provides a great deal of important information on the EWW French Creek Water System that can be used in future system and water supply planning.

We believe that this Master Plan is an important tool in the development of future system planning and that EWW continue to maintain and update the document and share the contents with the CAP.



**Request 4:**

*It is requested that EWW confirm they will continue to update the 2020 Master Plan, and that future Master Plan updates will be used to support the basis of future capital planning.*

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**Response to Request 4:**

EWW does not update its master plan over the course of a rate application term. In order to appropriately manage costs, a master plan is not developed for each rate application. EWW developed a master plan in 2015 and again in 2020. EWW will continue to develop master plans in the future as required to inform investment planning decisions.



**Request 5:**

*It is requested that EWW confirm they will continue to share the contents of updated Master Plans with the CAP in a timely manner.*

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**Response to Request 5:**

As stated in EWW-Legault-Prichard-01-04, EWW does not have plans to update its master plan over the 2021-2023 period. Consistent with historic practice, EWW will share the results of any future master plans with customers and consumer representatives.



#### IV. Future Water Supply Needs

Section 4.5 of the Application outlines the ‘Capital Planning and Capital Cost Forecasting Process’ undertaken for the 2021 - 2023 test period. It describes in considerable detail the work undertaken by EWW and Stantec Consulting Ltd. (“Stantec”) to prepare the 2020 Master Plan ‘to identify sustaining capital upgrades and improvements to the utility’s infrastructure necessary to meet customer needs’.

Despite the detail presented and assessed in the Master Plan, it is our view that the Application does not take an adequate forward-looking view of the future needs on the French Creek water system supply required to meet already planned development.

As identified in the EWW presentation to the CAP on May 12, 2020, Appendix B-3, pg. 22, EWW relied on the 2014 Master Plan population projections to establish proposed water rates for 2021 - 2023 test period. As such, EWW has trimmed the projected population growth from the 2014 Master Plan’s annual new connections from ~50 per year to closer to 20 connections per year. On the other hand, the Master Plan in Table 5-4 lists 16 development locations showing a total of almost 700 new housing units projected for the area and work on some of these has already started. If one conservatively says that all these proposed developments may not proceed and that it may take longer for those that do, the potential new connections could easily exceed 20 per year by a considerable margin and if so, where is the required water supply going to come from?

EWW partially addresses its prospective needs in Table 7.1-1, namely the \$349K capital initiative for a ‘Bulk Water Connection to the RDN’, whereby a portion of the treated water would be available for future EWW customer use. This proposed capital expenditure, represents 25.9% of total proposed capital expenditures during the test period and 61.3% of capital expenditures proposed in 2021.



**Request 6:**

*It is requested that EWW provide an estimate of the referenced treated water volume that would be available for future EWW customer use resulting from the completion of the Bulk Water Connection to the RDN, and how that estimate will address the future development projects indicated in Table 5-4 of the Master Plan.*

The Bulk Water Connection to the RDN capital project represents a significant portion of the proposed capital expenditures for 2021 and as a result was significant in developing the 2021 – 2023 rates.

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**Response to Request 6:**

As explained in Paragraph 64 of the Application, the discussions with the RDN are not yet at a stage where specific costs, cost-sharing agreements, and treated volumes of water that would be available for future EWW customer use can be determined.

The same applies to the projects listed in Table 5-4 as details relating to anticipated dates of connection, system demands are not known at this time.

Should an agreement be reached in the 2021-2023 term, any costs arising from such will be 100% attributed to developers and have no impact on the 2021 – 2023 rates. Any needed funds will be withdrawn from the DCTF in the event that the funds are required.



**Request 7:**

***It is requested that EWW provide the impact on water rates should the Bulk Water Connection to the RDN project not proceed.***

The impact of future development could be far more significant than EWW has anticipated in the application. This is real demand that will need to be accommodated; and delaying consideration of this until the 2024 - 2026 rate application would not be prudent for several reasons.

The cycle to identify potential well sites for additional supplies; assess the geology of potential sites; prepare and submit a drilling project plan; obtain approval to drill; drill, case and test a new well and submit results for regulatory approval can be a multi-year process and take considerably longer than is often appreciated or estimated. The regulatory step in the process can often be longer than it takes to drill, case and test a new well. This needs to be fully appreciated in assuring water supply for projected new developments and early action would be a good start in addressing this challenge.

The prospective development information is available and now a robust future water supply sourcing and implementation plan with realistic timing is needed.

It is understood that EWW will undertake a Groundwater/System Capacity Study in the 2021 – 2023 timeframe.

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**Response to Request 7:**

See response to EWW-WURS-01-15.3.

Whether or not a bulk water connection to the RDN project is constructed, rates over the 2021-2023 term will not be impacted. EWW has not yet projected rates beyond 2023. As noted in the comment above, EWW will undertake a Ground Water/System Capacity Study as well as a Church Road Main Twinning under Island Highway Study, both of which are critical to planning for future development.

It has been EWW's observation that prospective development plans tend to indicate a higher and faster level of development than actually occurs. In fact, over-forecasting future development based on prospective plans was the driver for the deficit in EWW's Deferred Capacity Trust Fund (DCTF). In Order 2576, the WURS states "It has been a longstanding objective of the Water Utility Regulation Section ("WURS") that the DCTF be in a positive balance to help fund future source supply expansions to accommodate new customers seeking to join the utility". EWW agrees that



it is important to return the DCTF to a positive balance within a reasonable period of time. Investing in new supply too far ahead of development also increases costs to developers. The objective of returning the DCTF to a positive balance can only be achieved by adding new supply to the system as it is required, rather than too far in advance.





**Request 8:**

*It is requested that EWW confirm it will undertake the Groundwater/System Capacity Study as soon as possible in 2021 so that additional capacity sources are identified without delay to enable development of those new sources.*

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**Response to Request 8:**

This cannot be confirmed at this time as there has been limited discussion with the RDN on the timing of their proposed Stage 3 Water Budget Analysis.



**Request 9:**

***It is requested that EWW confirm it will share the results of the Groundwater/System Capacity Study with the CAP when it is completed.***

At the Regional District of Nanaimo (RDN) Board meeting on December 8, 2020, Area G (French Creek) Director Lehann Wallace provided motions related to future water supply matters by proposing action to protect aquifers in the French Creek area in 2021. Of the three motions proposed, Motion # 3 stated:

*“That the Regional District of Nanaimo request that EPCOR {EWW} contribute matching funds of \$150,000 towards the Phase 3 Water Budget analysis in the French Creek Water Region for 2021, recognizing that further funding sources will be required to fully fund the project.”*

It is expected that this motion will be addressed at the RDN Board meeting in late January. It is reasonable to expect at this time that Motion #3 will be adopted.

Given that EPCOR {EWW} is specifically named in Motion #3, it is entirely plausible they could become a participant in the RDN referenced analysis. If so, there are several aspects requiring clarification on how this participation could impact the water rates requested in this Application.

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**Response to Request 9:**

Confirmed.



**Request 10:**

*It is requested that EWW advise whether it is aware of the referenced RDN Board Motion #3, namely the proposal for EPCOR to contribute matching funds of \$150,000 towards the Phase 3 Water Budget analysis in the French Creek Water Region for 2021?*

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**Response to Request 10:**

Confirmed, EWW is aware of the motion.



**Request 11:**

*It is requested that EWW advise the CAP Group as a whole, how participation in the proposed RDN study would impact the planned Groundwater/System Capacity Study, i.e., would this represent a duplication of the terms of reference for all or part of the EWW planned study?*

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**Response to Request 11:**

The RDN proposed study terms of reference is not confirmed at this time. Once details are known EWW will make every effort to ensure that the study will consider a review of the French Creek Well Network, surface water licensing and feasibility as well as groundwater feasibility for adjacent watersheds.



**Request 12:**

*It is requested that EWW explain the difference in the cost estimates for the two proposed studies and the impact that additional EWW funding would have on the water rates in this Application.*

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**Response to Request 12:**

EWW cannot comment on the scope and detail of the RDN's cost estimate at this time. However EWW is in agreement that there is a benefit to the French Creek Utility in participating in the Phase 3 Water Budget analysis for the French Creek Water Region. There will be no impact on the French Creek water rates over the 2021-2023 term, as EWW is not proposing to amend its applied-for rates to incorporate this cost.



NOVEMBER 2020

# NOTICE OF AN APPLICATION BY EPCOR WATER (WEST) INC.

## PROPOSING NEW RATES EFFECTIVE JANUARY 1, 2021

Notice is hereby given that EPCOR Water (West) Inc. (EWW) has filed an application to the Deputy Comptroller of Water Rights for approval under the provisions of the Water Utility Act and the Utilities Commission Act to set rates and charges for the upcoming 2021-2023 rate period. In its application, EWW requests approval of adjustments to its water rates to carry out its scheduled operating, maintenance and capital programs. These operating activities and capital investment projects will allow the Utility to continue providing safe and reliable water service to its customers.

The proposed water rates reflect no general increase or decrease to rates for each customer class. Rate riders applied in 2021-2023 are also proposed to refund outstanding balances in EWW's deferral accounts for the 2018-2020 period. These deferral accounts were approved by Order No. 2528 on June 21, 2018.

EWW has also proposed an adjustment to its lowest rate tier from 15 cubic metres (m<sup>3</sup>) - 75 m<sup>3</sup> to 12 m<sup>3</sup> - 75 m<sup>3</sup>, which would result in a reduction to the monthly base rates. If approved, the reduction to the minimum rate tier from 15 m<sup>3</sup> per month to 12 m<sup>3</sup> will mean that a customer consuming less than 15 m<sup>3</sup> per month will see a net reduction in their overall bill over the 2021-2023 period. A customer consuming more than 15m<sup>3</sup> per month will see a small increase in their bill over the same period.

For a customer consuming 20 m<sup>3</sup> per month, the proposed adjustments to the 2021-2023 rates and rate riders will result approximately in a \$1.74/month decrease in 2021, a \$1.53/month increase in 2022 and a \$1.62/month increase in 2023. A summary of the proposed rates and rate riders is provided below.

### Average residential customer monthly bill (based on an average consumption of 20 m<sup>3</sup> per month)

PROPOSED METERED RATES FOR 2021-2023				
	Existing Rates	Proposed Rates	Proposed Rates	Proposed Rates
	2020	2021	2022	2023
<b>RESIDENTIAL UNITS – MONTHLY CHARGE</b>				
First 12 m <sup>3</sup> (plus rate rider)		\$43.45	\$43.45	\$43.45
Rate rider		-3.48	-2.35	-1.13
First 15 m <sup>3</sup> (plus rate rider)	\$46.30			
Rate rider	0	-0.15	-0.1	-0.05
For each m <sup>3</sup> over 12 m <sup>3</sup> (plus rate rider)		1.93	1.93	1.93
For each m <sup>3</sup> over 15 m <sup>3</sup> (plus rate rider)	1.93			
Rate rider	0	-0.15	-0.1	-0.05
<b>MULTI-RESIDENTIAL UNITS – MONTHLY CHARGE PER UNIT</b>				
First 12 m <sup>3</sup> (plus rate rider)		39.53	39.53	39.53
Rate rider		-3.17	-2.14	-1.03
First 15 m <sup>3</sup> (plus rate rider)	42.23			
Rate rider	0	-0.15	-0.1	-0.05
For each m <sup>3</sup> over 12 m <sup>3</sup> (plus rate rider)		1.93	1.93	1.93
For each m <sup>3</sup> over 15 m <sup>3</sup> (plus rate rider)	1.93			
Rate rider	0	-0.15	-0.1	-0.05

<b>COMMERCIAL UNITS – MONTHLY CHARGE</b>				
First 12 m <sup>3</sup> (plus rate rider)		38.39	38.39	38.39
Rate rider		-3.07	-2.07	-1
First 15 m <sup>3</sup> (plus rate rider)	40.34			
Rate rider	0	-0.08	-0.05	-0.02
For each m <sup>3</sup> over 12 m <sup>3</sup> (plus rate rider)		0.96	0.96	0.96
For each m <sup>3</sup> over 15 m <sup>3</sup> (plus rate rider)	0.96			
Rate rider	0	-0.08	-0.05	-0.02
<b>FIRE HYDRANT AND STANDPIPE RATES</b>				
Hydrants, per hydrant, per annum (plus rate rider)*	582.84	582.84	582.84	582.84
Rate rider, per hydrant, per annum	0	-46.67	-31.49	-15.16
Standpipes, per standpipe, per annum (plus rate rider)	233.14	233.14	233.14	233.14
Rate rider, per standpipe, per annum	0	-18.67	-12.59	-6.06
<b>AVAILABILITY OF SERVICE CHARGE PER RENT CHARGE AGREEMENTS</b>				
Annual Charge	388.96	365.01	365.01	365.01

*\*charged to the Regional District of Nanaimo*

This Notice of Application is provided by mail to all of EWW's customers in lieu of a notice in the local newspapers to ensure that all existing customers are informed of the application. A copy of the application is available for public review on EPCOR's website at [www.epcor.com/frenchcreek](http://www.epcor.com/frenchcreek)

Any person wishing further information about the proposed rates can contact:

**Service Manager**

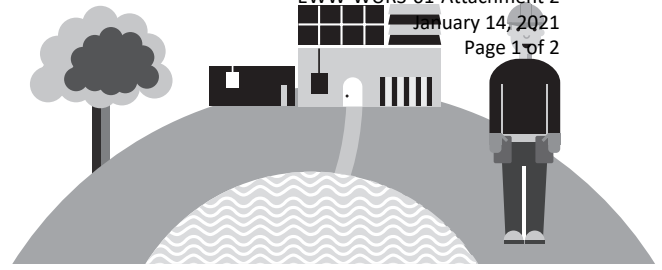
EPCOR Water (West) Inc.  
 #10-D 1343 Alberni Highway, Pine Tree Centre  
 Parksville, BC V9P 2B9  
 Fax: 250-954-0361  
 Email: [regulatorywater@epcor.com](mailto:regulatorywater@epcor.com)

In accordance with the attached Notice of Written Hearing Process (Appendix B to Order No. 2572) issued by the Office of the Deputy Comptroller of Water Rights, comments on the application are to be forwarded to Chris McMillan, Secretary to the Comptroller of Water Rights, on or before December 18, 2020, with a copy to EPCOR Water (West) Inc. at [regulatorywater@epcor.com](mailto:regulatorywater@epcor.com). Persons who wish to actively participate in the proceeding should register as interveners in writing to the Secretary to the Comptroller of Water Rights by December 4, 2020. For further information on this regulatory proceeding and schedule including Order No. 2572, please refer to EWW's website at [www.epcor.ca/frenchcreek](http://www.epcor.ca/frenchcreek).

By direction of the Deputy Comptroller of Water Rights, comments and intervener registrations can be forwarded to:

**Chris McMillan, Secretary to the Comptroller of Water Rights**

Ministry of Forests, Lands and Natural Resource Operations and Rural Development  
 PO Box 9340 Stn Provincial Government, Victoria, BC V8W 9M1  
 or by email: [Chris.McMillan@gov.bc.ca](mailto:Chris.McMillan@gov.bc.ca)



# EPCOR FRENCH CREEK NEWSLETTER

SUMMER 2020

## COVID-19 MEASURES

EPCOR continues to deliver safe and clean drinking water to our customers in French Creek. As governments across Canada and the U.S. proceed with the early stages of re-opening economies, it provides both a sense of optimism and time for careful consideration. At EPCOR, we will take a cautious approach, being a mid-to-late adopter of relaxed measures. This allows us to observe the impacts of changes in communities and then make informed decisions, every step of the way.

As of June 15, we have reinstated non-essential services, including meter replacement inspection or maintenance. Our physical office location remains closed to the public but our team can be reached during normal business hours via phone and email.

We will continue to closely monitor COVID-19 and provide updates as they affect customer services.

## New Water Rates 2021-2023

EPCOR's application to the B.C. Comptroller of Water Rights for new revenue requirements and water rates for the period from January 1, 2021, to December 31, 2023, is expected to be submitted later this summer.

As with previous rate applications, the B.C. Comptroller of Water Rights will review the forecast costs and proposed rates in a regulatory process that includes opportunities for customer input.

You can find more information on our website.

## Contribution in Aid of Construction (CIAC) Application

In June 2020, we applied to the B.C. Comptroller of Water Rights to revise a charge applicable to developers or new development customers applying to become part of the French Creek water utility. This charge has not increased to keep up with inflation since it was last changed in September 2015. This change will ensure that revenue collected from developers remains in line with EPCOR's costs to expand waterworks capacity for the benefit of developers or new development customers and ensures equity across customers joining the system at different points in time.

The new CIAC charge will remain interim and refundable, subject to a final decision by the Comptroller of Water Rights. For more information on how you can participate in the regulatory process, visit [epcor.com](http://epcor.com)





## Wellhead Protection Program

EPCOR relies on groundwater wells to supply drinking water to French Creek. A wellhead is the physical structure of the well above ground. A wellhead protection area is the area around the wellhead where land use activities have the potential to affect the quality of water that flows into the well. Pollutants can sometimes seep into the ground and contaminate the water in a well.

Wellhead protection is a good way to prevent drinking water from becoming polluted. EPCOR has developed a wellhead protection program in order to protect the wells that distribute water to French Creek residents. A well protection plan contains practical, protective measures to minimize and prevent undesirable impacts from land use activities on the source of water for the community wells. This includes identifying potential sources of pollution or contamination, examining the risks posed by each potential source and developing a mitigation plan to address the identified risks.

## Community Advisory Panel (CAP) Update

The 2019-2021 CAP is made up of 11 customers who will help us better understand the community's priorities around drinking water and provide input on a variety of water-related topics.

While in-person meetings have been postponed indefinitely, we held our last meeting on May 12, 2020, via Zoom and plan to continue in this manner until further notice. At our past meeting, we discussed the updated 2020 Master Plan and the 2021-2023 Rates Application, and responded to questions from CAP members.

## Watering Restrictions

We are currently in Stage 2 Watering Restrictions.

As we enter the drier summer months, we continue to work with the Regional District of Nanaimo and other local communities to determine proactive restrictions on water use.

Please refer to our website for any updates regarding restriction levels.

## Water Conservation Tips

Thank you for your continued cooperation in using water wisely. Here are a few tips to continue conserving in your yard.

- Set your sprinklers to ensure the water is only spraying your lawn rather than your home, sidewalk or street.
- Pay close attention to the condition of your water features (ponds, fountains and waterfalls) to ensure they don't use more water than they should.
- Check the root zone of your lawn or garden for moisture with a spade before watering. If it's still moist two inches under the soil surface, you still have enough water.
- Scatter soft grass clippings on your lawn. This will help replenish up to 40% of the applied nitrogen back to the lawn as the clippings break down. A mulching mower will help speed the breakdown of the clippings.

For more information on wise water use, please visit [www.epcor.com](http://www.epcor.com)



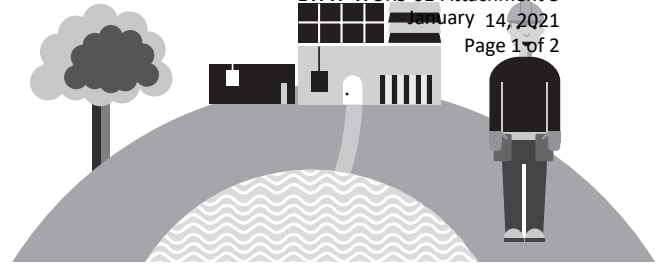
### Contact Us

EPCOR's office is open  
Monday to Friday, 8:00 a.m. – 4:30 p.m.  
We are closed from 12:00 – 12:30 p.m.

The office will be closed for the following holidays:  
August 3 and September 7, 2020.

Phone: 250-951-2460 Fax: 250-954-0361  
Emergency Phone: 250-954-5337  
E-mail: [frenchcreek@epcor.com](mailto:frenchcreek@epcor.com)  
#10D, 1343 Alberni Hwy  
Parksville, B.C. V9P 2B9  
[www.epcor.com](http://www.epcor.com)

EPCOR  
FRENCH  
CREEK



# EPCOR FRENCH CREEK NEWSLETTER

FALL 2020



Thank you for conserving water these past few months. Your efforts combined with a mild summer allowed us ensure adequate water levels for personal use and fire protection. Water restrictions will return to Stage One on October 1, 2020.

## Water Rates Update

On September 9, 2020, we filed our application with the B.C. Comptroller of Water Rights to set water rates for the 2021-2023 period. The application and information about the approval process can be viewed on our website.

## Cross Connection Policy

**Irrigation Maintenance:** A cross connection is an actual or potential connection between a potable water system and any source of potential pollution or contamination. It is vital to protect cross connections in order to prevent backflow into potable water.

EPCOR prevents backflow from entering the drinking water system by using a backflow prevention device.

Cross connection contamination may occur within an irrigation system when an air compressor is used to blow out an irrigation line without properly closing the irrigation supply valve or by not having the proper backflow preventer in place. This can cause air compressor contaminants, such as particles and oils, to enter and pollute the water system.

If you have any questions about blowing out your irrigation lines or other possible cross connections, please don't hesitate to contact us.



**Hot Water Tanks:** Atmospheric Vacuum Breaker (AVB) switches are a type of cross connection control to prevent back siphonage from your hot water tank into the public water supply.

If you are changing out your hot water tank, EPCOR recommends that you ensure your plumber installs an AVB switch on your system.

### Shutting Off Water at the Meter

It is sometimes necessary for water service to be shut off at the water meter for plumbing repairs. If this is necessary, please do not do this yourself. Damage to the water meter and subsequent repairs or replacement is the property owner's responsibility.

If you require your water to be shut off at the meter to attend to plumbing repairs, please contact our office and we will send one of our staff to look after this for you at no charge.

### Fall Cleaning

As you prepare your yard for winter, please pay extra attention to the area around your water meter and nearby fire hydrant. Trimming shrubs and trees and arranging landscaping away from these objects will make meter reading easier and allow emergency personnel quicker access.

For irrigation systems, fall is the time to inspect and prepare your lines to protect them from frost damage. To winterize your system, drain the lines thoroughly and close all valves before clearing the lines with air. It is important to ensure your system is closed before cleaning so there is no possibility of cross contamination of the public water system.

For more information on the proper care of your system, please consult your local irrigation parts and service supplier.

### Contact Us

EPCOR's office is open Monday to Friday, 8:00 a.m. – 4:30 p.m. We are closed from 12:00 – 12:30 p.m.

The office will be closed for the following holidays: October 12, November 11, December 25 and 28, 2020, and January 1, 2021.

Phone: 250-951-2460 Fax: 250-954-0361

Emergency Phone: 250-954-5337

E-mail: frenchcreek@epcor.com

#10D, 1343 Alberni Hwy

Parksville, B.C. V9P 2B9

epcor.com

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