



Appendix A

EPCOR WATER SERVICES

2025-2027 WASTEWATER SERVICES

Summary of Bylaw and Key Changes

May 31, 2024

APPENDIX A - Part 1

SUMMARY OF THE EPCOR WASTEWATER SERVICES BYLAW AND KEY CHANGES

1.0 OVERVIEW OF THE PROPOSED WASTEWATER SERVICES BYLAW**1.1 Overview**

Through the Wastewater Services Bylaw, EWS seeks approval for the following:

- Extension of the PBR from April 1, 2025 to December 31, 2027;
- Inclusion of a PBR formula to set rates based on routine and non-routine adjustments commencing April 1, 2025;
- The addition of seven new Service Charges in Schedule 1, Part III of the Bylaw;
- Updated Terms and Conditions of Wastewater Collection and Wastewater Treatment Services that govern the relationship between EWS and its customers. The majority of the proposed changes add clarity, improve consistency and readability and eliminate duplications. Details of the proposed amendments (except changes of a more minor nature) are summarized in the table below. The remaining minor changes are set out in the blacklined version of the Bylaw;
- Special Rate Adjustments for Wastewater Services, including special rate adjustments for: the fixed and variable charges to rebase the revenue requirement based on forecast costs for the PBR term; and for the consumption deferral account;
- The Inflation factor applied each year to prior year's Wastewater Collection Services rates to be calculated based on a weighting of 40% non-labour component and 60% labour component to represent Wastewater Collection Services operations internal cost structure (Schedule 3);
- The Inflation factor applied each year to prior year's Wastewater Treatment rates to be calculated based on a weighting of 65% non-labour component and 35% labour component to represent Wastewater Treatment operations internal cost structure (Schedule 3);
- Maintain the Efficiency factor from the previous PBR term at 0.25% for Wastewater Treatment fixed monthly service charges and consumption charges, wastewater overstrength surcharges and wastewater additional overstrength surcharges;
- Change the Efficiency factor for the 2025-2027 PBR term for Sanitary Utility fixed monthly service charges, Sanitary Utility variable monthly charges and Stormwater

Utility rates to 0.25% from the previous 0.50%; and

- Updates to Wastewater Services performance standards to ensure that the standards continue to be appropriate and achievable but also sufficiently rigorous to result in a high level of customer service. Substantive changes to the Performance Measures are described in detail in the table below and are in Schedule 3 of the Bylaw.

2.0 SUBSTANTIVE CHANGES FROM CURRENT DRAINAGE BYLAW TO PROPOSED DRAINAGE BYLAW

2.1 General

Reference:	Throughout Bylaw and Schedules
Current:	Drainage Services
Proposed:	Wastewater Collection Services
Rationale:	Throughout the Bylaw and its schedules, EWS proposes that references to “Drainage Services” be changed to “Wastewater Collection Services” in order to use nomenclature that is industry standard. In addition, with EWS providing water, wastewater collection and wastewater treatment in the City of Edmonton, the proposed terminology change reflects EWS’s carriage of the full water cycle.

Reference:	Schedule 1, Price Schedule
Current:	N/A
Proposed:	Modifications for each rate description to standardize the layout and to the extent possible, the wording
Rationale:	<p>EWS has proposed modifications for each rate description to standardize the layout and to the extent possible, the wording. Unless otherwise documented in this Appendix A, these modifications are of a minor nature intended to improve readability.</p> <p>Although these changes are minor in nature, EWS has flagged them in order to explain the number of changes shown in the blacklined version of Schedule 1.</p>

2.2 Bylaw

Reference:	Bylaw, Definitions
Current:	Addition of definitions to section 2 'Definitions'
Proposed:	<p>“Commercial Service” means a service provided to a Premises not otherwise defined as a Residential Service or Multi-Residential Service;</p> <p>“Multi-Residential Service” means a service provided to a Premises used primarily for domestic purposes where more than four separate dwelling units are metered by a single water meter;</p> <p>“Premises” means a parcel of land and any buildings situated on that land;</p> <p>“Residential Service” means a service provided to a premises used primarily for domestic purposes, where no more than four separate dwelling units are metered by a single water meter and the water service line to the premises is not greater than 50 millimeters in diameter;</p>
Rationale:	EWS forecasts and reports on revenues by customer class. To accurately reflect this and to provide consistency with the wording in Schedule 1 of EPCOR Water Services Bylaw 19626, EWS proposes these definitions be added in order to allow for the proposed amendments to Schedule 1, which are outlined below. By adding the definitions to the Bylaw, unnecessary repetition is avoided and the flow of the document is improved.

2.2.1 Schedule 1 Price Schedule

Reference:	Current: Schedule 1, Part I – Sanitary and Stormwater Rates, Rate Sheet 1 New: Schedule 1, Part I: Sanitary Utility Rates
Current:	Applicable To all domestic service Customers within the city of Edmonton
Proposed:	Applicable To all domestic service Residential Service, Multi-Residential Service and Commercial Service Customers within the city of Edmonton
Rationale:	EWS forecasts and reports on revenues by customer class. To accurately reflect this and to provide consistency with the wording in Schedule 1 of EPCOR Water Services Bylaw 19626, EWS proposes that the wording be amended.

Reference:	Current: Schedule 1, Part I – Sanitary and Stormwater Rates, Rate Sheet 1 New: Schedule 1, Part I: Sanitary Utility Rates
Current:	References to “flat monthly charges”
Proposed:	Changed to “fixed monthly charges”
Rationale:	<p>EWS’s utilities have fixed and variable charges. Throughout EPCOR Drainage Services Bylaw 19627, EWS used the term ‘flat’ to describe fixed monthly charges and throughout the EPCOR Water Services Bylaw 19626, EWS uses the term fixed to describe the fixed monthly charges.</p> <p>In order to maintain consistency between the bylaws, EWS proposes to change the terminology in the new Wastewater Services bylaw to align with the terminology used in EPCOR Water Services Bylaw 19626. As flat has been used interchangeably with fixed, the proposed wording change does not impact the charge itself.</p>

Reference:	Current: Schedule 1, Part I – Sanitary and Stormwater Rates, Rate Sheet 1, Variable Monthly Charge New: Schedule 1, Part I: Sanitary Utility Rates, Variable Monthly Charge									
Current:	<table border="1"> <thead> <tr> <th>Premises</th> <th>Rate per m³</th> </tr> </thead> <tbody> <tr> <td>All premises (except large wholesale)</td> <td>\$1.2493</td> </tr> <tr> <td>Large Wholesale* with Collection System</td> <td>\$0.6996</td> </tr> </tbody> </table>	Premises	Rate per m ³	All premises (except large wholesale)	\$1.2493	Large Wholesale* with Collection System	\$0.6996			
Premises	Rate per m ³									
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Proposed:	<table border="1"> <thead> <tr> <th>Premises</th> <th>Rate per m³</th> </tr> </thead> <tbody> <tr> <td>Residential Service All consumption</td> <td>\$1.2891 per m³</td> </tr> <tr> <td>Multi-Residential Service All consumption</td> <td>\$1.2568 per m³</td> </tr> <tr> <td>Commercial Service All premises (except large wholesale) Large Wholesale* with Collection System</td> <td>\$1.1212 per m³ \$0.6909 per m³</td> </tr> </tbody> </table>	Premises	Rate per m ³	Residential Service All consumption	\$1.2891 per m ³	Multi-Residential Service All consumption	\$1.2568 per m ³	Commercial Service All premises (except large wholesale) Large Wholesale* with Collection System	\$1.1212 per m ³ \$0.6909 per m ³	
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Rationale:	In order to align with the proposed change to include customer classes, EWS proposes this table to include the specific customer classes with the Variable Monthly Charge.									

Reference:	Current: Schedule 1, Part I – Sanitary and Stormwater Rates, Rate Sheet 1 and Rate Sheet 2 New: Schedule 1, Part I: Sanitary Utility Rates Schedule 1, Part II: Stormwater Utility Rate
Current:	Sanitary and stormwater rates are currently included together in Part I: Sanitary and Stormwater Rates, with sanitary being under Rate Sheet 1 and stormwater under Rate Sheet 2.
Proposed:	Sanitary and stormwater will each have their own part. Rate Sheet 1 will be changed to Part I: Sanitary Utility Rates. Rate Sheet 2 will be changed to Part II: Stormwater Utility Rate.
Rationale:	Although these changes are minor in nature, EWS has flagged them in order to explain the number of changes shown in the blacklined version of Schedule 1.

Reference:	Current: Schedule 1, Part I – Sanitary and Stormwater Rates, Rate Sheet 2 New: Schedule 1, Part II: Stormwater Utility Rate																
Current:	Runoff Coefficient Tables The following tables shall be in effect until March 31, 2025. <u>Existing Drainage Services</u> For Premises incurring charges for Drainage Services prior to January 1, 2024, the following shall apply: <table border="1" data-bbox="418 1415 1419 1860"> <thead> <tr> <th>R</th> <th>Zoning</th> </tr> </thead> <tbody> <tr> <td>0.10</td> <td>AG</td> </tr> <tr> <td>0.20</td> <td>A, RR</td> </tr> <tr> <td>0.30</td> <td>AP, US (schools)</td> </tr> <tr> <td>0.50</td> <td>RF1, RF2, RF3, RF4, RMH, IH, MA, AGU</td> </tr> <tr> <td>0.65</td> <td>RSL, RF5, RF6, RA7, RPL</td> </tr> <tr> <td>0.75</td> <td>RA8, US (except schools), PU</td> </tr> <tr> <td>0.90</td> <td>RA9, RMX, CNC, CSC, CB1, CHY, CO,</td> </tr> </tbody> </table>	R	Zoning	0.10	AG	0.20	A, RR	0.30	AP, US (schools)	0.50	RF1, RF2, RF3, RF4, RMH, IH, MA, AGU	0.65	RSL, RF5, RF6, RA7, RPL	0.75	RA8, US (except schools), PU	0.90	RA9, RMX, CNC, CSC, CB1, CHY, CO,
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		IB, IM, AGI, DC
	0.95	CB2, CMX
<p><u>New Drainage Services</u></p> <p>For Premises which begin to incur charges for Drainage Services on or after January 1, 2024, the following shall apply:</p>		
	R	Zoning
	0.1	AG, NA
	0.2	RR, A
	0.3	PS, PSN
	0.5	RS, FD, IH
	0.65	RSF, RSM, RM, PS (schools)
	0.75	UF, PU, UI
	0.9	RL, BE, IM, CG, CB, CN, MU, MUN, AJ, DC, DC1, DC2
Proposed:	<p>Runoff Coefficient Tables</p> <p>The following tables shall be in effect until December 31, 2027. March 31, 2025.</p> <p><u>Existing Drainage Services</u></p> <p>For Premises incurring charges for Drainage Services prior to January 1, 2024, the following shall apply:</p>	
	R	Zoning
	0.10	AG
	0.20	A, RR
	0.30	AP, US (schools)
	0.50	RF1, RF2, RF3, RF4, RMH, IH, MA, AGU
	0.65	RSL, RF5, RF6, RA7, RPL
	0.75	RA8, US (except schools), PU

	0.90	RA9, RMX, CNC, CSC, CB1, CHY, CO, IB, IM, AGI, DC
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<p><u>New Drainage Services</u></p> <p>For Premises which begin to incur charges for Drainage Services on or after January 1, 2024, the following shall apply:</p>		
	R	Zoning
	0.1	AG, NA
	0.2	RR, A
	0.3	PS, PSN
	0.5	RS, FD, IH
	0.65	RSF, RSM, RM, PS (schools)
	0.75	UF, PU, UI
	0.9	RL, BE, IM, CG, CB, CN, MU, MUN, AJ, DC, DC1, DC2
	Runoff Coefficient	Zoning Designation
	0.2	A, AG, NA, RR, RVSA
	0.3	PS, PSN
	0.4	FD
	0.5	AJ, RS/RSF(≥450m²)
	0.55	DC(<700m²), PU, RM/RSM(≥450m²), RS/RSF(<450m²), UF
	0.6	DC(≥700m²), RL, RM/RSM(<450m²), UI
	0.65	CN, MUN
	0.75	BE, CB, CG, IH, IM, MU
Rationale:	Stormwater utility charges are based on the following formula: stormwater utility charge = A x I x R x rate. In this formula, R is the runoff coefficient based on the zoning of the Premises. EWS has revised the stormwater runoff	

	<p>coefficient table in order to align with the new zones contained in Zoning Bylaw 20001, and based on an average runoff by zoning code assessment of all parcels in the city.</p> <p>For Premises incurring charges from January 1, 2024 onwards, the previous zoning designations would no longer apply. Accordingly, as an interim measure until the next PBR, in 2023 EWS amended the runoff coefficient table for Premises first incurring Wastewater Collection Services charges on January 1, 2024 or later in order to align with Zoning Bylaw 20001. For the term commencing April 1, 2025, EWSI will assign a runoff coefficient from the proposed table to all Premises receiving Wastewater Collection Services.</p>
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Reference:	<p>Current: Schedule 1, Part II, Service Fees and Charges</p> <p>New: Schedule 1, Part III: Service Fees and Charges and Sanitary Sewer Trunk Charges</p>																
Current:	<p>1. Application Fees</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 70%;">Application Type</th> <th style="width: 30%;">2022 Fee</th> </tr> </thead> <tbody> <tr> <td>Application to release matter</td> <td style="text-align: right;">\$189.58</td> </tr> <tr> <td>Application to approve a compliance program</td> <td style="text-align: right;">Subject to estimate based on cost of service</td> </tr> <tr> <td>Records search</td> <td style="text-align: right;">\$142.06</td> </tr> <tr> <td>Application for reduction in stormwater utility credit</td> <td></td> </tr> <tr> <td style="padding-left: 20px;">Initial application</td> <td style="text-align: right;">\$240.00</td> </tr> <tr> <td style="padding-left: 20px;">Renewal application</td> <td style="text-align: right;">\$225.00</td> </tr> <tr> <td>Application for sanitary utility credit</td> <td style="text-align: right;">\$400.00</td> </tr> </tbody> </table>	Application Type	2022 Fee	Application to release matter	\$189.58	Application to approve a compliance program	Subject to estimate based on cost of service	Records search	\$142.06	Application for reduction in stormwater utility credit		Initial application	\$240.00	Renewal application	\$225.00	Application for sanitary utility credit	\$400.00
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Proposed:	Wastewater Collection Services																

	Application Type	2025 Fee
	Application to release matter	\$189.58 \$210.00
	Application to approve a compliance program	Subject to estimate based on cost of service
	Records search	\$142.06 \$175.00
	Application for stormwater intensity adjustment Initial application Renewal application	\$200.00 \$240.00 \$225.00
	Application for sanitary utility credit	\$400.00 \$430.00
Rationale:	<p>The 'Application to release matter' fee has been kept low, despite the cost to EWS being significantly more than \$210.00. EWS is concerned that increasing it closer to EWS's cost of service will disincentivize Customers from following the Code of Practice, potentially resulting in illegal dumping. Accordingly, the proposed increase is minimal.</p> <p>The 'Stormwater utility credit' has been renamed to 'Stormwater intensity adjustment' to better reflect how the 'I' factor adjustment is reflecting that the parcel has a significantly different runoff pattern than the average for that zoning code and is eligible for a rate adjustment via a change to the I factor. The cost of the initial application has been reduced to reflect a streamlined approach to reviewing these applications. There is no longer a need for the renewal application as there were minimal changes seen at renewal period from original application and therefore it has been removed.</p> <p>The records search cost has increased; however, EWS's actual costs remain at approximately \$200 per search. EWS is undertaking a staged adjustment to these costs to move towards a full cost of service recovery. The records application is primarily for customers requiring records on properties as part of the environmental due diligence for commercial real estate transactions.</p>	

Reference:	Current: Schedule 1, Part II, Service Fees and Charges New: Schedule 1, Part III: Service Fees and Charges and Sanitary Sewer Trunk Charges		
Current:	N/A		
Proposed:	<p>Account Application Charges</p> <p>To all Customers who apply for a new account or change accounts for Wastewater Collection Services within the city of Edmonton boundaries. If a Customer is applying for a new Water Services account at the same time, this fee will only be charged once.</p> <table border="1" data-bbox="431 825 1369 888"> <tr> <td>2025 Account Application Fee</td> <td>\$25.00</td> </tr> </table>	2025 Account Application Fee	\$25.00
2025 Account Application Fee	\$25.00		
Rationale:	The proposed fee aligns with EPCOR Water Services Bylaw 19626 and allows EWS to charge an account fee for sanitary or storm only services. As described in the proposed wording, a Customer will only be charged this fee once if they are simultaneously opening a Water Services account.		

Reference:	Current: Schedule 1, Part II, Service Fees and Charges New: Schedule 1, Part III: Service Fees and Charges and Sanitary Sewer Trunk Charges		
Current:	N/A		
Proposed:	<p>Hauled Wastewater</p> <p>The account application fee for Hauled Wastewater is:</p> <table border="1" data-bbox="431 1551 1369 1650"> <tr> <td>2025 Hauled Wastewater Account Application Fee</td> <td>\$35.00</td> </tr> </table>	2025 Hauled Wastewater Account Application Fee	\$35.00
2025 Hauled Wastewater Account Application Fee	\$35.00		
Rationale:	The proposed fee aligns with EPCOR Water Services Bylaw 19626 as that bylaw contains an application fee for the truck fill service, which EWS considers to be an analogous service to hauled wastewater.		

Reference:	Current: Schedule 1, Part II, Service Fees and Charges New: Schedule 1, Part III: Service Fees and Charges and Sanitary Sewer Trunk Charges		
Current:	N/A		
Proposed:	<p>Notice to Comply Subsequent Inspection Fee</p> <p>To all customers in contravention of Schedule 2 Terms and Conditions of Wastewater Collection and Wastewater Treatment Services that have been issued a notice to comply by EWSI for the contravention.</p> <table border="1" data-bbox="410 640 1416 741"> <tr> <td>2025 Notice to Comply Subsequent Inspection Fee</td> <td>\$250.00</td> </tr> </table>	2025 Notice to Comply Subsequent Inspection Fee	\$250.00
2025 Notice to Comply Subsequent Inspection Fee	\$250.00		
Rationale:	When EWS becomes aware that a customer is in contravention of Schedule 2 Terms and Conditions of Wastewater Collection and Wastewater Treatment Services, EWS provides education to the customer, as appropriate, and issues a notice to comply in order to rectify the breach. Generally, for these breaches, EWS will attend the facility and complete a site inspection. The proposed fee is requested for instances when EWS must subsequently attend a customer’s site for the same contravention and finds continued non-compliance. The fee represents the estimated costs associated with the EWS vehicle deployed for re-inspection and the cost of one hour of two EWS investigators’ time.		

Reference:	Current: Schedule 1, Part II, Service Fees and Charges New: Schedule 1, Part III: Service Fees and Charges and Sanitary Sewer Trunk Charges		
Current:	<p>Investigation Fee</p> <p>To all Customers who request EWSI to investigate sewer trouble where the result of the investigation indicates that the sewer trouble is caused by a private plumbing issue.</p> <table border="1" data-bbox="433 1724 1416 1818"> <tr> <td>2022 Investigation Fee</td> <td>\$200.00 for second and subsequent appointments</td> </tr> </table>	2022 Investigation Fee	\$200.00 for second and subsequent appointments
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<p>Proposed:</p>	<p>Investigation Fee</p> <p>To all Customers who request EWSI to investigate sewer trouble where the result of the investigation indicates that the sewer trouble is caused by a private plumbing issue.</p> <table border="1" data-bbox="435 483 1416 634"> <tr> <td>2025 Initial Investigation Fee</td> <td>\$410.00</td> </tr> <tr> <td>2025 Subsequent Investigation Fee</td> <td>\$220.00 for second and subsequent appointments</td> </tr> </table> <p>Removal of Obstruction Fee</p> <p>To all Customers who request EWSI remove an obstruction caused by a private plumbing issue or on the private side of the Wastewater Collection Service. For clarity, EWSI is required to investigate prior to removing the obstruction and both fees will be applied.</p> <table border="1" data-bbox="422 1024 1416 1121"> <tr> <td>2025 Obstruction Removal Fee – Removal only</td> <td>\$255.00</td> </tr> </table>	2025 Initial Investigation Fee	\$410.00	2025 Subsequent Investigation Fee	\$220.00 for second and subsequent appointments	2025 Obstruction Removal Fee – Removal only	\$255.00
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2025 Obstruction Removal Fee – Removal only	\$255.00						
<p>Rationale:</p>	<p>Currently, the ‘Initial Investigation’ and ‘Removal of Obstruction Fees’ are on EWS’s website and referenced in the Drainage Services Guidelines. Although the proposed changes are to fees that are more commercial in nature, EWS, as the regulated utility provider, is often a Customer’s first call. The proposed changes will keep all sewer service investigation and removal related fees in the same location, thereby increasing clarity for Customers. For service calls, EWS informs Customers that they have the choice of service provider and they may use a private firm instead of EWS to complete the service.</p>						

<p>Reference:</p>	<p>Current: Schedule 1, Part II, Service Fees and Charges New: Schedule 1, Part III: Service Fees and Charges and Sanitary Sewer Trunk Charges</p>
<p>Current:</p>	<p>N/A</p>

<p>Proposed:</p>	<p>EWSI Missed Appointment Credit</p> <p>For instances in which EWSI does not keep a scheduled appointment for a Customer without giving reasonable notice.</p> <table border="1" data-bbox="431 485 1369 537"> <tr> <td data-bbox="431 485 930 537">2025 Missed Appointment Credit</td> <td data-bbox="930 485 1369 537">\$35.00</td> </tr> </table>	2025 Missed Appointment Credit	\$35.00
2025 Missed Appointment Credit	\$35.00		
<p>Rationale:</p>	<p>This credit is in EPCOR Water Services Bylaw 19626. The proposed change increases alignment between the bylaws and provides the customer with a credit if EWS misses a scheduled appointment with insufficient notice.</p>		

<p>Reference:</p>	<p>New: Schedule 1, Part III: Service Fees and Charges and Sanitary Sewer Trunk Charges</p>		
<p>Current:</p>	<p>N/A</p>		
<p>Proposed:</p>	<p>Customer Locate Fee</p> <p>To all Customers who fail to notify EWSI they have taken possession of a site and EWSI is required to conduct searches to identify the Customer.</p> <table border="1" data-bbox="418 1224 1417 1276"> <tr> <td data-bbox="418 1224 976 1276">Customer Locate Fee</td> <td data-bbox="976 1224 1417 1276">\$20.00</td> </tr> </table>	Customer Locate Fee	\$20.00
Customer Locate Fee	\$20.00		
<p>Rationale:</p>	<p>This provision is currently in EPCOR Water Services Bylaw 19626. This change is requested to cover the costs associated with locating customers who have taken possession of a site (with storm or sanitary only accounts) but have not informed EWS. The \$20.00 fee will cover the cost of obtaining the land title (approximately \$10.00) and the remaining \$10.00 will cover the administration costs that are involved in conducting the searches.</p>		

<p>Reference:</p>	<p>New: Schedule 1, Part III: Service Fees and Charges and Sanitary Sewer Trunk Charges</p>
<p>Current:</p>	<p>N/A</p>

<p>Proposed:</p>	<p>Tampering or Unauthorized Use Charge</p> <p>To all Customers for whom EWSI must investigate, repair, or replace damaged sanitary, storm or combined sewer infrastructure as a result of unauthorized use or tampering.</p> <table border="1" data-bbox="431 478 1409 533"> <tr> <td data-bbox="431 478 971 533"> <p>2025 Tampering Fee</p> </td> <td data-bbox="971 478 1409 533"> <p>Cost to repair plus \$250.00</p> </td> </tr> </table>	<p>2025 Tampering Fee</p>	<p>Cost to repair plus \$250.00</p>
<p>2025 Tampering Fee</p>	<p>Cost to repair plus \$250.00</p>		
<p>Rationale:</p>	<p>This charge is currently in EPCOR Water Bylaw 19626. The proposed change maintains alignment between the bylaws and allows EWS to charge third parties who have an impact on the sanitary, storm or combined systems through their actions.</p>		

<p>Reference:</p>	<p>New: Schedule 1, Part III: Service Fees and Charges and Sanitary Sewer Trunk Charges</p>
<p>Current:</p>	<p>N/A</p>
<p>Proposed:</p>	<p>Late Payment Charges</p> <p>A late payment charge of 2.5% per month, not compounded, is applied to all charges on a Customer’s account, if the Customer’s payment has not been received by EWSI in full by the payment date specified on the bill. If considered to be interest payable for credit advanced, then the late payment charge is equivalent to a maximum yearly rate of 45.6%. A dishonoured cheque charge of \$25.00 is applied for each cheque returned for insufficient funds.</p>
<p>Rationale:</p>	<p>This provision is currently in EPCOR Water Services Bylaw 19626. This change is requested to ensure consistency with billing between the two utilities. It allows EWS to charge for late payments for storm or sanitary only accounts.</p>

<p>Reference:</p>	<p>Current: Schedule 1, Part III: Wastewater Treatment Rates New: Schedule 1, Part IV: Wastewater Treatment Rates</p>
<p>Current:</p>	<p>Applicable To all domestic service Customers and multi-residential service Customers located within the city of Edmonton which are serviced by or connected to the City’s sewerage system.</p>

	<p>A domestic service is defined as a service supplied to premises used primarily for domestic purposes, where no more than four separate dwelling units are metered by a single water meter and the service line to the premises is not greater than 50 millimeters in diameter.</p>
<p>Proposed:</p>	<p>Applicable To all domestic service Residential Service, Multi-Residential Service and Commercial Service Customers within the city of Edmonton who are serviced by or connected to the sanitary system.</p> <p>If a business is conducted from premises that otherwise fall within the above definition of a domestic service Residential Service or Multi-Residential Service, Commercial Wastewater Treatment Service rates apply; provided however, that if a portion of the premises from which the business is conducted is separately metered, then a Commercial Wastewater Treatment Services rate will apply only to that portion of the premises.</p>
<p>Rationale:</p>	<p>As detailed in the rationale for the proposed change to Schedule 1, Part I: Sanitary Utility Rate, EWS forecasts and reports on revenues by customer class. To accurately reflect this and to provide consistency with the wording in Schedule 1 of EPCOR Water Services Bylaw 19626, EWS proposes that the wording be amended.</p>

<p>Reference:</p>	<p>Current: Schedule 1, Part III: Wastewater Treatment Rates New: Schedule 1, Part IV: Wastewater Treatment Rates</p>
<p>Current:</p>	<p>References to "flat monthly charges"</p>
<p>Proposed:</p>	<p>Changed to "fixed monthly charges"</p>
<p>Rationale:</p>	<p>EWS's utilities have fixed and variable charges. Throughout EPCOR Drainage Services Bylaw 19627, EWS used the term 'flat' to describe fixed monthly charges and throughout the EPCOR Water Services Bylaw 19626, EWS uses the term fixed to describe the fixed monthly charges.</p> <p>In order to maintain consistency between the bylaws, EWS proposes to change the terminology in the new Wastewater Services bylaw to align with</p>

	the terminology used in EPCOR Water Services Bylaw 19626. As flat has been used interchangeably with fixed, the proposed wording change does not impact the charge itself.
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Reference:	Current: Schedule 1, Part III: Wastewater Treatment Rates New: Schedule 1, Part IV: Wastewater Treatment Rates						
Current:	<p style="text-align: center;">Residential Wastewater Treatment Service</p> <p style="text-align: center;">...</p> <p>Consumption Charge*</p> <p style="text-align: right;">All consumption \$1.2334 per m³</p> <p style="text-align: center;">...</p> <p style="text-align: center;">Commercial Wastewater Treatment Service</p> <p style="text-align: center;">...</p> <p style="text-align: center;">Consumption Charge *</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">0 m³ – 10,000.0 m³</td> <td style="text-align: right;">\$1.2334 per m³</td> </tr> <tr> <td>10,000.1 m³ – 100,000.0 m³</td> <td style="text-align: right;">\$0.9542 per m³</td> </tr> <tr> <td>Over 100,000.0 m³</td> <td style="text-align: right;">\$0.4979 per m³</td> </tr> </table>	0 m ³ – 10,000.0 m ³	\$1.2334 per m ³	10,000.1 m ³ – 100,000.0 m ³	\$0.9542 per m ³	Over 100,000.0 m ³	\$0.4979 per m ³
0 m ³ – 10,000.0 m ³	\$1.2334 per m ³						
10,000.1 m ³ – 100,000.0 m ³	\$0.9542 per m ³						
Over 100,000.0 m ³	\$0.4979 per m ³						
Proposed:	<p style="text-align: center;">Residential Wastewater Treatment Service</p> <p style="text-align: center;">...</p> <p>Consumption Charge*</p> <hr style="border: 1px solid blue;"/> <p style="text-align: right;">All consumption \$1.2334 per m³</p> <p style="text-align: center;">...</p> <p style="text-align: center;">Commercial Wastewater Treatment Service</p> <p style="text-align: center;">...</p> <hr style="border: 1px solid blue;"/> <p style="text-align: center;">Consumption Charge *</p> <hr style="border: 1px solid blue;"/> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">0 m³ – 10,000.0 m³</td> <td style="text-align: right;">\$1.2334 per m³</td> </tr> <tr> <td>10,000.1 m³ – 100,000.0 m³</td> <td style="text-align: right;">\$0.9542 per m³</td> </tr> <tr> <td>Over 100,000.0 m³</td> <td style="text-align: right;">\$0.4979 per m³</td> </tr> </table>	0 m³ – 10,000.0 m³	\$1.2334 per m³	10,000.1 m³ – 100,000.0 m³	\$0.9542 per m³	Over 100,000.0 m³	\$0.4979 per m³
0 m³ – 10,000.0 m³	\$1.2334 per m³						
10,000.1 m³ – 100,000.0 m³	\$0.9542 per m³						
Over 100,000.0 m³	\$0.4979 per m³						

	<p>Variable Charge</p> <p>The Variable Charge is levied on each Premises based on metered flow, measured by one of the following:</p> <ul style="list-style-type: none"> i. water consumption for the premises; ii. sewer discharge for a premises on which a sewer meter has been installed in accordance with this bylaw; or iii. water consumption for the premises as discounted by the application of a utility credit as approved in accordance with this bylaw. <p>The Variable Rates for the period April 1, 2025 – December 31, 2025 are set out below:</p> <table border="1" data-bbox="418 955 1416 1400"> <thead> <tr> <th>Monthly Consumption</th> <th>Rate per m³</th> </tr> </thead> <tbody> <tr> <td>Residential Service All consumption</td> <td>\$1.2883 per m³</td> </tr> <tr> <td>Multi-Residential Service All consumption</td> <td>\$1.2575 per m³</td> </tr> <tr> <td>Commercial Service 0 m³ – 10,000.0 m³</td> <td>\$1.1486 per m³</td> </tr> <tr> <td>10,000.1 m³ – 100,000.0 m³</td> <td>\$0.8886 per m³</td> </tr> <tr> <td>Over 100,000.0 m³</td> <td>\$0.4636 per m³</td> </tr> </tbody> </table> <p>Variable Rates for the period January 1, 2026 to December 31, 2027 will be determined by applying the adjustment factors in Schedule 3 of this Bylaw to the rates set out above, with new rate approval and implementation occurring on an annual basis in accordance with the adjustment methodology prescribed in Section 8 of this Bylaw.</p>	Monthly Consumption	Rate per m ³	Residential Service All consumption	\$1.2883 per m ³	Multi-Residential Service All consumption	\$1.2575 per m ³	Commercial Service 0 m ³ – 10,000.0 m ³	\$1.1486 per m ³	10,000.1 m ³ – 100,000.0 m ³	\$0.8886 per m ³	Over 100,000.0 m ³	\$0.4636 per m ³
Monthly Consumption	Rate per m ³												
Residential Service All consumption	\$1.2883 per m ³												
Multi-Residential Service All consumption	\$1.2575 per m ³												
Commercial Service 0 m ³ – 10,000.0 m ³	\$1.1486 per m ³												
10,000.1 m ³ – 100,000.0 m ³	\$0.8886 per m ³												
Over 100,000.0 m ³	\$0.4636 per m ³												
<p>Rationale:</p>	<p>In order to align with the proposed change to include customer classes, EWS proposes to amend this table to include the specific customer classes with the Variable Charge.</p>												

Reference:	<p>Current: Schedule 1, Part III: Wastewater Treatment Rate: Sanitary Utility Credit</p> <p>New: Schedule 1, Part IV: Wastewater Treatment Rates: Sanitary Utility Credit and Excess Sanitary Use Charge</p>
Current:	<p style="text-align: center;">Wastewater Treatment Rate: Sanitary Utility Credit</p> <p>Applicable To non-residential wastewater treatment service Customers who can clearly demonstrate that there is a water loss experience between their water consumed and their discharges to the sanitary sewer system on a continuous monthly basis.</p> <p>The Customer must submit a written application to EPCOR, as required by Schedule 2 to the Bylaw.</p>
Proposed:	<p style="text-align: center;">Sanitary Utility Credit and Excess Sanitary Use Charge</p> <p>Applicable To Commercial Service wastewater treatment service Customers who can clearly demonstrate that there is a water loss experience between their water consumed and their discharges to the sanitary sewer system on a continuous monthly basis.</p> <p>The Customer must submit a written application to EWSI, as required by Schedule 2 to the Bylaw.</p> <p>Excess Sanitary Use Charge</p> <p>Applicable Additional sanitary sewer charges may apply to Commercial Service Customers if the volume of water discharged to the sanitary sewer system from a Premises exceeds the water consumed by that Premises.</p>

Rationale:	The proposed addition is to address rare instances with certain commercial customers. Certain businesses may discharge an excess amount of wastewater to the sanitary sewer system, as compared to the water consumed by that Premises. In order to accurately capture the volume, the Customer would need to have a meter in place to measure the discharge; accordingly, the instances of this are rare, but EWS would like the authority to charge the sanitary sewer charge on the excess discharge for these unique occurrences.

Reference:	Schedule 1, Part IV: Wastewater Treatment Rates
Current:	<p>Overstrength surcharge (\$) =</p> $m_3 \{ (O_b (C_{xb} - 300) + O_c (C_{xc} - C_{ac}) + O_o (C_{xo} - 100) + O_p (C_{xp} - 10) + O_s (C_{xs} - 300) + O_n (C_{xn} - 50)) \}$ <p style="text-align: center;">100,000</p> <p>Where:</p> <ul style="list-style-type: none"> • m_3 is the total water consumption in cubic meters (or, if approved, sewer metering); • O_b, O_c, O_o, O_p, O_s and O_n are the Overstrength surcharge set out in Part IV for each kilogram of BOD, COD, oil and grease, phosphorus, suspended solids, and TKN, respectively. • $C_{xb}, C_{xc}, C_{xo}, C_{xp}, C_{xs}, C_{sn}$ are the average concentrations in milligrams per liter (mg/L) of BOD, COD, oil and grease, phosphorus, suspended solids and TKN, respectively, in the sampled wastewater. • C_{ac} is 600 or double the average BOD concentration in mg/L, whichever is greater. • The additional surcharge is calculated using the above formula but substituting 3000, 400, 75, 3000 and 200 for 300, 100, 10, 300 and 50, respectively, and C_{ac} is 6000 or double the average BOD concentration in mg/L, whichever is greater. • Where the remainder of a subtraction is a negative number, that component of the formula becomes equal to zero.
Proposed:	$S = \frac{V [P_B (C_B - 300) + P_C (C_C - C_A) + P_G (C_G - 100) + P_P (C_P - 10) + P_S (C_S - 300) + P_N (C_N - 50)]}{1000}$ <p>Where:</p> <ul style="list-style-type: none"> • S is the overstrength surcharge in dollars; • V is the total water consumption in cubic metres (m^3) (or, if approved, sewer metering);

	<ul style="list-style-type: none"> • $P_B, P_C, P_G, P_P, P_S,$ and P_N are the Overstrength surcharge set out in Part IV for each kilogram of BOD, COD, oil and grease, phosphorus, suspended solids, and TKN, respectively. • $C_B, C_C, C_G, C_P, C_S,$ and C_N are the average concentrations in milligrams per liter (mg/L) of BOD, COD, oil and grease, phosphorus, suspended solids and TKN, respectively, in the sampled wastewater. • C_a is 600 or double the average BOD concentration in mg/L, whichever is greater. • The additional surcharge is calculated using the above formula but substituting 3000, 400, 75, 3000 and 200 for 300, 100, 10, 300 and 50, respectively, and C_a is 6000 or double the average BOD concentration in mg/L, whichever is greater. • Where the remainder of a subtraction is a negative number, that component of the formula becomes equal to zero.
<p>Rationale:</p>	<p>The formula has been simplified in order to provide clarity. Additionally, EWS has changed the rates of its overstrength surcharge from cents to dollars and this necessitated the change to dividing by '1000' instead of '100,000'.</p>

2.2.2 Schedule 2 Terms and Conditions of Drainage Services

The following contains explanations for the more substantive changes to Schedule 2 – Terms and Conditions of Drainage Services.

General

Reference:	Schedule 2 – Terms and Conditions of Wastewater Collection and Wastewater Treatment Services
Proposed:	Schedule 2 was reviewed and minor changes have been to clean-up the Terms and Conditions, including by adding capitalized terms not previously defined, changing Drainage Services to Wastewater Collection Services and adding Wastewater Treatment Services where required.

Article 1 – Definitions and Interpretation

Reference:	1.1 Definitions
Current:	“Flow Monitoring Point” means an access point to Sewer Service or Private Drainage System for a premises, examples of which include manholes and dip wells;
Proposed:	“Flow Monitoring Point” means an access point to Sewer Service or Private Drainage System for a premises, examples of which include manholes maintenance holes and dip wells;
Rationale:	This change is requested to ensure diversity and inclusion by employing gender neutral language.

Article 4 – Sewer Connection Regulations

Reference:	5.7 Large Volume Releases
Current:	(a) No Person shall Release Wastewater that exceeds a volume of 10 cubic metres, into the Sewerage System except as permitted in this Article. (b) A Person may Release Wastewater that exceeds a volume of 10 cubic metres, into the Sewerage System if the Release is performed in accordance with the Large Volume Releases Code of Practice as established in the Drainage Service Guidelines established by EWS.
Proposed:	(a) No Person shall Release Wastewater that exceeds a cumulative volume of

	<p>10 cubic metres in a 24 hour period, into the Sewerage System except as permitted in this Article.</p> <p>(b) A Person may Release Wastewater that exceeds a cumulative volume of 10 cubic metres in a 24 hour period, into the Sewerage System if the Release is performed in accordance with the Large Volume Releases Code of Practice as established in the Drainage Service Guidelines established by EWS.</p>
Rationale:	The current wording lacks specificity as there is no time frame for the release and EWS has received customer feedback on the lack of time frame. The proposed change will provide clarity for customers.

2.2.3 Schedule 3 Performance Based Drainage Rates

2.2.3.1 Overview

1. EWS is proposing significant changes to Schedule 3 of the Bylaw. Rather than detailing each proposed change (which is set out in the blacklined version of the Bylaw), the information below identifies the substantive changes and provides a rationale for each change. The majority of these changes are driven by amendments to the performance indices and measures.

2.2.3.2 Wastewater Collection Services Quality

2. The following tables provide a summary of substantive proposed revisions to the Wastewater Collection System Service Quality performance indices in Section 3.0 of Schedule 3, including updates and the rationale for changes, as appropriate. The current performance measures for Wastewater Collection Services were introduced in January of 2020 and have only completed two partial reporting cycles.

3. EWS is proposing the following changes for specific performance measures:

Index	Measure	Description of Change	Rationale
Environmental	Green Hectares	Remove from PBR	Momentum for low impact development (key aspect of the Stormwater Integrated Resource Plan (SIRP)) largely achieved.
Environmental	Stormwater Rebate Projects	New Environmental Measure	New measure to shift focus towards building momentum to encourage additional low impact development

			investment on private properties.
Customer Service	Service Maintenance Calls	Move to System Reliability & Optimization	Measure reclassified as a system reliability & optimization measure.
Customer Service	Emergency Dig-Ups	Move to System Reliability & Optimization	Measure reclassified as a system reliability & optimization measure.
Customer Service	Sewer Odour Hotspots	Move to System Reliability & Optimization	Measure reclassified as a system reliability & optimization measure.
Customer Service	Stormwater Facility Response Time	New Customer Service Measure	New measure to assess response time to customer raised concerns regarding stormwater facilities.
Customer Service	Deficient Appurtenances Response Time	New Customer Service Measure	New measure to assess response time to customer raised concerns regarding deficient appurtenances on the wastewater collection system.
Customer Service	Sewer Odour Response Time	New Customer Service Measure	New measure to assess response time to customer raised concerns regarding odours attributed to the sewer system.
System Reliability & Optimization	Blocked Sewers	Remove from PBR	Blockages are the result of many factors outside the utility's control and EWS's maintenance practices will not show improved performance in short term. Other measures are in place to assess EWS's response to customers' immediate concerns.
System Reliability & Optimization	Sewer Renewal	Remove from PBR	The measure was developed on activities that have changed significantly. Project activity has decreased due to changes in risk-based investment needs.
System Reliability & Optimization	Infrastructure Condition Rating	Remove from PBR	Target was achieved and accordingly, no significant improvement in performance is expected.

4. Finally, the descriptions for Indices and Measures have been revised to provide clarity.

5. The following revisions are proposed to the existing program for the 2025-2027 PBR term:

Reference:	3.1 Environment Index, 3.2 Customer Service Index, 3.3 System Reliability & Optimization Index and 3.4 Safety Index
Current:	The formulas for calculation of the “factors” (ratios of actual results compared to the standards) are presented for each Performance Measure in the sub-sections that describe each Performance Measure.
Proposed:	The formulas for calculation of the “factors” (ratios of actual results compared to the standards) are presented for all Performance Measures together within the sections that describe each Index.
Rationale:	The calculation of the “factors” (ratios of actual results compared to the standards) for each Performance Measure is required to determine the points for each Index and is not part of the Performance Measure calculation itself. For this reason, separation of each calculation of each Performance Measure result from the “factors” used to assess the points was done for clarity.

Reference:	3.1.1 - 3.1.3 - Environment Index Measures, 3.2.1 - 3.2.4 - Customer Service Index Measures, 3.3-1 - 3.3.4 - System Reliability & Optimization Index Measures, and 3.4.1 - 3.4.4 - Safety Index Measures
Current:	Calculation of measure results are combined with assessment of measure results relative to measure benchmarks.
Proposed:	Only the results for a measure are calculated. Additional information for assessment of the result is provided which includes the performance standard (previously referred to as a benchmark) as well as the significance of the standard (minimum or maximum) but the assessment is not calculated here.
Rationale:	For each measure, only the result is calculated which is then used for assessment in the Index section. The performance standard defines what is expected. Change of the term ‘benchmark’ to the term ‘performance standard’ was made as benchmark implies aspirational performance which can result in increased costs and diversion of resources with no cost-effective gains. The

	standard is the expectation for performance.
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Reference:	3.1.1 Stormwater Flow Monitoring Performance Measure - Environmental Index
Current:	Stormwater Flow Monitoring – current standard is 63.0% (minimum, annually)
Proposed:	Stormwater Flow Monitoring – increase standard to 70.0% (minimum, annually)
Rationale:	EWS is proposing to increase the performance standard to 70.0% (minimum) which is just above the 5-year average of 66.7%.

Reference:	3.1.2 Reportable Environmental Incidents Performance Measure - Environmental Index
Current:	3.1.2 Environmental Incident Management – current standard is 50 (maximum, annually)
Proposed:	3.1.2 Reportable Environmental Incidents Performance Measure – revise the standard to 30 (maximum, annually)
Rationale:	<p>EWS is proposing to change the name to reflect that only reportable environmental incidents are included. This is not a change in reporting but rather an alignment of the name with the measure.</p> <p>The change in the standard from 50 to 30 (maximum) reflects an increase in performance and is set at approximately 50% above the 4-year average (20 incidents). The proposed change reflects that the number of incidents are highly dependent upon operational parameters and procedures, complexity of the operation, regulatory approval requirements and other factors.</p>

Reference:	New Measure - 3.1.3 Stormwater Rebates Projects Performance Measure - Environmental Index
Current:	N/A
Proposed:	Stormwater Rebates Projects Performance Measure - 150 rebates (minimum, annually) Rebates issued to customers to reduce runoff entering the wastewater

	collection system during storm events
Rationale:	The Stormwater Rebates Projects is a measure of EWS’s success to meet the objectives of the “Slow” theme from the Stormwater Integrated Resource Plan (SIRP) through customer level participation. This will take the form of a coordinated rebate program for customers to complete on-site stormwater management activities to reduce the runoff entering the collection system during storm events. The proposed standard is set at 150 rebates per year (minimum).

Reference:	New Measure - 3.2.1 Stormwater Facility Response Time Performance Measure - Customer Service Index
Current:	N/A
Proposed:	Stormwater Facility Response Time Performance Measure – 96.0% (minimum, annually) Stormwater Facility Response Time is a measure of the time it takes for an EWS crew to attend a stormwater management facility when a third party contacts the EWS dispatch office to report a concern.
Rationale:	This is a direct measure of customer service. The Stormwater Facility Response Time Result is the percentage of stormwater facility trouble calls investigated within four business days. The proposed standard is set at 96.0% (minimum) based on limited historical data.

Reference:	New Measure - 3.2.2 Deficient Appurtenances Response Time Performance Measure - Customer Service Index
Current:	N/A
Proposed:	Deficient Appurtenances Response Time – 95.0% (minimum, annually) This is a direct measure of customer service. Deficient Appurtenances Response Time is a measure of the time it takes for an EWS crew to attend a location when a third-party contact the EWS dispatch office to report a concern with a deficient appurtenance that forms part of the sewer system.
Rationale:	The Deficient Appurtenances Response Time Result is the percentage of deficient appurtenance sewer trouble calls investigated within 24 hours. The standard is set at 95.0% (minimum) based on limited historical data.

Reference:	New - 3.2.3 Sewer Odour Response Time Performance Measure - Customer Service Index
Current:	N/A
Proposed:	Sewer Odour Response Time Performance Measure – 95.0% (minimum, annually) This is a direct measure of Customer service. Sewer Odour Response Time is a measure of the time it takes for an EWS crew to attend a location when a third party contacts the EWS dispatch office to report a concern with an odour they attribute to the sewer system.
Rationale:	The Sewer Odour Response Time result is the percentage of sewer odour trouble calls investigated within eight hours. The standard is set at 95.0% (minimum) based on limited historical data. and process changes being made to ensure improved responsiveness

Reference:	3.2.4 Service Connections Average Time Performance Measure - Customer Service Index
Current:	Service Connections – current standard is 85.0% (minimum, annually)
Proposed:	Service Connections – maintain standard at 85.0% (minimum, annually)
Rationale:	EWS proposes to maintain the standard at 85.0% (minimum) which is just below the 10-year average.

Reference:	3.3.1 Service Maintenance Calls Performance Measure - System Reliability & Optimization Index
Current:	3.2.1 Service Maintenance Calls – current standard is 80.0% (minimum, annually)
Proposed:	3.3.1 Service Maintenance Calls – new standard increased to 90.0% (minimum, annually)
Rationale:	EWS proposes to increase the standard to 90.0% (minimum), based on limited history.

Reference:	3.3.2 Emergency Dig Ups – Service Restored - System Reliability & Optimization Index
Current:	3.2.2 Emergency Dig-Ups Service Restored – current standard is 98.0% (minimum, annually)

Proposed:	3.3.2 Emergency Dig Ups – Service Restored – maintain current standard at 98.0%
Rationale:	EWS proposes to maintain the standard at 98.0% (minimum, annually) which is just below the 10-year average.

Reference:	3.3.3 Sewer Odour Hotspots - System Reliability & Optimization Index
Current:	3.2.4 Sewer Odour Hotspots – current standard is <14.0% for 2024.
Proposed:	3.3.3 Sewer Odour Hotspots – new standard changed to 10.0% (maximum)
Rationale:	EWS proposes to revise the standard to 10.0% (maximum) which is at the 10-year history.

Reference:	3.3.4 Full Property Flood Proofing Inspections - System Reliability & Optimization Index
Current:	3.3.4 Full Property Flood Proofing Inspections – 750 inspections (minimum, annually)
Proposed:	3.3.4 Full Property Flood Proofing Inspections –1,000 inspections (minimum, annually)
Rationale:	EWS proposes to increase the standard to 1,000 inspections (minimum, annually). Higher performance was achieved in 2023. However, there are limitations due to resources being redirected to work in higher priority areas such as stormwater ponds and monitoring and addressing odour concerns as well as limited customer involvement.

Reference:	3.4.1 Near Miss & Hazard Identification Performance Measure - Safety Index
Current:	3.4.1 Near Miss Reporting Factor – current standard 750 reports (minimum, annually) for Wastewater Collection Services only.
Proposed:	3.4.1 Near Miss & Hazard Identification (name changed) and full EWS involvement (i.e., not limited to Wastewater Collection Services only) – revised standard 2,600 reports (minimum, annually)
Rationale:	EWS proposes to change the name to Near Miss & Hazard Identification to reflect inclusion of both types of events. EWS underwent a reorganization on July 1, 2023 during which Water Treatment, Wastewater Treatment and Wastewater Collection Services

	<p>were combined into a single entity. Therefore, for the 2025-2027 PBR term, EWS is proposing to have common safety measures across Wastewater Treatment and Wastewater Collection Services in order to drive consistency in approach and comparability of results.</p> <p>EWS proposes to change the standard from only Wastewater Collection Services to all of EWS. The annual standard of 2,600 (minimum) was chosen which reflects the 5-year history for EWS.</p>
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Reference:	3.4.2 Work Site Inspections & Observations Reporting Performance Measure - Safety Index
Current:	3.4.2 Work Site Inspections & Observations Factor –1,300 (minimum, annually for Wastewater Collections only)
Proposed:	3.4.2 Worksite Inspections & Observations Reporting Performance Measure – (minimum, annually for all of EWS).
Rationale:	<p>EWS underwent a reorganization on July 1, 2023 during which Water Treatment, Wastewater Treatment and Wastewater Collection Services were combined into a single entity. Therefore, for the 2025-2027 PBR term, EWS proposes common safety measures across Wastewater Treatment and Wastewater Collection Services to drive consistency in approach and comparability of results.</p> <p>EWS proposes to change the standard from only Wastewater Collection Services to all EWS. The annual standard of 6,000 (minimum) was chosen which reflects the 5-year history for EWS.</p>

Reference:	3.4.3 All Injury Frequency Rate Performance Measure – Safety Index
Current:	3.4.4 All injury Frequency Rate Factor – standard 0.75 (maximum, annually for Wastewater Collection Services only)
Proposed:	3.4.3 All Injury Frequency Rate Performance Measure – standard 1.15 (maximum, annually for all of EWS)
Rationale:	<p>EWS underwent a reorganization on July 1, 2023 during which Water Treatment, Wastewater Treatment and Wastewater Collection Services were combined into a single entity. Therefore, for the 2025-2027 PBR term, EWS is proposing to have common safety measures across Wastewater</p>

	<p>Treatment and Wastewater Collection Services to drive consistency in approach and comparability of results.</p> <p>Standard was changed from only Wastewater Collection Services to all EWS. The annual standard of 1.15 (maximum) was chosen which is below the 5-year history for Wastewater Collection but at the internal standard set for all of EWS.</p>
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2.2.3.3 Wastewater Treatment Service Quality

6. The following tables provide a summary of proposed revisions to the Wastewater System Service Quality performance indices in Section 4.0 of Schedule 3, including updates and the rationale for changes, as appropriate. The current performance measures for Wastewater Treatment Services were introduced in January of 2012. EWS is proposing to replace one performance measure – Biosolids Inventory Reduction to Biosolids Management. Finally, the descriptions for Indices and Measures have been revised to provide clarity.

7. The following revisions are proposed to the existing program for the 2025-2027 PBR term:

Reference:	4.1 Wastewater Quality & Environment Index, 4.2 Customer Service Index, 4.3 System Reliability & Optimization Index, and 4.4 Safety Index
Current:	The formulas for calculation of the “factors” (ratios of actual results compared to the standards) are presented for each Performance Measure in the sub-sections that describe each Performance Measure.
Proposed:	The formulas for calculation of the “factors” (ratios of actual results compared to the standards) are presented for all Performance Measures together within the sections that describe each Index.
Rationale:	The calculation of the “factors” (ratios of actual results compared to the standards) for each Performance Measure is required to determine the points for each Index and is not part of the Performance Measure calculation itself. For this reason, separation of each the calculation of each Performance Measure result from the “factors” used to assess the points was done for clarity.

Reference:	4.1.1 - 4.1.2 - Wastewater Quality & Environment Index Measures, 4.2.1 - 4.2.3 - Customer Service Index Measures, 4.3-1 - 4.3.3 - System Reliability & Optimization Index Measures, and 4.4.1 - 4.4.4 - Safety Index Measures
Current:	Calculation of measure results are combined with assessment of measure results relative to measure benchmarks.
Proposed:	Only the results for a measure are calculated. Additional information for assessment of the result is provided which includes the performance standard (previously referred to as a benchmark) as well as the significance of the standard (minimum or maximum) but the assessment is not calculated here.
Rationale:	For each measure, only the result is calculated which is then used for assessment in the Index section. The performance standard defines what is expected. Change of the term 'benchmark' to the term 'performance standard' was made as benchmark implies aspirational performance which can result in increased costs diversion of resources with no cost-effective gains. The standard is the expectation for performance.

Reference:	4.1.1 Wastewater Effluent Limit Performance Measure – Wastewater Quality Wastewater Quality & Environmental Incidents Index
Current:	4.1.1 WELPI Factor - <= 26.0 YTD
Proposed:	4.1.1 Wastewater Effluent Limit Performance Measure – 26.0% (maximum, annually)
Rationale:	EWS proposes to change the name to Wastewater Effluent Limit Performance (WELP) as well as adding exception events. WELP more clearly aligns with the measure which intended to demonstrate the overall effectiveness of the wastewater treatment processes. The Standard will remain at 26.0% (maximum) which is above the 10-year average. Exception events have been added which may be considered during specified process shutdown events which may impact WELP but would not violate the Approval to Operate. Exception events identified include: (i) capital work on

	secondary treatment trains of the UV disinfection system; (ii) completion of corrective actions to address process upsets; or (iii) accommodation of regulatory agency requests.
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Reference:	4.1.2 Environment Incidents Performance Measure – Environmental Index
Current:	4.1.2 – Environmental Incident Factor – <=5 YTD
Proposed:	4.1.2 – Environmental Incidents Performance Measure – 5 (maximum, annually)
Rationale:	EWS is proposing to maintain the standard at 5 (maximum, annually) which is the 10-year average.

Reference:	4.2.1 H ₂ S – 1 Hour Exceedance Performance Measure – Customer Service Index
Current:	4.2.1 H ₂ S – 1 Hour Exceedance Factor - <=4 YTD
Proposed:	4.2.1 H ₂ S – 1 Hour Exceedance Performance Measure – 4.0 (maximum, annually)
Rationale:	EWS is proposing to maintain the Standard at 4.0 (maximum) which is consistent with the 10-year average.

Reference:	4.2.2 H ₂ S – 24 Hour Exceedance Performance Measure – Customer Service Index
Current:	4.2.2 H ₂ S – 24 Hour Exceedance Factor <=1.0 YTD
Proposed:	4.2.2 H ₂ S - 24 Hour Exceedance Performance Measure - 1.0 (maximum, annually)
Rationale:	EWS is proposing to maintain the standard at 1.0 (maximum, annually) which is consistent with the 10-year average.

Reference:	4.2.3 Scrubber Uptime Performance Measure – Customer Service Index
Current:	4.2.3 Scrubber Uptime Factor – 96.0% (maximum, annually)
Proposed:	4.2.3 Scrubber Uptime Performance Measure – 96.0% (maximum, annually)

Rationale:	EWS is proposing maintain the standard at 96.0% (minimum, annually) which is just below the 7-year average of 97.0%. Two additional scrubbers will be added to system in 2024 which will provide some redundancy and allow for operational flexibility but will not increase uptime.
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Reference:	4.3.1 Enhanced Primary Treatment Performance Measure – System Reliability & Optimization Index
Current:	4.3.1 Enhanced Primary Treatment Factor – 94.0% (maximum, annually)
Proposed:	4.3.1 Enhanced Primary Treatment Factor – 97.0% (maximum, annually)
Rationale:	<p>EWS proposes increasing the Enhanced Primary Treatment Standard to 97.0% as well as adding exception events.</p> <p>The increase in the standard to 97.0% (minimum) reflects an increase in performance and is based on the 10-year average of historic performance. Exception events have been added which may be considered during specified process shutdown events which might impact Enhanced Primary Treatment performance but would not violate the Approval to Operate. Exception events identified include: 1) capital work on alum or polymer systems, clarifiers, or sludge/scum collection systems; 2) completion of corrective actions to address process upsets; or 3) accommodation of regulatory agency requests.</p>

Reference:	New Measure - 4.3.2 Biosolids Inventory Reduction – System Reliability & Optimization Index
Current:	N/A
Proposed:	4.3.2 Biosolids Management Performance Measure – 25,000 dry tonnes (minimum, annually)
Rationale:	Biosolids Management is a measure of EWS's utilization of biosolids from the wastewater treatment process and is calculated based on the total dry tonnes of biosolids transferred from the biosolids storage basins at the Clover Bar Biosolids Resource Recovery Facility to beneficial use programs such as compost or land application. The proposed standard is set at 25,000

	dry tonnes (minimum).
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Reference:	4.3.3 Energy Efficiency Performance Measure – System Reliability & Optimization Index
Current:	4.3.3 Energy Efficiency Factor – 508 (maximum, annually)
Proposed:	4.3.3 Energy Efficiency Performance Measure – 508 (maximum, annually)
Rationale:	EWS is proposing to maintain the standard at 508.0 which reflects performance at the historic average of the past 10 years.

Reference:	4.4.1 Near Miss & Hazard Identification Reporting Measure - Safety Index
Current:	4.4.1 Near Miss Reporting Factor – 220 reports (minimum, annually for only Wastewater Treatment Services)
Proposed:	4.4.1 Near Miss & Hazard Identification (name changed) and full EWS involvement (i.e., not limited to Wastewater Collection Services only) – revised standard 2,600 reports (minimum, annually)
Rationale:	<p>EWS has proposed to change the name to reflect inclusion of both Near Misses and Hazard Identification events.</p> <p>EWS underwent a reorganization on July 1, 2023 during which Water Treatment, Wastewater Treatment and Wastewater Collection Services were combined into a single entity. Therefore, for the 2025-2027 PBR term, EWS is proposing to have common safety measures across Wastewater Treatment and Wastewater Collection Services in order to drive consistency in approach and comparability of results.</p> <p>The proposed standard was changed from only Wastewater Treatment Services to all EWS. The annual standard of 2,600 (minimum) was chosen which reflects the 5-year history for EWS.</p>

Reference:	4.4.2 Worksite Inspections & Observations Performance Measure - Safety Index
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Current:	4.4.2 Worksite Inspections and Observations Factor – 919 (minimum, annually for only Wastewater Treatment Services)
Proposed:	4.4.2 Worksite Inspections & Observations Performance Measure – 6,000 (minimum, annually for all of EWS)
Rationale:	<p>EWS underwent a reorganization on July 1, 2023 during which Water Treatment, Wastewater Treatment and Wastewater Collection Services were combined into a single entity. Therefore, for the 2025-2027 PBR term, EWS proposes common safety measures across Wastewater Treatment and Wastewater Collection Services to drive consistency in approach and comparability of results.</p> <p>The proposed standard was changed from only Wastewater Treatment Services to all EWS. The annual standard of 6,000 (minimum) was chosen which reflects the 5-year history for EWS.</p>

Reference:	4.4.3 All Injury Frequency Rate Performance Measure - Safety Index
Current:	4.4.3 Lost Time Injury Frequency Factor – 0.75 (maximum, annually for only Wastewater Treatment)
Proposed:	4.4.3 All Injury Frequency Rate Performance Measure – 1.15 (maximum, annually for all EWS)
Rationale:	<p>EWS underwent a reorganization on July 1, 2023 during which Water Treatment, Wastewater Treatment and Wastewater Collection Services were combined into a single entity. Therefore, for the 2025-2027 PBR term, EWS is proposing to have common safety measures across Wastewater Treatment and Wastewater Collection Services in order to drive consistency in approach and comparability of results.</p> <p>The standard was changed from only Wastewater Treatment Services to all EWS. The proposed annual standard of 1.15 (maximum) was chosen which is above the 10-year history for Wastewater Treatment Services, but at the internal standard set for all of EWS.</p>