

Appendix E

EPCOR WATER SERVICES

Final 2020-2022 PBR Progress Reports

May 31, 2024

2020 PBR Progress Report



2017 – 2021 Performance Based Regulation
Water Services,
Wastewater Treatment Services,
and Drainage Services

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1 Executive Summary

This report provides an annual update to the City of Edmonton on the operational and financial results for the year ended December 31, 2020 for water services ("In-City Water"), wastewater treatment services ("Wastewater"), and sanitary and stormwater sewer services ("Drainage") provided within Edmonton by EPCOR Water Services Inc. ("EWSI"). The City of Edmonton City Council regulates In-City Water and Wastewater in accordance with the Performance Based Regulation ("PBR") Plan approved in the EPCOR Water Services and Wastewater Treatment Bylaw No. 17698 ("Bylaw 17698") and Drainage in accordance with the PBR Plan approved in EPCOR Drainage Services Bylaw No. 18100 ("Bylaw 18100").

1.1 Financial Performance

In-City Water, Wastewater and Drainage's financial performance for 2020 are summarized in Table 1.1 below¹:

Table 1.1
Revenue and Return on Equity
(\$ millions)

		Α	В	С	D
		20:	20	2017-2020*	
	Revenue and Return on Equity	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	In-City Water				
2	Revenue	214.2	203.4	808.1	774.6
3	Return on Equity	42.6	42.9	159.7	153.1
4	Rate of Return on Equity	10.18%	10.09%	10.18%	9.74%
5	Wastewater				
6	Revenue	112.6	105.4	410.1	391.4
7	Return on Equity	20.6	20.1	73.6	78.6
8	Rate of Return on Equity	10.18%	10.70%	10.18%	11.52%
9	Drainage				
10	Revenue	208.5	214.4	607.5	608.0
11	Return on Equity	19.1	30.3	76.7	90.0
12	Rate of Return on Equity	3.25%	4.96%	4.46%	5.03%

^{*2018-2020} for Drainage.

In 2020, In-City Water and Wastewater's revenues were significantly lower than forecast due to both low inflation, which affected rates adjustments and declines in commercial consumption as a result of the COVID-19 pandemic. Drainage revenues, which reflect scheduled rates from Bylaw 18100, were greater than forecast, with revenues from non-routine adjustments for SIRP and CORe more than offsetting declines in Sanitary Utility variable charge revenues.

¹ Consistent with the 2017-2021 PBR Application, all financial data in this report, including totals and sub-totals, are rounded to the nearest \$0.1 million. This practice ensures continuity of data between tables and between years. However, the sum of the rounded detailed data in certain tables may not be equal to the related rounded total or sub-total.

In 2020, In-City Water achieved a 10.09% rate of return on equity (9.74% for 2017-2020), compared to its forecast rate of return of 10.175%. Operating expense reductions achieved by In-City Water (\$10.1 million) were unable to fully offset reductions in revenue. The In-City Water mid-year rate base is \$15.7 million (1.50%) higher than forecast, higher than forecast mid-year rate base also contributes to the lower rate of return on equity achieved in 2020.

In 2020, Wastewater achieved a 10.70% rate of return on equity (11.52% for 2017-2020), compared to its forecast rate of return of 10.175%. Lower than forecast operating expenses, combined with a lower than forecast rate base, more than offset reductions in revenue.

In 2020, Drainage achieved a 4.76% rate of return on equity (5.03% for 2018-2020), compared to its forecast rate of return of 3.25% (4.46% for 2018-2020). Lower than forecast operating expenses, lower interest expense due to one-time preferential financing from EUI and a lower than forecast rate base, more than offset reductions in revenue. As discussed in prior years' PBR Progress Reports, Drainage does not have a City of Edmonton-approved PBR forecast. Therefore, over the 2018-2021 period, Drainage's actual financial performance is compared to its 2018 EWSI budget, escalated at an appropriate inflation rate and adjusted for: (i) removal of one-time costs related to the transition of Drainage to EPCOR; and (ii) differences in basis of accounting between International Financial Reporting Standards (IFRS) and regulatory accounting.

Detailed analyses of In-City Water, Wastewater and Drainage's financial performance for 2020 and for the 2017-2020 period are provided in sections 2.3, 3.3, and 4.3, respectively.

1.2 Capital Expenditures

In-City Water, Wastewater and Drainage's capital expenditures for 2020 and updated forecasts the five-year term of the PBR Plan (the "2017-2021 PBR term") are summarized in Table 1.2 below:

Table 1.2
Capital Expenditures
(\$ millions)

		Α	В	С	D	Е	F
		2020		2017-2020 ⁽¹⁾		2017-2021	
	Capital Expenditures	PBR Forecast	Actual	PBR Forecast	Actual	PBR Forecast	Current Projection
1	In-City Water	108.5	125.8	411.2	433.3	515.3	576.6
2	Wastewater	47.7	39.2	213.3	187.7	235.4	248.3
3	Drainage	215.5	236.1	527.5	481.9	780.6	747.5

⁽¹⁾ Drainage Forecast and Actual results only include 2018-2020, 2018 is the first full year of Drainage operation following the transfer to EPCOR in September 2017.

Over the course of the PBR term, changes to capital programs are required to address unforeseen needs for repairs or rehabilitation, changes in regulatory or operational requirements, customer demands, and other external factors. These changes are coordinated through EWSI's Project Management Office and are authorized by EWSI's Capital Project Steering Committee, EPCOR Utility Inc.'s (EUI) Financial

⁽²⁾ Amounts include capital expenditures approved through Non-Routine adjustments.

Review Council, or EPCOR's Board of Directors, depending on the amount of the expenditure. EWSI also presents information on its capital programs, as well as business cases supporting significant new capital projects (i.e. not already included in the approved PBR application), to the Utility Committee throughout the year. The 2017-2021 forecasts presented above represents the most recent forecasts and do not reconcile entirely with that forecasts contained in the PBR applications as they were completed at an earlier point in time.

- In-City Water's 2017-2021 projected capital expenditures of \$576.6 million are \$61.4 million (11.9%) greater than the PBR forecast. Significant projects contributing to this variance include the E.L. Smith Solar Farm Project and Battery Storage System (\$26.0 million), which is funded through the Special Rate Adjustment for Environmental Initiatives; changes to the scope of the Water D&T Facility Expansion Project, which adds an additional \$6.5 million to its cost; and an increase in developer driven projects such as the Network PD Transmission Mains Program, Water Main Cost Sharing Program, and Water Service Connection Program (\$25.5 million).
- Wastewater's 2017-2021 projected capital expenditures of \$248.3 million are \$12.9 million (5.5%) greater than the PBR forecast. The Gold Bar Wastewater Treatment Plant's aging infrastructure poses challenges to capital planning. Since the plant cannot be shutdown for maintenance, it is often difficult to accurately assess asset condition and the scope of rehabilitation needed before commencing work on a project. During preliminary engineering in 2017 and 2018, EWSI identified significant needs for repairs to critical infrastructure, such as sludge lines replacements, clarifier chain replacements, and structural rehab that had not been anticipated in the PBR forecast. EWSI reviewed design options and employed value engineering to reprioritize reliability and life cycle replacements. These efforts have ensured that changes to projections of the total cost of the 2017-2021 capital expenditures program have resulted in only a slight increase from the PBR forecast.
- **Drainage's** 2018-2021 projected capital expenditures of \$747.5 million are \$33.1 million (4.4%) less than capital expenditures included in the City Long Term Plan and approved Non-Routine Adjustments. This decrease reflects substantial shifts of projected costs between programs as Drainage continues to refine and reprioritize its overall capital expenditures program to address asset condition, mitigate the risk of failure, and maintain required service levels. These decreases are partially offset by higher capital expenditures on the Non-Routine Adjustment for CORe and \$32.8 million in additional capital expenditure for a real estate consolidation initiative (a combined water and drainage facility also referenced in water's capital expenditure section above).

Detailed explanations for differences between capital expenditures in PBR forecast and EWSI's current projections are provided in Sections 2.4, 3.4 and 4.4.

1.3 Operational Performance

In-City Water's and Wastewater's operational performance is measured by the results of indices prescribed in Schedule 3 of Bylaw 17698 with each index consisting of one or more performance measures. Commencing in 2020, Drainage's operational performance is measured using PBR performance indices approved by City Council on February 19, 2020 as amendments to Bylaw 18100.

Drainage's new PBR metrics program is patterned after the Water and Wastewater PBR metrics and meets the requirements of the Letter of Intent developed for the transition of Drainage Services from the City to EPCOR

Operational performance under each index is measured independently on a point basis with 100 base points available if the standards for all performance measure indices are achieved. Bonus points are available for performance above standards and financial penalties are applied if EWSI does not meet the 100 base point standard.

In 2020, In-City Water exceeded the performance standards for all five of its performance measure indices, Wastewater exceeded the performance standards for all four of its performance measure indices, and Drainage exceeded the performance standards for three of its four performance measure indices. Detailed discussions of the performance measures making up each of the indices and operational performance highlights are provided in Section 2.5 for In-City Water, Section 3.5 for Wastewater, and Section 4.5 for Drainage.

Table 1.3-1
2020 Performance Measures and Standards

		Α	В	С	D	Е	F
		In-City	Water	Waste	Wastewater		age
Performance Index		Standar	Actual	Standar	Actual	Standar	Actual
			Score	d	Score	d	Score
1	Water Quality Index ⁽¹⁾	25.0	25.0	55.0	60.5	N/A	N/A
2	Customer Service Index	20.0	21.5	15.0	16.5	20.0	21.4
3	System Reliability and Optimization	25.0	28.5	15.0	16.5	35.0	33.5
	Index						
4	Environmental Index ⁽¹⁾	15.0	16.5	N/A	N/A	30.0	33.0
5	Safety Index	15.0	16.5	15.0	16.5	15.0	16.5
6	Aggregate Points Earned	100.0	108.0	100.0	110.0	100.0	104.4

¹Water Quality and Environmental are combined into one index for Wastewater's and Drainage's operational performance

1.4 Rates and Bill Comparisons

In 2020, the average monthly bill for In-City Water customers, based on 2020 average monthly consumption per residential customer of 14.7 m³, was **\$39.90**, an increase of 5.5% from 2019. This increase consists of the 1.7% inflation adjustment discussed in Section 2.3.1; Special Rate Adjustments for Environmental Initiatives (0.3%), Accelerated Programs (0.5%) and Rebasing (0.7%); and Non-Routine Adjustment approved in 2019 for the Lead Mitigation Strategy (1.1%), Leduc County Annexation (0.7%), and LRT related Water Infrastructure Relocations (0.4%).

The average residential customer's wastewater treatment bill in 2020, also based on monthly consumption of 14.7 m³, was **\$19.30**, an increase of 6.1% from 2019. This increase includes the 1.7% inflation adjustment, and the Special Rate Adjustment for rebasing of 4.4% needed to support Wastewater's 2017-2021 capital programs.

The average residential customer's drainage bill in 2020, again based on monthly consumption of 14.7 m³, was \$37.95, an increase of 6.4% from 2019. This increase consists of the annual 3.0% increase set

in Bylaw 18100, and Non-Routine Adjustments approved in 2019 for the Corrosion and Odour Reduction Strategy (1.6%), the Stormwater Integrated Resource Plan (1.5%), and LRT related Drainage Infrastructure Relocations (0.4%).

EWSI undertakes annual bill comparison surveys with various cities and local communities. Section 2.6 shows that EWSI's residential water rates are competitive with most of the cities and communities included in the comparison, with only Vancouver having significantly lower water rates. Drainage and Wastewater bills are more difficult to compare because of variations in the nature and extent of wastewater treatment, the inclusion of certain services in property taxes, and geographic and climatic factors which influence the level of investment in and approach to flood mitigation. Section 3.6 shows that Edmonton's combined Drainage and Wastewater Treatment bills are competitive with those of other cities and communities with similar geographic and climatic conditions. Commercial bill comparisons for both water and wastewater show similar results to residential water and wastewater bills.

1.5 Non-Routine Adjustments

Non-Routine Adjustments for In-City Water and Wastewater are defined in Bylaw 17698, and for Drainage in Bylaw 18100, as "items which are unusual, significant in size or nature, and beyond the scope of control of EWSI". Bylaws 17698 and 18100 allow EWSI to request adjustments to In-City Water, Wastewater and Drainage rates for Non-Routine Adjustments from the City Manager or City Council, depending on financial impact.

In 2019, EWSI received approval to increase In-City Water and Drainage rates for the following projects that qualified as Non-Routine Adjustments outlined in Bylaw 17698, Schedule 3, Section 5.0 for Water and Wastewater, or in Bylaw 18100, Schedule 3 Section 4.1 for Drainage. These non-routine adjustments were included in Drainage rates commencing January 1, 2020, January 1, 2021, and January 1, 2022, and In-City Water rates commencing April 1, 2020 and will be escalating by inflation less the productivity factor in April 1, 2021.

- Lead Mitigation Strategy (In-City Water) On March 22, 2019, EWSI presented a new lead mitigation strategy to the Utility Committee. This strategy is designed to meet new Health Canada Guidelines that reduce the maximum concentration of lead in drinking water at the tap from 10 parts per billion to 5 parts per billion. On July 16, 2019, EWSI received approval to apply the Non-Routine Adjustments to In-City water rates commencing April 1, 2020 to recover the costs of implementing this strategy. The additional cost to an average residential In-City Water customer was \$0.40 per month commencing April 1, 2020 (or a total of \$10.91 over the 2017-2021 PBR term).
- Leduc County Annexation (In-City Water) On November 27 2018, the Government of Alberta approved the City of Edmonton's annexation of 8,260 hectares from Leduc County. As part of the annexation, EWSI will acquire the existing water infrastructure within or required to service the annexed area, including a reservoir, pump house and booster station, as well as transmission mains and a small distribution system, at a cost of \$9.5 million which is comprised of \$7.8 million for the Discovery Park reservoir and the remainder for a pipeline and booster station. On November 7, 2019, EWSI received approval to apply the Non-Routine Adjustments to In-City Water rates commencing April 1, 2020 to recover the costs related to the annexation. The additional cost to the average

residential In-City Water customer was \$0.26 per month commencing April 1, 2020 (or a total of \$7.09 over the 2017-2021 PBR term).

- LRT Relocations (In-City Water and Drainage) EWSI has identified work needed to accommodate water main, hydrant and sewer relocations for the West Valley Line and Metro Line Northwest Phase I LRT projects. On November 7, 2019, (Drainage) and December 23, 2019 (In-City Water) EWSI received approvals to apply the Non-Routine Adjustments to water rates for In-City Water customers commencing April 1, 2020 and to Sanitary Utility and Storm Water Utility rates for Drainage customers commencing January 1, 2020. The additional cost to the average residential In-City Water customer is \$0.17 per month commencing April 1, 2020 (\$4.64 over the 2017-2021 PBR term). The average monthly bill increase for residential Drainage customers is \$0.14 per month commencing January 1, 2020, an additional \$0.37 per month commencing in January 1, 2021, and an additional \$0.31 per month commencing on January 1, 2022 (or a total of \$10.26 over the 2018-2021 PBR term).
- Stormwater Integrated Resource Plan (Drainage) On May 10, 2019, EWSI presented its Stormwater Integrated Resource Plan (SIRP) alternatives to the Utility Committee. The plan includes a mix of capital and operational program investments to mitigate flood risks across the City using a mix of grey and green infrastructure components installed within the public right-of-way or within City or EPCOR owned parcels. The SIRP approach allows for a lower overall capital investment than seen with traditional engineering approaches through the inclusion of operational programs that support the overall community in responding to flooding events. On December 2, 2019, EWSI received approval to apply the Non-Routine Adjustments to Storm Water Utility rates commencing January 1, 2020. The additional cost to the average residential Drainage customer is \$0.51 per month commencing January 1, 2020, an additional \$0.15 per month commencing January 1, 2021, and an additional \$0.03 commencing January 1, 2022 (or a total of \$16.11 over the 2018-2021 PBR term).
- Corrosion and Odour Reduction Strategy (Drainage) On June 28 2019, EWSI presented its Corrosion and Odour Reduction Strategy to the Utility Committee. The Corrosion and Odour Reduction Strategy was developed using similar principles and approaches to EWSI's SIRP to determine an optimized mix of operational and capital solutions to reduce corrosion and odour. The strategy expands the previous plan by focusing on preventing the formation of hydrogen sulphide gas, which will reduce community odour impacts and lengthen the life of sewer network assets. Areas of focus within the strategy include: prevent the formation of hydrogen sulphide gas in the sewer system, control the release of air from the sewer system, and adapt the system using real-time monitoring technologies and improved inspection data. On December 2, 2019, EWSI received approval to apply the Non-Routine Adjustments to Sanitary Utility rates commencing January 1, 2020. The additional cost to the average Residential Drainage customer is \$0.53 per month commencing January 1, 2020, an additional \$0.42 per month commencing January 1, 2021, and an additional \$0.06 per month commencing January 1, 2022 (or a total of \$20.79 over the 2018-2021 PBR term).

Table 1.5 summarizes the average residential customer monthly bill impact for all Non-Routine Adjustments that have been approved for EWSI's In-City Water and Drainage customers over the 2017-2021 PBR term. These Non-Routine Adjustments include the five Non-Routine Adjustments detailed above, plus the negative Non-Routine Adjustment approved in 2018, passing on reductions in corporate shared service cost

allocations resulting from the transfer of Drainage Services assets to EPCOR to In-City Water and Wastewater customers. These Non-Routine Adjustments expire on March 31, 2022 at the end of the current PBR term.

Table 1.5

Monthly Residential Bill Impacts

Water and Drainage Approved Non-Routine Adjustments
(2017-2021 PBR Term)
(\$/month)

		Α	В	С
Non-Routine Adjustment		2020	2021	2022* (Jan to Mar)
1	Corporate Cost Reduction (Drainage Transfer)	(1.04)	(1.05)	(1.05)
2	Lead Mitigation Strategy	0.40	0.41	0.41
3	Leduc County Annexation	0.26	0.26	0.26
4	LRT Relocations	0.31	0.68	0.99
5	Corrosion and Odour Reduction Strategy	0.53	0.95	1.01
6	Stormwater Integrated Resource Plan	0.51	0.66	0.69
7	Total Monthly Bill Impact	0.97	1.91	2.31

^{*} EWSI's current bylaws expire on March 31, 2022. New bylaws with updated rates would be in effect for the remainder of 2022.

2 In-City Water Services

2.1 Accomplishments and Challenges

In 2020, In-City water had significant accomplishments, including:

- Completion of Water's long term Integrated Resource Plan (IRP). The IRP encompasses: customer growth; changes to provincial regulatory frameworks; technology; asset management; and health, safety and environmental considerations. The IRP provides a roadmap for enabling EWSI's Water Treatment Plants and Distribution and Transmission operations to meet Edmonton's and surrounding community's future growth demands, while continuing to deliver safe and reliable drinking water;
- On August 27, 2020, EWSI received Decision 25770-D01-2020 from the AUC which will allow EWSI
 to construct and operate a 4MW battery energy storage system to increase the operational
 performance of the E.L. Smith Solar Farm by balancing supply and demand of electricity and serving
 as a backup power supply for the E.L. Smith Water Treatment Plant. This was followed by approval
 from Edmonton City Council for rezoning of the EPCOR-owned land for the Solar Farm project on
 October 19, 2020.
- Initial implementation of enhanced Lead Mitigation Program to reduce lead levels at the tap, including
 the addition of orthophosphate at the water treatment plants, as well as accelerated replacement of
 lead service lines (LSLs) from the water main to the meter inside the customer's home
- Execution of the Real Estate Consolidation Project. This project's overall objective is to leverage the natural operational synergies that exist between Water and Drainage to reduce the overall cost to customers through cost reduction and cost avoidance, while maintaining the service quality level that EWSI currently delivers, both during the transition to the single service center and in the long term. An important driver of cost minimization is synergies between Drainage Services and Water Services, some of which are only possible through consolidation. Cost reduction will be attainable by not having to fill vacancies created through attrition with consolidation. Cost avoidance anticipated with consolidation include improved and coordinated scheduling and planning of activities to reduce multiple trips to execute work. Additional operational benefits to be achieved over time include improved communications between engineering and field construction with staff being located in the same service centre.
- Between 2017 and 2020, EWSI completed a number of notable capital projects at both the water treatment plants and in the distribution and transmission system which have benefited EWSI's customers through improvements in overall safety and reliability of the water supply, safety improvements for EWSI's employees, improved environmental performance and expansion of the system in response to growing customer demands and City of Edmonton requests. These projects include:

 Significant upgrades at the Rossdale water treatment plant designed to improve the overall condition and increasing operational reliability and redundancy. These included upgrades to clarifiers, stilling basins, filter underdrains and air scour systems within the plant.

- Completion of the E. L. Smith Bypass Main Upgrade Project planned for 2021 to address the serious consequences of a failure of the ring main at E. L. Smith.
- Upgrades of various E. L. Smith and Rossdale chemical systems on a prioritized basis, including sodium bisulphite, sodium hypochlorite, ammonia and fluoride systems.
- Structural, mechanical and electrical upgrades and replacements to end-of-life and deteriorated structural components at Kaskitayo Reservoir.
- Replacement of 70 km of water mains during 2017-2021 through its various water main replacement programs to ensure reliability of the system is maintained. As a result of continued water main replacements, EWSI saw the lowest level of water main breaks since 1960 over the 2017-2021 period.
- Implementation of the Critical Pipeline Inspection program, inspecting critical transmission mains
 to more efficiently target weak points in the transmission system and further increase the reliability
 of the system.
- Expansion of the water distribution and transmission system as a result of the significant growth
 of the city of Edmonton over 2017-2021. This included adding 172 km of water mains by the end
 of 2020. EWSI has also continued its work with the City to relocate several water mains to
 accommodate City of Edmonton construction projects such as LRT expansions.
- Completion of the transfer of regional transmission pipelines and booster stations, including the Discovery Park Reservoir and the Southwest Pipeline and Booster Station at the end of 2020. The transfer of the of the Parkland Pipeline and Booster Station is planned for the 3rd quarter of 2021.

2.2 Customers and Consumption

In-City Water provides services to three customer classes: residential; multi-residential; and commercial (see Appendix A). These classes are unchanged from the previous PBR term and are described in detail in Appendix A. Customer counts, total annual consumption and monthly consumption per customer are shown in Table 2.2 below:

Table 2.2
Customers, Consumption and Consumption per Customer

		Α	В	С	D
	Customers and Consumption		2020		-2020
				PBR	
		Forecast	Actual	Forecast	Actual
1	Customers				
2	Residential	271,195	272,538	263,704	266,550
3	Multi-Residential	3,883	3,779	3,814	3,769
4	Commercial	20,018	19,846	19,636	19,720
5	Total	295,096	296,163	287,154	290,039
6	Consumption per Customer (m³ per month)				
7	Residential	13.9	14.7	14.3	14.4
8	Multi-Residential	408.6	407.9	408.6	396.5
9	Commercial	118.7	89.9	121.1	108.1
10	Annual Consumption (ML)				
11	Residential	45,350.5	48,105.2	180,756.6	184,018.2
12	Multi-Residential	19,039.3	18,498.4	74,813.4	71,732.6
13	Commercial	28,524.5	21,407.1	114,127.1	102,304.9
14	Total	92,914.3	88,010.6	369,697.0	358,055.7

The factors contributing to actual to forecast differences for 2020 and for 2017-2020 differ by customer class, as explained below:

- **Residential.** Customer counts in 2020 are 0.5% greater than forecast, primarily because of higher than expected actual customer counts at the beginning of the 2017-2021 PBR term. In 2020, consumption per customer was 5.6% higher than forecast, primarily attributable to changes in consumption patterns as a result of the COVID-19 pandemic (more time spent at home). Over the 2017-2020 period actual consumption per customer is slightly higher then the PBR forecast, confirming the robust residential forecasting methodology developed for the 2017-2021 PBR forecast. The combined effect of these factors is that total residential consumption for 2020 is 5.6% higher than forecast (0.7% greater for 2017-2020).
- Multi-Residential. Customer counts are 2.7% less than forecasts, continuing trends seen in 2018 and 2019. Consumption per customer, although still less than forecast, strengthened significantly in 2020, largely due to the COVID-19 pandemic. Lower than forecast customer counts, combined with lower than forecast consumption per customer, meant that total multi-residential consumption was 2.8% less than forecast in 2020 (4.1% lower for 2017-2020).
- Commercial. The commercial class was significantly impacted by the COVID-19 pandemic in 2020. Total consumption in the commercial customer class was 25.0% lower than forecast (8.4% lower in 2019), while customer counts were 0.9% lower than forecast. Largely attributable to public health guidance and restrictions put in place throughout the pandemic (closed facilities, capacity/occupancy limits, travel restrictions, employees working from home, etc.) nearly all industries experienced a decrease in consumption in 2020. Over the 2017-2020 period total commercial consumption is 10.4% lower than forecast.

2.3 Financial Performance

In-City Water's net income is derived from the provision of water services within Edmonton's boundaries. Besides these services, EWSI provides water services to surrounding communities under bulk water supply agreements with regional water service commissions ("RWCG" or "Regional Customers"), and fire protection services to the City of Edmonton under a service agreement ("Fire Protection").

EWSI's water system is fully integrated, with services jointly provided to In-City Water, Regional Customers and Fire Protection. Therefore, in sections 2.3.1 to 2.3.7, operating costs, depreciation, rate base and capital expenditures are presented and analyzed on a total system basis. In-City Water's share of these expenses, as well as its returns on rate base, are calculated in accordance with a cost of service model developed jointly by EWSI, the regional water service commissions and the City of Edmonton, and are shown as separate line items on each applicable table. In-City Water's total revenue and revenue requirements are summarized in Table 2.3 below:

Table 2.3
In-City Water Revenue Requirements
(\$ millions)

		Α	В	С	D
		20	20	2017-	2020
	Summary of Revenue Requirements	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	In-City Water Rate Revenue ⁽¹⁾	209.1	198.7	788.1	753.2
2	In-City Water Revenue Requirement				
3	Operating expenses	110.4	100.3	425.1	395.8
4	Other revenue	(5.1)	(4.6)	(20.0)	(21.4)
5	Depreciation and amortization	29.6	30.8	110.7	112.1
6	Return on rate base financed by debt	30.4	29.4	114.7	113.5
7	Return on rate base financed by equity	42.6	42.9	159.7	153.1
8	In-City Water Revenue Requirement*	207.9	198.7	790.2	753.2
9	Return on Rate Base Financed by Equity	10.18%	10.09%	10.18%	9.74%

¹ In the PBR forecast, rebasing and other special rate adjustments have been smoothed over the PBR term. Therefore, although forecast revenue is equal to the revenue requirement over the 2017-2021 PBR term, in any year within the PBR term, forecast revenue may be greater or less than the revenue requirement.

2.3.1 Revenue

In-City Water's rate revenues include fixed monthly services charges which vary by meter size and consumption charges applied to each cubic meter of water consumed. Besides rate revenue, In-City Water revenues also include other revenue derived from temporary services, connection fees, water permits, late payment charges and other incidental services. Table 2.3.1-1 below provides a comparison of 2020 In-City Water revenues to the PBR forecast:

Table 2.3.1-1 In-City Water Revenue (\$ millions)

	•	Α	В	С	D
		202	20	2017-	2020
	In-City Water Revenue	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Fixed Monthly Service Charges				
2	Residential	25.5	24.4	95.1	88.9
3	Multi-Residential	1.6	1.5	5.9	5.5
4	Commercial	4.7	4.4	17.5	16.3
5	Fixed Monthly Service Charges	31.7	30.4	118.4	110.7
6	Consumption Charges				
7	Residential	104.5	107.0	395.6	390.7
8	Multi-Residential	33.0	31.4	123.4	116.7
9	Commercial	39.8	29.9	150.7	135.2
10	Consumption Charges	177.3	168.4	669.6	642.5
11	In-City Water Rate Revenue	209.1	198.7	788.1	753.2
12	Other Revenue	5.1	4.6	20.0	21.4
13	Total In-City Water Revenue	214.2	203.4	808.1	774.6

In-City rate revenues were \$10.3 million less than forecast in 2020, and \$34.8 million less than forecast over the 2017-2020 PBR period. This difference is attributable to the following factors:

• Lower than forecast inflation resulted in a \$5.4 million decrease in 2020 (\$16.4 million for 2017-2020). The PBR plan limits Water and Wastewater's annual routine rate adjustments to inflation less an efficiency factor (see Appendix A.1). As shown in Table 2.3.1-2, actual PBR inflation adjustments for 2020 and 2017-2020 are significantly less than forecast. The effect of lower than forecast inflation from 2016 to 2020 will continue to impact revenues throughout the remainder of the 2017-2021 PBR term.

Table 2.3.1-2
2020 PBR Inflation Adjustment

		Α	В	С	D	
DDD Inflation Adjustment to In City	DDD Inflation Advantage of the Inflation		20	2017-2020		
and Wastewater Rates	PBR Inflation Adjustment to In-City Water and Wastewater Rates	PBR		PBR		
		Forecast	Actual	Forecast	Actual	
1 Forecast Inflation						
2 CPI		2.20%	1.80%	9.09%	8.24%	
3 Labour		2.40%	2.10%	9.95%	6.87%	
4 Weighted Inflation (65% CPI, 35% Labo	our)	2.27%	1.91%	9.39%	7.76%	
5 Less: Efficiency Factor	-	-0.25%	-0.25%	-1.00%	-1.00%	
6 Forecast Inflation		2.02%	1.66%	8.39%	6.76%	
7 Actual to Forecast Inflation Adjustment		-	0.08%	-	-1.64%	
8 PBR Inflation		2.02%	1.74%	8.33%	4.96%	

Lower than forecast consumption (see Section 2.2) resulted in a \$4.5 million decrease in 2020 revenues (\$13.8 million for 2017-2020). These decreases were partially offset by slight increases in customer counts which resulted in a \$0.1 million increase in revenue in 2020 (\$1.0 million for 2017-2020); and

• Non-Routine Adjustments to water rates decreased revenues by \$0.5 million in 2020 (\$5.6 million for 2017-2020). This includes a negative Non-Routine Adjustments which fulfills EPCOR's commitment to the City to flow the benefits of any reductions in corporate shared service cost allocations resulting from the transfer of Drainage Services assets to EPCOR to In-City Water and Wastewater customers, and is partially offset positive by Non-Routine Adjustments for the Lead Mitigation Strategy, Leduc County Annexation, and Water LRT Relocations, which were approved in 2019.

Besides rate revenues, In-City Water earned \$4.6 million in other revenue in 2020, \$0.5 million lower than forecast (\$1.3 million greater for 2017-2020). This decrease includes \$0.3 million in lower late payment penalties largely attributable to the 90 day utility bill deferral program which was implemented to help customers during the early stages of the COVID-19 pandemic.

2.3.2 Operating Expenses by Function

Table 2.3.2 below provides a comparison of EWSI's total water system operating expenses for 2020 to the PBR forecast.

Table 2.3.2
Water Operating Expenses by Function
(\$ millions)

	(φ) πιπιο	A	В	С	D
		202		2017-2	020
	Function and Sub-function			PBR	
		PBR Forecast	Actual	Forecast	Actual
1	Power, Other Utilities and Chemicals				
2	Power and Other Utilities	14.7	11.2	55.1	43.1
3	Chemicals	7.6	10.3	29.5	38.3
4	Power, Other Utilities and Chemicals	22.3	21.5	84.6	81.4
5	Water Operations				
6	Water Treatment Plants	20.0	21.4	77.6	76.8
7	Water Distribution and Transmission	26.1	21.0	101.4	99.9
8	Operational Support Services	7.7	5.9	30.0	26.7
9	Quality Assurance and Environment	6.7	6.3	25.2	25.2
10	Capitalized Overhead Costs	(7.6)	(8.3)	(29.3)	(31.2)
11	Water Operations	53.0	46.3	204.9	197.4
12	Billing, Meters and Customer Service				
13	Billing and Collections	8.7	9.3	33.0	32.8
14	Meter Reading, Repairs and Maintenance	2.8	2.6	11.9	8.7
15	Customer Service	0.8	0.3	3.2	2.1
16	Billing, Meters and Customer Service	12.4	12.2	48.1	43.6
17	EWSI Shared Services				
18	EWSI Shared Services	10.4	10.6	40.3	38.4
19	Incentive and Other Compensation	3.3	4.8	12.9	13.8
20	EWSI Shared Services	13.7	15.4	53.3	52.3
21	Corporate Shared Services	15.9	12.1	61.8	49.1
22	Franchise Fees and Property Taxes				
23	Franchise Fees	16.3	15.5	62.1	59.3
24	Property Taxes	0.5	0.4	1.8	1.1
25	Franchise Fees and Property Taxes	16.8	15.9	63.9	60.4
26	Total Operating Expenses by Function	134.1	123.3	516.4	484.2
27	In-City Water Share - %	82.3%	81.3%	82.3%	81.7%
28	In-City Water Share - \$	110.4	100.3	425.1	395.8

Overall, total operating expenses for 2020 were \$10.8 million lower than the PBR forecast, and \$32.2 million lower over the 2017-2020 PBR period. Key factors contributing to this difference include:

- Power and Other Utilities \$3.5 million less than forecast in 2020 (\$12.0 million less for 2017-2020) due to lower than forecast power prices (\$1.6 million in 2020 and \$6.3 million for 2017-2020) and \$1.9 million in savings associated with the green power premium (\$5.7 million for 2017-2020) that was included in the PBR forecast. The PBR forecast included annual renewable (green power) power purchases of \$1.9 million annually, starting in 2018. Rather than purchasing locally produced renewable energy, EWSI plans to construct a solar farm on land adjacent to the E.L. Smith water treatment plant. In the 2022-2026 PBR Application revenue collected through the Green Power Special Rate Adjustment has been treated as a contribution toward the E.L. Smith Solar Farm Project, which will decrease EWSI's revenue requirement and customer bills in the 2022-2026 PBR term.
- Chemicals \$2.7 million greater than forecast in 2020 (\$8.8 million greater than forecast for 2017-2020). In 2020, higher than average precipitation (surface run off) resulted in unusually high colour in the river over the summer months requiring the use of more chemicals (alum, carbon, and caustic soda) in the water treatment process. Higher than forecast costs for the 2017-2020 PBR period are also attributable to unexpected changes in river water quality, including early spring run offs and high colour in the fall.
- Water Treatment Plants \$1.4 million greater than forecast in 2020 (\$0.8 million less than forecast for 2017-2020). Higher than forecast costs in 2020 are attributable to several factors, including: higher salary costs of \$1.6 million attributable to an increase in head count (\$3.5 million higher than forecast 2017-2020); higher staff costs of \$0.6 million for facility operations transferring from Supply Chain Management to Water Treatment Plants in 2020; and higher contractor costs of \$0.6 million related to snow removal and chemical room cleaning (\$0.5 million higher than forecast 2017-2020). Higher labour costs are partially offset by a higher than forecast proportion of internal labour working on capital projects, which increased capital recoveries by \$1.1 million (\$3.6 million higher for 2017-2020), and reductions in fringe benefit costs, primarily due to lower pension contribution rates, which provided savings of \$0.4 million (\$1.8 million lower than forecast 2017-2020). The remainder of the actual to forecast difference consists of numerous small items, none of which are individually significant.
- Water Distribution and Transmission \$5.1 million lower than forecast in 2020 (\$1.5 million lower for 2017-2020). Lower than forecast costs in 2020 are attributable to several factors, including: a change in accounting treatment resulting in capitalization of valve and service replacement work which was previously expensed, which reduced operating expenses by \$3.3 million; reductions in fringe benefit costs of \$0.9 million, primarily due to lower pension contribution rates (\$3.4 million for 2017-2020); lower staff costs of \$0.6 million (\$0.3 million less for 2017-202) due to vacancies; and an increase in the recovery of fleet costs attributable to an increase in capital work of \$0.5 million in 2020 (\$1.2 million for 2017-2020). The 2017-2020 variance also includes higher than forecast costs attributable to seasonal freeze-thaw cycles in 2017 and 2018 combined with a colder than average winter in 2019 which resulted in higher than normal volumes of emergency repairs (main breaks and frozen services) over the 2017 to 2019 period. Higher emergency repairs resulted in increased overtime costs of \$2.1 million, higher contractor costs of \$3.5 million, and additional material costs of \$1.7 million. The remainder of the actual to forecast difference consists of numerous small items, none of which are individually significant.

• Operational Support Services – \$1.8 million less than forecast in 2020 (\$3.3 million less for 2017-2020). The 2017-2020 variance in this function is primarily attributable to lower staff costs of \$1.1 million related to vacant positions within the Project and Asset Management functions, \$0.8 million for the Knowledge Management function which transferred to Corporate Shared Service in 2019, and \$0.6 million for facility operations transferring from Supply Chain Management to Water Treatment Plants in 2020, combined with lower than forecast legal costs of \$0.7 million, as less external legal support was required.

- Billing, Meters, and Customer Service \$0.2 million less than forecast in 2020 (\$4.5 million less for 2017-2020). Meter reading process improvements provided savings in staff costs of \$1.1 million (\$3.7 million less for 2017-2020). Other cost savings included \$0.2 million in lower billing and customer service charges from EPCOR Energy Alberta (\$1.0 million less for 2017-2020), and \$0.4 million for lower Drainage Counter service fees (\$0.4 million less for 2017-2020). This is offset by a higher bad debt expense of \$0.8 million (\$0.8 million higher for 2017-2020), largely attributable to the COVID-19 pandemic, and higher lease costs of \$0.7 million related to end of lease obligations at the Montrose facility (\$0.3 million higher for 2017-2020). The remainder of the actual to forecast difference consists of numerous small items, none of which are individually significant.
- **EWSI Shared Services** \$1.6 million higher than forecast in 2020 (\$1.0 million less than forecast for 2017-2020). Higher than forecast costs in this category reflect a \$0.2 million increase in business unit allocations (\$1.9 less for 2017-2020) and higher than forecast incentive compensation of \$1.4 million (\$0.9 higher for 2017-2020).
- Corporate Shared Services \$3.8 million less than forecast in 2020 (\$12.6 million less than forecast
 for 2017-2020). These differences reflect both the reduction in corporate shared services cost
 allocations resulting from the transfer of Drainage from the City of Edmonton to EPCOR, which are
 fully offset by the non-routine adjustment to rates described in Section 2.1.1, as well as cost savings
 in EUI's corporate functions.
- Franchise Fees and Property Taxes \$0.9 million less than forecast in 2020 (\$3.5 million less than forecast for 2017-2020). Lower than forecast revenue resulted in a \$0.9 million reduction in franchise fees in 2020 (\$2.8 million for 2017-2020). The 2017-2020 variance includes lower than forecast property taxes relate to the deferral of the Distribution and Transmission facility which had been expected to increase Water Services property taxes by \$0.2 million annually commencing in 2017. A new shared facility for Water Distribution and Transmission and Drainage was purchased in 2020.

Variances in other operating expense functions and sub-functions are not significant, either individually or in aggregate.

In 2020, In-City Water's share of operating expenses was \$100.3 million (81.3%), compared to \$110.4 million (82.3%) in the PBR forecast. This result reflects both lower total operating expenses for EWSI's total water system and a 1.0% decrease in In-City Water's share of operating expenses determined through the cost of service model.

2.3.3 Operating Expenses by Cost Category

Table 2.3.3 below shows operating expenses by cost category for Water Operations, Billing Meters and Customer Service, and EWSI Shared Services, where cost categories differ from the sub-functions in Section 2.3.2.

Table 2.3.3
Water Operating Expenses by Cost Category
(\$ millions)

	(\$ Hillions)	Α	В	С	D
				_	_
			2020		2020
	Cost Category	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Water Operations				
2	Staff Costs and Employee Benefits	43.1	38.8	167.3	159.1
3	Contractors and Consultants	8.2	7.7	30.7	33.5
4	Vehicles	1.6	0.3	6.1	3.9
5	Materials and Supplies	3.2	3.8	12.5	14.8
6	Other	4.5	4.1	17.6	17.3
6	Capitalized Overhead Costs	(7.6)	(8.3)	(29.3)	(31.2)
7	Water Operations	53.0	46.3	204.9	197.4
8	Billing, Meters and Customer Service				
9	CUS Charges	8.7	9.3	33.0	32.8
10	Staff Costs and Employee Benefits	7.1	5.9	27.5	23.8
11	Contractors and Consultants	0.5	0.0	2.1	1.2
12	Vehicles	0.3	0.2	1.2	8.0
13	Other	0.6	1.3	2.2	2.7
14	Meter Reading Services (Recoveries)	(4.9)	(4.6)	(17.9)	(17.7)
15	Billing, Meters and Customer Service	12.4	12.2	48.1	43.6
16	EWSI Shared Services				
17	EWSI Shared Services Allocation	10.5	10.3	40.6	38.4
18	Staff Costs and Employee Benefits	3.3	4.7	13.0	13.9
19	Contractors and Consultants	0.2	0.2	8.0	0.6
20	Other	(0.3)	0.2	(1.1)	(0.6)
21	EWSI Shared Services	13.7	15.4	53.3	52.3

The information presented in this table supports the explanations of differences between 2020 actual and forecast expenses provided in Section 2.3.2. Accordingly, no additional explanations are considered necessary.

2.3.4 Depreciation and Amortization

EWSI total system depreciation expense and amortization of contributed assets for 2020 are shown in Table 2.3.4 below:

Table 2.3.4
Water Depreciation and Amortization
(\$ millions)

		Α	В	С	D	
		20	20	2017-2020		
	Depreciation and Amortization			PBR		
		Forecast	Actual	Forecast	Actual	
1	Gross depreciation expense	47.5	50.7	179.6	184.9	
2	Amortization of contributions	(10.0)	(11.5)	(39.4)	(42.7)	
3	Depreciation, net	37.5	39.2	140.2	142.2	
4	In-City Water Share - %	79.1%	78.6%	78.9%	78.9%	
5	In-City Water Share - \$	29.6	30.8	110.7	112.1	

Depreciation expense and amortization of contributions are both higher than forecast reflecting higher than forecast levels of developer-funded assets, explained in Section 2.3.5 below. These impacts are offsetting, so actual depreciation expense, net of amortization, is within \$1.7 million of forecast. This increase in depreciation expense is driven by higher than forecast capital expenditures as discussed in Section 2.4.1.

In-City Water's share of 2020 depreciation expense is 0.4% lower than forecast, 1.0% of this difference is attributable to higher than forecast assets additions for fire protection related assets (hydrants). The offsetting 0.6% difference is consistent with actual to forecast differences in the base and max day peaking factors used to allocate depreciation expense between In-City customer classes versus that charged to the RWCG.

2.3.5 Rate Base

In 2020, EWSI's total water system rate base, shown in Table 2.3.5 below, was \$34.9 million more than forecast, with the higher than forecast gross rate base partially offset by higher than forecast contributions.

Table 2.3.5
Water Mid-Year Rate Base
(\$ millions)

	·	Α	В
		20:	20
	Components of Mid-Year Rate Base	PBR	
		Forecast	Actual
1	Plant in Service		
2	Balance, beginning of year	2,439.3	2,545.4
3	Additions - EPCOR-funded	94.4	119.2
4	Additions - Developer-funded	7.3	33.8
5	Retirements and adjustments	-	(10.4)
6	Balance, end of year	2,541.0	2,688.0
7	Mid-Year Plant in service	2,490.2	2,616.7
8	Accumulated Depreciation		
9	Balance, beginning of year	650.9	633.8
10	Depreciation expense	47.5	50.8
11	Retirements and adjustments	-	(10.2)
12	Balance, end of year	698.4	674.4

		Α	В
		202	20
	Components of Mid-Year Rate Base	PBR	
		Forecast	Actual
13	Mid-Year Accumulated Depreciation	674.7	654.1
14	Other Rate Base Items		
15	Working Capital	23.4	22.5
16	Materials and Supplies	2.9	4.0
17	Gross Mid-Year Rate Base	1,841.8	1,989.1
19	Contributions		
20	Balance, beginning of year	693.9	795.9
21	Contributions in aid of construction	7.3	33.8
23	Balance, end of year	701.2	829.7
24	Mid-Year Contributions	697.6	812.8
25	Accumulated Amortization		
26	Balance, beginning of year	178.0	180.1
27	Amortization of contributions	10.0	11.5
28	Balance, end of year	188.0	191.6
29	Mid-Year Accumulated Amortization	183.0	185.8
30	Mid-Year Contributions	514.6	627.0
31	Net Mid-Year Rate Base	1,327.2	1,362.1

The gross rate base reflects significantly higher than forecast levels of developer-funded assets over the 2016 to 2020 period. Developers are responsible for construction of distribution infrastructure in new subdivisions. When these assets are placed into service, ownership of the assets is transferred to EWSI, where the assets, together with offsetting contributions in aid of construction, are added to the rate base.

In 2020, the net mid-year rate base is \$34.9 million or 2.6% more than forecast. This increase in rate base is driven by higher than forecast capital expenditures as discussed in section 2.4.1.

2.3.6 Return on Rate Base

In 2020, In-City Water's return on equity was \$0.3 million (0.6%) more than forecast and \$6.6 million (4.1%) less for 2017-2020. In 2020, this increase was attributable to EWSI's actions to control operating costs combined with a change in accounting treatment resulting in additional capitalization of expenses, which largely offsets a significant decline in revenue.

Table 2.3.6-1
Return on In-City Water Share of Mid-Year Rate Base (\$ millions)

		Α	В	С	D
		20	20	2017-	-2020
	Return on Rate Base	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Net Mid-Year Rate Base	1,327.2	1,362.1		
2	In-City Water Share - %	78.9%	78.1%		
3	In-City Water Share - \$	1,047.6	1,063.3		
4	Deemed Capital Structure				
5	Debt (%)	60.00%	60.00%		
6	Equity (%)	40.00%	40.00%		
7	Cost of Capital				
8	Cost of Debt	4.84%	4.60%	4.87%	4.81%
9	Cost of Equity	10.18%	10.09%	10.18%	9.73%
10	Weighted Average Cost of Capital (WACC)	6.97%	6.80%	6.99%	6.78%
11	Return on Mid-Year Rate Base				
12	Return on Rate Base Financed by Debt	30.4	29.4	114.7	113.5
13	Return on Rate Base Financed by Equity	42.6	42.9	159.7	153.1
14	Total Return on In-City Water Rate Base	73.0	72.3	274.4	266.6

In-City Water's share of the total system net mid-year rate base is 0.8% less than forecast. This reflects a 1.5% decrease attributable to higher than forecast asset additions for fire protection related assets (hydrants) offset by a 0.7% increase related to the change in In-City Water's demands on water system relative to that of Regional Customers. The In-City Water net mid-year rate base is within 1.5% of the forecast amount.

Return on rate base is calculated separately for the debt-financed and equity-financed portions of In-City Water's net rate base. The rate of return on debt is equal to the embedded cost of debt for EWSI's total water system, as calculated in Table 2.3.6-2 below:

Table 2.3.6-2
Interest Expense and Cost of Debt
(\$ millions)

		Α	В	С	D
		20	20	2017-2020	
	Interest Expense and Cost of Debt	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Interest expense				
2	Interest on short-term debt	0.9	0.2	3.9	3.9
3	Interest on City of Edmonton debentures	0.4	0.4	2.6	2.6
4	Interest on intercompany debentures	36.5	35.8	136.7	133.9
5	Total interest expense	37.9	36.4	143.1	140.3
6	Mid-year debt and other long-term liabilities				
7	Mid-Year Short-term debt	32.7	10.6		
8 Mid-Year Long-term debt		747.9	777.9		
9	Mid-Year Other Long-term liabilities	1.8	2.3		
10	Total mid-year debt and other long-term liabilities	782.4	790.7		
11	Embedded Cost of Debt	4.84%	4.60%	4.87%	4.81%

The embedded cost of debt is lower than forecast in 2020. Although, EWSI issued more long term debt than forecast, which is more expensive that short term debt, due to favorable economic conditions EWSI was able to issue the long term debt at lower than forecast rates over the 2017 to 2020 period.

2.3.7 Transactions with Affiliates

In-City Water derives a significant proportion of its revenue and expenses from transactions with affiliates, including the City of Edmonton, EUI and its subsidiaries, and other EWSI business units. Table 2.3.7 provides a summary of In-City Water's 2020 actual and forecast transactions with affiliates.

Table 2.3.7
Transactions with Affiliates
(\$ millions)

	(\$ illillolis)	Ι Δ			Б
		A	В	C	D
	Affiliate and Comitee	20	20	2017-	2020
	Affiliate and Service	PBR	Actual	PBR	Antural
4	Decrease from the manifold of comings to the City of	Forecast	Actual	Forecast	Actual
1	Revenues from the provision of services to the City of				
_	Edmonton Public Fire Protection	12.2	12.0	46.0	45.0
2		3.4		46.2	45.9
3 4	Water sales	0.2	2.2	13.0	12.4
5	Other	_	- 112	0.9	0.1
	Total	15.8	14.2	60.2	58.4
6	Services provided by (recovered from):				
7	City of Edmonton	40.0	45.5	00.4	50.0
8	Franchise Fees	16.3	15.5	62.1	59.3
9	Property Taxes	0.5	0.4	1.8	1.1
10	Interest on City of Edmonton Debentures	0.4	0.4	2.6	2.6
11	Mobile equipment services	2.0	2.3	7.6	9.1
12	Other services	1.4	0.2	5.4	2.3
13	Meter Reading Recoveries	-	-	-	(1.4)
14	Total	20.6	18.9	79.4	72.9
15	EPCOR Utilities Inc.				
16	Corporate Shared Service Costs	15.9	12.1	61.8	49.1
17	Interest on Intercompany Debentures	36.5	35.8	136.7	133.9
18	Interest on Short-term debt	0.9	0.2	3.9	3.9
19	Other Services	-	0.6	-	0.9
20	Total	53.4	48.1	202.4	187.8
21	EPCOR Distribution and Transmission Inc.				
22	Meter Reading Recoveries	-	-	-	(0.5)
23	Other services	0.1	-	0.5	0.0
24	Total	0.1	-	0.5	(0.5)
25	EPCOR Technologies Inc.				
26	Hydrovac Charges and Space Rentals	0.9	1.2	3.6	6.0
27	Other Services (Recoveries)	-	(0.1)	-	(0.2)
28	Total	0.9	1.2	3.6	5.8
29	EPCOR Energy Alberta LP				
30	Customer Billing and Collection Services	8.7	9.3	33.0	32.8
31	Meter Data Management	_	0.3	-	0.8
32	Trouble Call Support Services	_	0.6	-	
33	Total	8.7	10.1	33.0	33.6
34	EPCOR Power Development				
35	Other Services (Recoveries)	_	(0.2)	_	(0.6)
	5 2 SST 11000 (1 1000 101100)	I	(0.2)	L	(0.0)

		Α	В	С	D
		20	20	2017-	2020
	Affiliate and Service	PBR		PBR	
		Forecast	Actual	Forecast	Actual
36	EPCOR Commercial Services				
37	Commercial Services Rent Recoveries	-	1	-	(0.7)
38	Other EWSI Business Units				
39	EWSI Shared Services Allocation	10.5	10.3	40.6	38.4
40	Water Sales to Wastewater	(0.4)	(0.4)	(1.5)	(1.7)
41	Meter Reading Recoveries from Wastewater	(2.5)	(2.4)	(9.0)	(9.3)
42	Meter Reading Recoveries from Drainage Services	(2.5)	(2.4)	(9.0)	(7.7)
43	Customer Service Fees from Drainage Services	-	-	-	0.9
44	Other Services provided to Drainage Services	-	(0.3)	-	(0.5)
45	Meter Reading Recoveries from Other EWSI Business				
	Units	-	-	-	(0.1)
46	Quality Assurance Lab Testing and Other Services from				
	Other EWSI Business Units	-	-	-	0.2
47	Drainage Services Rent (Recoveries)	-	(0.2)	-	(0.2)
48	Total	5.2	4.5	21.1	20.0
49	Expenditures on capital projects arising from services				
	provided by:				
50	City of Edmonton	3.2	0.5	12.5	3.0
51	EPCOR Technologies Inc.	4.1	5.7	15.7	18.6
52	EPCOR Utilities Inc.	-	2.3	-	5.1
53	EPCOR Drainage Services	_	2.6	-	9.1
54	EPCOR Distribution and Transmission Inc.	0.1	0.2	0.5	1.2
55	Other EPCOR Business Units	_	-	-	0.2
56	Total	7.3	11.3	28.7	37.1

2.4 Capital Programs

2.4.1 Capital Expenditures

Table 2.4.1 compares approved capital expenditures from the PBR forecast to actual capital expenditures for 2020 for each project with approved or forecast capital expenditures in excess of \$5.0 million over the 2017-2021 PBR term, as well as for each project category. Table 2.4.1 also provides a comparison of total 2017-2021 approved capital expenditures to EWSI's current capital forecast.

Table 2.4.1 Capital Expenditures (\$ millions)

	(4 1111110110)										
		Α	В	С	D	E	F	G	Н	I	
			2020			2017-2020			2017-2021	1	
		PBR	Actual	Difference	PBR	Actual	Difference	PBR	Current	Difference	
4	Demoletem	Forecast*	Actual	Difference	Forecast*	Actual	Difference	Forecast"	Projection	Difference	4
1	Regulatory	0.4	4 7	0.0		40.7	0.7	40.0	45.5	5.0	
2	Water Services Replacement/Refurbishment	2.1	4.7	2.6	8.0	10.7	2.7	10.2	15.5	5.3	1
	Accelerated Lead Service Replacement (NRA)	2.8	2.5	(0.3)	3.6	2.5	(1.1)	5.9	6.0	0.1	
4	Phosphoric Injection for Lead Control (NRA)	-	1.0	1.0	9.8	2.3	(7.5)	9.8	8.7	(1.1)	
5	Projects < \$5 Million	0.3	0.1	(0.2)	1.2	1.7	0.5	1.5	2.0	0.5	4
6	Subtotal	5.2	8.3	3.1	22.6	17.2	(5.5)	27.4	32.2	4.8	
7	Growth/Customer Requirements			45.5				l			
8	Network PD Transmission Mains	2.3	1.3	(0.9)	10.4	18.9	8.6	14.4	26.7	12.3	3
9	Distribution System Modifications	1.0	2.2	1.2	5.0	5.8	0.8	6.0	14.4	8.3	
10	Water Main Cost Sharing Program	0.5	2.0	1.6	2.2	6.2	4.0	3.0	7.6	4.6	4
11	Water Services Connections	5.1	4.6	(0.5)	18.2	21.9	3.7	23.6	27.2	3.7	5
12	New Water Distribution Mains	1.8	1.6	(0.2)	7.0	8.5	1.5	8.8	10.8	1.9	
13	LRT Relocates (NRA)	6.0	8.5	2.5	18.9	21.9	3.0	24.9	25.6	0.7	
14	Discovery Park Reservoir & CRSWSC	0.4	9.2	8.8	9.2	9.5	0.3	9.2	9.7	0.4	
	Pipe Line (NRA)										
15	PD Construction Coordination	3.5	2.6	(1.0)	11.8	10.4	(1.4)	15.4	13.3	(2.1)	
16	New Meter Purchase/Installation	3.0	2.1	(0.9)	10.1	8.9	(1.1)	13.2	11.2	(2.0)	6
17	Projects < \$5 Million	0.2	0.0	(0.2)	2.3	6.5	4.1	2.6	8.9	6.3	7
18	Subtotal	23.8	34.0	10.2	95.1	118.5	23.4	121.2	155.4	34.1	1
19	Health, Safety & Environment										
20	Solar Power Systems (including	-	(3.0)	(3.0)	-	1.4	1.4	-	26.0	26.0	8
	BESS) Project (net)		, ,	` ,							
21	E.L. Smith - Deep Bed Filtration	10.3	0.0	(10.3)	11.6	0.4	(11.3)	22.3	0.4	(22.0)	9
22	Projects < \$5 Million	0.8	0.7	(0.1)	3.1	3.0	(0.1)	4.3	3.3	(1.0)	
23	Subtotal	11.1	(2.3)	(13.4)	14.7	4.7	(10.0)	26.6	29.6	3.0	ĺ
24	Reliability & Life Cycle Improvements		, ,	` ,			, ,				
25	Obsolete Valve Replacement Program	0.8	4.4	3.5	3.3	9.1	5.8	4.1	13.4	9.3	10
26	Structural Rehab Program - E.L. Smith	0.5	1.6	1.1	1.5	3.1	1.5	2.0	10.1	8.1	9
27	Obsolete Hydrants Replacement Program	0.9	2.6	1.7	3.5	7.8	4.3	4.4	10.4	6.0	11
28	Chemfeed Upgrades – E.L Smith	0.5	2.5	2.0	3.6	6.8	3.2	4.0	8.9	4.9	12
29	Chemfeed Upgrades - Rossdale	0.5	1.8	1.4	3.3	7.8	4.5	4.0	8.4	4.4	13
30	Rossdale Filter Underdrain Upgrades	1.2	0.1	(1.2)	4.7	8.1	3.4	4.7	8.1	3.4	14
31	E.L. Smith - Bypass (Ring) Main	5.2	5.6	0.4	7.0	6.2	(0.8)	7.0	10.4	3.4	15
32	HVAC Upgrades – E.L Smith	0.6	0.0	(0.6)	2.8	4.9	2.1	3.4	5.0	1.6	. •
33	Mechanical Upgrades – E.L Smith	0.7	1.1	0.4	4.1	5.8	1.7	4.9	6.4	1.5	
34	Network Valve Chamber Refurbishment	1.1	2.1	1.0	4.4	5.7	1.3	5.6	7.0	1.4	
35	Rossdale Clarifier C1-2 Upgrade	'		-	4.3	5.5	1.1	4.3	5.5	1.1	
36	Vehicle & Fleet Additions	2.2	3.7	1.6	10.1	9.6	(0.5)	11.8	12.1	0.3	
1 00	Vollidio & Floot / (dditions	2.2	0.7	1.0	1 10.1	1 3.0	(0.0)	1 11.0	1 12.1	0.0	II.

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		Α	В	С	D	Е	F	G	Н	I]
			2020			2017-2020			2017-2021		
		PBR			PBR			PBR	Current		
		Forecast*	Actual	Difference	Forecast*	Actual	Difference	Forecast*	Projection	Difference	
37	Water Meter Change Out Program	6.9	2.0	(4.9)	19.0	10.9	(8.1)	25.6	12.8	(12.8)	16
38	Water Main Proactive Renewal	3.7	3.8	0.1	14.2	15.0	0.8	18.0	15.1	(2.9)	17
39	Electrical Upgrades - Reservoirs	8.0	0.2	(0.6)	4.1	2.4	(1.7)	5.3	2.6	(2.7)	18
40	Water Main Reactive Renewal	12.2	11.4	(8.0)	41.1	45.9	4.8	54.7	52.0	(2.6)	19
41	Transmission Mains Replacement/Refurbish	2.8	1.9	(8.0)	10.4	10.5	0.1	13.3	11.7	(1.6)	
42	Cell/Pumphouse Roof Replacement	-	0.1	0.1	4.9	1.6	(3.3)	6.3	5.0	(1.3)	
43	SCADA System Upgrade Program	0.7	0.9	0.1	5.0	3.7	(1.3)	5.7	4.6	(1.1)	
44	Electrical Upgrades - Rossdale	1.2	0.4	(8.0)	3.7	3.6	(0.2)	5.2	4.3	(0.9)	
45	Projects < \$5 Million	13.9	11.0	(2.9)	56.6	57.4	0.9	68.0	75.3	7.3	20
46	Subtotal	56.3	57.1	0.9	211.6	231.2	19.5	262.4	289.0	26.6	
47	Performance Efficiency & Improvement										
48	Water D&T Facility Expansion	-	12.7	12.7	16.0	12.7	(3.3)	16.0	22.5	6.5	21
49	Water Main Cathodic Protection	4.3	4.6	0.3	16.6	14.6	(2.1)	21.0	18.1	(2.9)	22
50	Projects < \$5 Million	0.7	2.8	2.1	6.8	5.9	(1.0)	7.1	6.4	(0.7)	
51	Subtotal	5.0	20.1	15.1	39.4	33.1	(6.3)	44.1	47.0	2.8	
52	Accelerated										
53	Accelerated Water Main Renewal	10.6	11.2	0.6	41.0	41.7	0.7	51.9	41.4	(10.5)	23
54	Accelerated Fire Protection	3.9	1.1	(2.7)	13.3	8.6	(4.7)	15.9	9.8	(6.1)	24
55	Subtotal	14.5	12.4	(2.1)	54.4	50.4	(4.0)	67.8	51.2	(16.6)	
56	Capital Expenditures before contributions										
57	Contributions										
58	Water Services Connections	(5.1)	(2.7)	2.3	(18.2)	(13.6)	4.6	(23.6)	(17.2)	6.4	5
59	Private Development Contributions	(0.5)	(0.1)	0.3	(1.5)	(0.9)	0.5	(1.9)	(1.2)	0.7	
60	New Water Distribution Mains	(1.8)	(1.0)	0.8	(7.0)	(7.2)	(0.2)	(8.8)	(9.3)	(0.5)	
61	Subtotal	(7.3)	(3.9)	3.5	(26.6)	(21.7)	5.0	(34.3)	(27.7)	6.6	
62	Capital Expenditures	108.5	125.8	17.3	411.2	433.3	22.1	515.3	576.6	61.4	

^{*} Amounts include capital expenditures approved through Non-Routine adjustments.

Explanations for differences between PBR forecast capital expenditures for 2017 to 2021 and EWSI's current projection in excess of \$2.0 million on individual projects with total costs in excess of \$5.0 million, as well as for project categories in aggregate include:

- 1. Water Services Replacement/Refurbishment \$5.3 million (52%) greater than forecast. This program includes relocation of water service lines that do not meet current servicing standards, reactive replacements of service box and components, and customer-initiated lead service replacements (EPCOR portion of water service lines only). The increased expenditure in the 2017-2021 PBR term is primarily due to a high than expected number services qualifying for replacements combined with the increased capitalization of replacement costs that were previously expensed.
- 2. Network PD Transmission Mains \$12.3 million (85%) greater than forecast. This program represents the reimbursement of the costs incurred by private developers to extend the transmission network (450 mm and larger in diameter) to new subdivisions. Since developers determine both the timing of projects and the areas to be developed, expenditures on this program have proven difficult to forecast. Significant additions to this program include transmission main projects for Ellerslie Road Arterial Twinning Project, 28th Avenue SW/Whitemud Creek Crossing, the Horse Hills Creek/Meridian Street Crossing, 199th Street from 23rd Avenue to 35th Avenue, and Aurum Road 9th Street to 17th Street.
- 3. **Distribution System Modifications** \$8.3 million (139%) greater than forecast. This program includes relocating or modifying existing water mains and appurtenances to eliminate conflicts arising from COE projects, primarily related to road or sidewalk widening. The increase in program expenditures primarily relates to the combination of the COE's Yellowhead Trail Freeway Conversion project (\$4.5 million), the 50th Street Overpass project (\$1.8 million), and a large number of additional neighborhood renewals and transportation projects, which were unforeseen in prior years.
- 4. **Water Main Cost Sharing** \$4.6 million (151%) greater than forecast. This program provides private developers with a partial rebate for the construction of water mains 300 to 400 mm in diameter. Similar to Network PD Transmission Mains, the costs of this program are driven by developer activity. The increase in the costs of this program result from higher than forecast developer activity during the PBR term.
- 5. Water Services Connections (net of contributions) \$10.0 million (100%) greater than forecast. This program provides for the construction of new water services for infill developments and redevelopments. Contributions from private developers were forecast to recover 100% of the construction costs for new water service connections. EWSI found that after accounting for all program costs, its service application rates provide for recovery of less than 75% of the total program costs. Currently, EWSI's costs for completing service connections are recovered through a fee schedule outside the Bylaw and does not reflect EWSI's full cost for these activities. In the 2022-2026 PBR Application EWSI has updated the charge to a cost of service basis for each service connection, which will ensure EWSI achieves 100% recovery in the 2022-2026 PBR term.
- 6. **New Meter Purchase/Installation** \$2.0 million (15%) less than forecast. The purpose of this program is to comply with the Bylaw, which requires that all water consumed by customers must be metered. The decreased program costs relate primarily to lower activity during the COVID-19 pandemic period, during which home visits have been minimized.
- 7. **Growth and Customer Requirements < \$5.0 million** \$6.3 million (247%) greater than forecast. The projected increase in this category results primarily from the unbudgeted Laurel Booster Station

project needed to address development in a high elevation area (\$1.7 million), additional costs to acquire water mains from the Capital Region Northeast Water Service Commission following city expansion (\$2.7 million), unbudgeted capital expenditures related to the acquisition of land necessary to construct a future reservoir to supply future water customers between 41 Avenue Southwest and the Edmonton International Airport (\$1.6 million), which are partially offset by capital expenditure reductions in other growth projects.

- 8. **E.L. Smith Solar Farm and Battery Storage (net of contributions)** \$26.0 million (new projects). As noted in Section 2.3.2, instead of purchasing locally produced renewable power at an annual cost of \$1.9 million, EWSI plans to construct a solar farm at E.L. Smith. The solar farm is expected to include a battery energy storage system that would be almost entirely grant-funded. The solar farm will include approximately 45,000 solar panels located on 51 acres of land to the southwest of the water treatment plant, and is expected to generate 21,500 MWh of renewable electricity in its first year of operations.
- 9. **Deep Bed Filtration Conversion E.L Smith** \$22.0 million (99%) less than forecast and **Structural Rehabilitation Program E.L Smith** \$8.1 million (400%) greater than forecast. During engineering inspections in 2018, EWSI identified immediate needs for structural rehabilitation of the E.L. Smith Stage 1 and Stage 2 filter plenums (12 filters in total). Accordingly, the conversion to deep bed has been postponed to the 2032-2036 PBR term so that the required structural rehabilitation and upgrades can be completed first.
- 10. **Obsolete Valve Replacement Program** \$9.3 million (225%) greater than forecast. Higher than expected rates of deterioration, requiring adjustments to valve replacement schedules, combined with the increased capitalization of replacement costs that were previously expensed are attributable for the increase in project costs. Although the projected cost of this program has increased substantially, improving overall valve operability in the system reduces isolation time, lessens the potential for property damage and mitigates customer impacts during emergency main break response.
- 11. Obsolete Hydrant Replacement Program \$6.0 million (136%) greater than forecast. Similar to the obsolete valve replacement program, higher than expected rates of deterioration have led to increased backlog, requiring adjustments to hydrant replacement schedules. EWSI has adjusted its hydrant replacement schedule to clear backlogs and ensure fire protection service levels are maintained.
- 12. **Chemfeed Upgrades E.L Smith** \$4.9 million (122%) greater than forecast. Higher than estimated costs for a significant fluoride room upgrade to replace end-of-life equipment, and unanticipated upgrades to the sodium hypochlorite room, including new generation cells, are the primary factors contributing to the increase in the costs of this program.
- 13. **Chemfeed Upgrades Rossdale** \$4.4 million (109%) greater than forecast. EWSI identified significant health, safety and environmental needs, requiring extensive upgrades to the sodium bisulphite room, which accounts for the majority of the program overage during the current PBR term.
- 14. **Filter Underdrain Upgrades Rossdale** \$3.4 million (72%) greater than forecast. Both the scope and cost of this project have increased following an inspection of the filter underdrain system that identified unforeseen needs for upgrades to air scour systems, combined with an unexpected increase in the price of steel.

15. **Bypass Main (Ring Main) – E.L Smith** – \$3.4 million (48%) greater than forecast. The scope of this project includes the construction of a new bypass primary feeder to help ensure redundancy and uninterrupted service to North and West Edmonton. In 2019, a historical resource impact assessment confirmed the presence of cultural materials within the proposed construction area, requiring archaeological mitigation, and increasing total project costs. Further design also identified the requirement for additional manual isolation valves to improve operational flexibility and isolation redundancy.

- 16. Water Meter Change out Program \$12.8 million (50%) less than forecast. The decrease in the projected cost of this program results from an improvement in the expected lives of the batteries used in the meters. As a result, fewer meters are expected to require replacement during the current PBR term.
- 17. **Water Main Proactive Renewal** \$2.9 million (16%) less than forecast. This project is very closely tied to Reactive Renewal and includes replacements or upgrades of water mains in older areas where water mains do not conform to current design standards for water quality, fire protection, and system reliability.
- 18. **Electrical Upgrades Program Reservoirs** \$2.6 million (49%) less than forecast due to the deferral of lower priority electrical upgrades to a future PBR terms.
- 19. Water Main Reactive Renewal \$2.6 million (5%) less than forecast. Actual-to-forecast variances for this program generally correlate with the number of main breaks occurring, which is dependent upon weather conditions. Although the unit cost of construction for water main replacements has increased due to changes in the City's road restoration standards, increased traffic accommodation requirements, and an increase in transmission mains that qualify for replacement, the ongoing decrease in cast iron water main breaks has resulted in a decrease in the total length of candidates to be replaced, which more than offsets the increase in renewal costs per linear foot.
- 20. Reliability and Life Cycle Improvements < \$5.0 million \$7.3 million (11%) greater than forecast. The projected increase in this category result primarily from the combination of the increased scope of the Rossdale stilling basin upgrade project (\$3.0 million); accelerated roof and structural upgrades to Rossdale Reservoir Cell #1 (\$4.2 million), and unbudgeted CRNWSC and NW transmission main inspection costs (\$3.7 million). These increases were offset by the deferral of lower priority Rossdale roof replacements (\$2.0 million), E. L. Smith electrical upgrades (\$2.5 million) and a significant portion of the E.L. Smith High Level Pump #5 upgrades to the next PBR term (\$3.7 million). The remaining increase was related mainly to other annual water treatment plant programs required to rehabilitate or replace on a life-cycle basis. Within each of these programs, the most critical work was prioritized for completion within the current PBR term and deferrable projects were rescheduled for future terms.
- 21. Water D&T Facility Expansion \$6.5 million (41%) greater than forecast. Completion of the D&T Facility was originally planned for 2017. This project has been re-scoped following the transfer of Drainage to EPCOR and the completion of an EPCOR-wide real estate review. The review concluded that a consolidated solution for Water and Drainage would provide long-term synergies and operational efficiencies that would outweigh the additional capital costs. In August 2020, EWSI finalized the purchase of a developed property on Aurum Road in North East Edmonton, which is ideally suited to EWSI long term needs. Site renovations will be required before large scale moves can occur in late 2021 and are included within the projected capital expenditure overage for this

- project. The costs for the project have been allocated 40% to Water Services and 60% to Drainage Services based on estimated headcount.
- 22. Water Main Cathodic Protection \$2.9 million (14%) less than forecast. The reduction in the costs of the program result from adoption of more efficient anode installation processes combined with delays attributable to the ongoing COVID-19 pandemic.
- 23. **Accelerated Water Main Renewal** \$10.5 million (20%) less than forecast. The expenditures within this program are largely dependent upon the City paving program plans and the water main break frequency. The reduction in the forecasted program is primarily due to the reprioritization of other more critical lifecycle and reliability programs.
- 24. Accelerated Fire Protection \$6.1 million (38%) less than forecast. EWSI expects that expenditures over the remainder of the 2017-2021 PBR term will be less than approved amounts, due to a smaller number of potential sub-projects meeting the Accelerated Fire Protection Program criteria. EWSI has allocated a portion of the additional funding towards the Infill funding program that was introduced in 2019. This is a trail program that offsets the costs of infrastructure upgrades in infill areas and was developed in conjunction with IDEA and the COE. Additionally, funding has also been directed to critical work which has been identified in areas such as Distribution System Modifications (for Citydriven relocates) and Transmission Main inspection work where capital expenditures are expected to exceed levels in the PBR forecast.

2.4.2 Construction Work in Progress

In-City Water's rate base consists of plant in service. If a capital project is not completed (i.e. not placed into service) in the year, the capital expenditures on that project remain in Construction Work in Progress and are excluded from the rate base. In 2020, as shown on Table 2.4.2, the balance in Construction Work in Progress was \$15.4 million greater than forecast, of which \$6.7 million relates to the new Water D&T and Drainage shared facility, and \$6.2 million for the E.L. Smith Bypass Main project.

Table 2.4.2
Construction Work in Progress
(\$ millions)

	Α	В	С	D	
	202	0	2017-2020		
Construction Work in Progress	PBR		PBR		
	Forecast	Actual	Forecast	Actual	
1 Balance, beginning of period	4.7	20.7	0.3	3.8	
2 Capital Expenditures	101.5	125.8	377.8	433.2	
3 Capital Additions	(94.4)	(119.2)	(366.3)	(409.8)	
4 Balance, end of period	11.8	27.2	11.8	27.2	

The PBR plan allows EWSI to capitalize the costs of financing certain projects remaining in Construction Work in Progress, using an allowance for funds utilized during construction (AFUDC). In 2020, AFUDC included in capital expenditures on eligible projects amounted to \$1.4 million, compared to the PBR forecast amount of \$0.7 million.

2.5 Operational Performance

2.5.1 Water Quality Index

The Water Quality index is calculated as the percentage of water quality test results that meet EWSI's internal water standards. Water quality standards are established by both the federal and provincial governments and are incorporated into EWSI's Approval to Operate from Alberta Environment and Parks (AEP). In some cases, EWSI sets even stricter limits for critical parameters that are identified in EWSI Quality Standards, to provide early warnings of potential water quality problems; so that corrective actions can be taken before external standards are not met.

Table 2.5.1 Water Quality Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index
Water Quality Index	The percentage of the total number of water quality tests taken in the period that do not yield suspect results	> 99.7%	99.8%	1.001
		A۱	verage Index	1.001
		Index Sta	ndard Points	25.0
	Total Actual Points			25.0
	Maximum Available Poir	nts Including E	Bonus Points	25.5
		Total Po	ints Earned	25.0

2020 Highlights

• Water Quality Index: EWSI met all Health Canada Drinking Water Quality Guidelines and Alberta Environment and Parks' water quality testing requirements in 2020. During the year, EWSI collected 59,271 samples of treated drinking water, of those samples only 147 (0.25%) did not meet EWSI internal water quality standards.

The majority of variances from EWSI internal water quality standards in 2020 were related to temporary increases in turbidity and/or decreases in chlorine concentrations in samples collected from the distribution system. Customer water quality inquiries were also related to increased turbidity and/or decreased chlorine.

2021 Areas for Improvement

• Water Quality Index: Increases in turbidity and/or decreases in chlorine concentrations, can be partly explained by changing water consumption patterns resulting from the COVID-19 pandemic. In response to changing consumption patterns EWSI developed a communication strategy to encourage large facility owners to flush their building's plumbing system when experiencing low occupancy. Additionally, EWSI conducted an analysis of the distribution system looking for areas of low consumption (increased stagnation) where increases in turbidity and/or decreases in chlorine concentrations were more likely to occur. Based on this distribution system assessment, additional flushing activities were completed in areas where potential stagnation was identified. Both of these programs will also continue in 2021.

2.5.2 Customer Service Index

The customer service index is a composite measure of the customers' perception of satisfaction with EWSI service, the aesthetic quality of water and speed of response to customer issues.

Table 2.5.2
Customer Service Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index
Post Service Audit Factor	The percentage of the customers responding as "completely" or "very satisfied" in the level of service received from the EWSI Emergency group.	> 74.9%	74.2%	0.990
Home Sniffing Factor	The percentage result of customer satisfaction for the home sniffing survey.	> 94.4%	95.1%	1.008
Response Time Factor	The average number of minutes needed to confirm a water main break from the time a call is received at EWSI's dispatch office.	< 25	17.8	1.290
Planned Construction Impact Factor	The percentage of the total planned construction events where EWSI complies with required construction notification procedures.	> 95.8%	97.3%	1.015
		Ave	erage Index	1.076
		Index Stan	dard Points	20.0
			ctual Points	21.5
	Maximum Available Poin			23.0
		Total Poi	nts Earned	21.5

2020 Highlights

- Post Service Audit (PSA) Factor: In 2020, EWSI continued to focus on enhancing the customer experience and continued to see improvement to the PSA compared to prior years. Water worked with Drainage Services and EPCOR Distribution & Transmission to establish common call handling processes for utility related emergencies.
- Home Sniffing Factor: The Home Sniffing program is designed to measure the impact of spring runoff in the river and the effectiveness of water treatment during this period, particularly in terms of mitigating run-off related odours at the tap. Spring runoff started in mid-April and its intensity and duration posed some of the greatest challenges the Edmonton water treatment plants have experienced in recent years. Despite these challenges, production was maintained, and taste and odour concerns were managed effectively. Through information collected from 300 home sniffers, data trends were analyzed which provided useful feedback for plant operators during spring runoff.
 - Following the three-month customer home sniffing monitoring period, the 2020 customer satisfaction factor was 95.1%, which exceeded the target of 94.4%.
- Response Time Factor: EWSI continued to exceed the Response Time Factor through efficient dispatching of crews. Crews are typically assigned to a quadrant and stay within that quadrant allowing efficient dispatching to main breaks.

Planned Construction Impact Factor: A number of newly hired inspectors and coordinators were
trained in 2020 on the steps required to meet targets for the Planned Construction Impact Factor.
This included formal workshops and informal training sessions through job shadowing. Additional
improvements included development of further refined construction coordination plans and
enhancements to IT infrastructure for field resources to improve field-to-office communication and
give better visibility on construction timelines.

2021 Areas for Improvement

- Post Service Audit (PSA) Factor: In 2021, EWSI will continue to focus growing the customer service culture through first call resolution, procedure reviews, and continuing to build customer service skills.
- **Home Sniffing Factor**: A major improvement in 2020 was having next-day home sniffing results available daily, including weekends. This increased response frequency will continue in 2021.
 - In 2021, extra emphasis will be placed on home sniffing recruitment to ensure that the home sniffers' distribution represents all areas of the City. Further, measures are required to reduce multiple entries and to encourage home sniffers to submit their results on the day the sniff test is completed, and EWSI will be encouraging participants to stay involved throughout the full monitoring period.
- Planned Construction Impact Factor: In 202,1 there will be an increased focus on managing
 construction projects that are completed with internal Water D&T crews. Additionally, customer
 notification letters will be revised to include more useful information for customers, and level 3 process
 maps for all construction coordination activities will be developed to help firm up existing processes
 that are used to complete these construction projects.

2.5.3 System Reliability and Optimization Index

The System Reliability Index is a measure of the confidence that customers can place in the reliability of the waterworks system.

Table 2.5.3
System Reliability and Optimization Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index
Water Main Break Factor	The number of water main breaks that occurred in the reporting period.	< 419	201	1.520
Water Main Break Repair Duration Factor	The percentage of water main breaks repaired and confirmed by EWSI within 24 hours from the time that the flow of water is shut off, excluding main breaks on arterial or collector roads.	> 93.7%	98.2%	1.048
Water Loss Factor	The Infrastructure Leakage Index, a performance indicator quantifying how well a water distribution system is managed for the control of "real" water losses (i.e. leakage).	< 2.0	0.84	1.580

Index Component	PBR Performance Measure	Standard	Actual Score	Index
System Energy Efficiency Factor	The energy used at all water facilities in kWh divided by the average annual water production per residential customer account (ML/kWh/customer).	< 309	249	1.243
Average index				1.348
Index Standard Points				25.0
Total Actual Points				33.7
Maximum Available Points Including Bonus Points				28.5
Total Points Earned				28.5

2020 Highlights

- Water Main Break Factor: EWSI experienced 201 water main breaks in 2020. This is 218 less than the PBR standard of 419. This result is attributable to fewer breaks during winter months as well as the effectiveness of past and on-going water main replacement programs.
- Water Main Break Repair Duration Factor: In 2020, 98.2% of main breaks were repaired within 24 hours. This exceeded the PBR standard of 93.7%. When water main break repairs approach 20 hours in duration EWSI provides additional communication to affected customers, and when required, provides temporary water supply support via water tanks, hose hook ups, or delivery of water jugs to affected customers.
- Water Loss Factor (ILI): In 2020, EWSI's Infrastructure Leak Index (ILI) of 0.84 exceeded the PBR standard.
- System Energy Efficiency Factor: The water distribution system energy efficiency performance decreased slightly in 2020, relative to 2019, due to the impact of the COVID-19 pandemic. The shift in both consumption and primary pressure zones from commercial and industrial areas to residential areas resulted in increased power consumption.

Despite the decrease in performance, EWSI implemented several energy efficiency improvements and GHG reductions, including:

- Completion of several building envelope energy efficiency enhancement projects; and
- Implementation of reservoir temperature control during non-occupied periods resulted in an 11% reduction in gas consumption (with heating and cooling degree days taken into account).

2021 Areas for Improvement

- Water Loss Factor (ILI): EWSI will continue to explore continuous improvement options to quantify and validate inputs and to identify and minimize water loss opportunities.
- System Energy Efficiency Factor: In 2021, EWSI has several key energy efficiency initiatives planned which will include:
 - Update the Water Canada Climate Change Adaptation Plan;
 - Continue with implementation of the office and reservoir off-hour temperature control program;
 and

 Continue to improve the building envelope energy efficiency programs to reduce GHG emissions.

2.5.4 Environment Index

The environmental index measures the success of programs and policies designed to mitigate and report adverse environmental impacts.

Table 2.5.4 Environmental Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index
Water Conservation Factor	The actual 10 year rolling average monthly Edmonton residential consumption per household.	<17.2	15.1	1.139
Environment Incident Factor	The number of reportable and preventable environmental incidents.	<6	6	1.000
Solids Residual Management Factor	The average number of days that the Rossdale and E.L. Smith water treatment plants are operating in direct filtration mode.	> 120	167.8	1.398
Average index				1.179
Index Standard Points				15.0
Total Actual Points				17.7
Maximum Available Points Including Bonus Points				16.5
Total Points Earned				

2020 Highlights

- Water Conservation Factor: As a result of people spending more time at home during the COVID-19 pandemic residential consumption per customer increased in 2020. Higher indoor residential consumption was partially offset by a reduction in seasonal consumption, as a result of higher than usual precipitation over the summer months. Despite the COVID-19 pandemic, the actual Water Conservation Factor was still well below the standard. This is attributable to historical and ongoing changes in water usage habits and technology improvements resulting in efficient appliances and toilets.
- **Environment Incident Management Factor:** There were a total of six reportable and preventable incidents in 2020. Several of the incidents were lab-based which correlated to sampling errors.
 - Root causes were identified for each incident, many pertained to management system issues such as inadequate communication or procedures. Subsequently, corrective actions were identified, assigned, and completed in a timely manner.
- Solids Residual Management Factor: In 2020, the water treatment plants successfully operated in
 direct filtration despite more challenging raw water conditions (e.g. higher colour) than have been
 experienced in the past. Both water treatment plants operated an average of 168 days in direct
 filtration relative to the target of 120 days. As a result, total solids discharged to the North
 Saskatchewan River during the winter months (January, February, November and December) were
 reduced by 43.3% relative to baseline conventional treatment and total solids reduction was 5.6% for
 the year.

2021 Areas for Improvement

• Water Conservation Factor: The impacts of COVID-19 pandemic have continued into 2021 with higher than usual residential consumption per customer. The duration of the COVID-19 impacts is uncertain, but changes in consumption patterns are likely to continue into at least the early part of the summer. The past two years have experienced colder and wetter than average summers, a more typical summer could result in a large increase in residential consumption for outdoor purposes such as lawn watering.

Apart from COVID-19, residential consumption per customer will continue to decline due to changes in technology and water conservation awareness. Renovations in older homes will see inefficient appliances and toilets replaced with more efficient ones and new homes will be built with high efficiency appliances and low flush toilets already in place.

- Environment Incident Management Factor: Ongoing focus for 2021 will be on reducing the number
 of reportable incidents by continuing to perform root causes analysis and timely implementation of
 corrective actions for significant environmental and public health incidents.
 - EWSI will also be implementing new consolidated Health, Safety, and Environment incident reporting and management guideline. This guideline is intended to help address management system issues identified in 2020.
- Solids Residual Management Factor: EWSI will continue to optimize chemical dosing and other
 operating strategies for direct filtration, with the goal being to minimize solids discharged to the North
 Saskatchewan River.

2.5.5 Safety Index

The safety index is a measure of the success of programs and the application of policies that maximizes the safety of employees and the public.

Table 2.5.5 Safety Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index
Near Miss Reporting Factor	The number of near miss reports entered in the ERS system.	>550	724	1.316
Work Site Inspections and Observations Factor	Number of Work Site Inspections and observations completed per year.	>1,032	3,140	3.043
Lost Time Frequency Factor	The actual lost time frequency rate.	<0.57	0.00	2.000
All Injury Frequency Factor	The actual all injury frequency rate	< 1.54	0.59	2.630
		Д	verage index	2.247
		Index Sta	andard Points	15.0
Total Actual Points				
Maximum Available Points Including Bonus Points				
		Total Po	oints Earned	16.5

2020 Highlights

- **Near Miss Reporting Factor:** Near miss and hazard identification reporting continued to be an effective means to proactively identify hazards and implement corrective actions to mitigate potential harm to employees, contractors and members of the public.
- Work Site Inspections / Observations Factor: Work site inspections and observations continued
 to be a successful leading indicator that provided leadership and employees the opportunity to
 engage in field activities, proactively identify areas of improvement, and verify conformance to EWSI
 standards.
- Lost Time Frequency Rate Factor: In 2020, EWSI exceeded the lost time frequency rate factor by having no lost time events.
- All Injury Frequency Rate Factor: In 2020, EWSI had 3 recordable incidents (Medical Treatment).
 Two were related to musculoskeletal strains and one was due to an abrasion.

2021 Areas for Improvement

- Near Miss Reporting Factor: With consideration of the ongoing impact of the COVID-19 pandemic, there will be a heighted focus on the reporting of near miss and hazard identification events throughout 2021. This ensures employees keep their mind on task and continue with proactive reporting to mitigate hazards before an event occurs.
- Work Site Inspections / Observations Factor: With consideration of the ongoing COVID-19
 pandemic, EWSI will monitor inspection and observation activities and look for opportunities to
 continue to conduct proactive field engagements.

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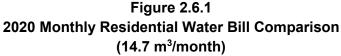
Lost Time Frequency Rate & All Injury Frequency Rate Factors: Water Canada has developed
risk profiles specific for water treatment plants and water distribution and transmission operations.
This will enable EWSI to identify top health and safety risks specific to work environments and
implement mitigating factors where possible. The objective will be to ensure effective and meaningful
controls are in place to reduce the potential for harm to employees, contractors, and the public.

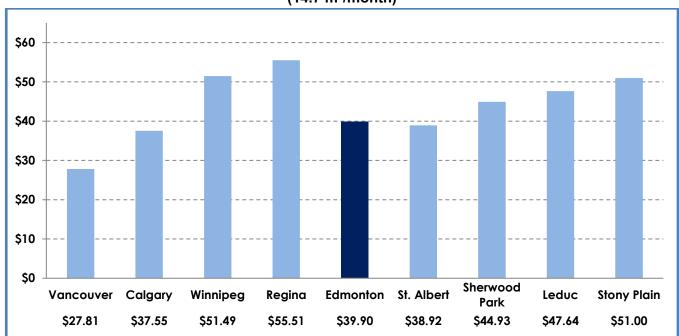
2.6 Rates and Bill Comparisons

Water bill comparisons for 2020 are based on the published water rates for Calgary, Vancouver, Winnipeg and Regina, as well as four local communities. These bill comparisons represent the total cost to the customer and include fixed charges, consumption charges and any other applicable surcharges.

2.6.1 Residential Water Bills

Figure 2.6.1 provides a comparison of residential household water bills for residential household consumption of 14.7 m³ per month, the average residential customer consumption per month in Edmonton in 2020. Comparison of residential water bills shows that Edmonton's water bills are competitive with all of the cities and local communities surveyed, except for Vancouver. This result is not unexpected. Vancouver has an excellent raw water source and, therefore, has lower needs for water treatment than Edmonton which has a naturally highly variable water source in the North Saskatchewan River.





2.6.2 Commercial Water Bills

Table 2.6.2 provides a comparison of the water bills for commercial customer of various sizes. This table shows that water bills for EWSI's commercial customers are competitive with all of the other surrounding communities and other major cities in western Canada, except for Vancouver.

Table 2.6.2
Commercial Monthly Water Bill Comparison
(\$ per month)

		Α	В	C	D
	Monthly Bill - \$ per month	Small	Medium	Large	Extra Large
1	Monthly Consumption - m ³	10	250	1,000	5,000
2	Vancouver	21.63	336.72	1,370	6,703
3	Calgary	43.10	379.98	1,565	7,668
4	Regina	45.90	545.70	2,321	10,940
5	Winnipeg	42.73	497.97	1,976	9,572
6	Edmonton	28.18	417.73	1,670	7,048
7	St. Albert	30.68	450.68	1,763	8,763
8	Sherwood Park	32.26	677.86	2,695	13,455
9	Stony Plain	34.67	866.78	3,467	17,336
10	Leduc	40.20	668.21	2,772	13,111

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3 Wastewater Treatment Services

3.1 Accomplishments and Challenges

In 2020, Wastewater's key accomplishments included:

- Completing an updated Edmonton Wastewater Treatment Integrated Resource Plan (the "IRP") following extensive public engagement from 2017 to 2019. The IRP documents the long term planning process for its wastewater treatment system considering: regulatory changes; technological advancements; changes in volume and characteristics of wastewater and stormwater flows; lifecycle replacement requirements for assets at Gold Bar WWTP and at the Clover Bar Biosolids Recovery Facility; climate change impacts; and EWSI's commitments to stakeholders. EWSI identifies the investments and operational activities that would be required under each of these scenarios, through evaluation of environmental and social impacts, operational, planning and infrastructure responses, risk assessment and management, financial analysis and community impacts. Each project proposed in the IRP is tested against the shared outcomes developed through public engagement processes. In some cases, shared outcomes can drive the pace of implementation of projects.
- Implementing cost controls and efficiency initiatives across all areas of Wastewater's operations, achieving savings in chemical costs from dosing optimization, in contractor costs following the dissolution of the Centre of Excellence, and in engineering costs by reducing the number of engineering studies. EWSI also found opportunities to utilize more internal personnel in certain capital maintenance and repair programs in place of contractors. These adjustments reduced operating expenses by increasing capitalization of internal labour costs and additional capitalized overheads. Finally, as noted above, corporate shared service cost allocations were reduced following the Drainage Services transfer.
- Making significant progress in identifying and rehabilitating deteriorating facilities and improving
 process performance and reliability at EWSI's wastewater treatment operations. Notwithstanding
 these successes, many operational and asset management challenges remain such as controlling
 odours, correcting deteriorating asset condition, and optimizing process performance, stability and
 reliability. EWSI plans to address these challenges in its capital and operating plans for the upcoming
 2022-2024 PBR term.
- Under its One Water Planning approach, initiating the Sanitary Integrated Resource Plan (SanIRP). Under the Sanitary IRP, EWSI will continue to develop strategies to maximize the capture of wet weather flow and diversion to Gold Bar WWTP for enhanced primary treatment and to reduce loadings of bacteria and solids to the North Saskatchewan River. The development of SanIRP will incorporate many synergy opportunities with other EWSI initiatives including SIRP. One of SIRP's initiatives is to promote the wide spread installation of Low Impact Development (LID) features. Installation of LID will reduce stormwater flows to the storm and combined sewer networks, and decrease the combined sewer flow to Gold Bar WWTP and the environment. A city wide performance matrix called Green Hectares has been adopted to track the installation of LID in Edmonton.

3.2 Customers and Consumption

Wastewater's customer counts, consumption and consumption per customer are similar to those of In-City Water. Differences in customer counts, almost entirely within the commercial customer class, are attributable to "water-only" customers who are not tied into the City's drainage system, such as businesses in industrial parks that are served by septic systems, as well as seasonal water customers, such as commercial lawn watering services and golf courses. Table 3.2 below provides a comparison of 2020 and 2017-2020 forecast to actual customer counts and consumption per customer.

Table 3.2
Wastewater Treatment Customers, Consumption and Consumption per Customer

		Α	В	С	D
		20	2020		-2020
	Customers and Consumption	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Customers				
2	Residential	271,073	272,428	263,585	266,445
3	Multi-Residential	3,883	3,779	3,814	3,769
4	Commercial	17,190	17,056	16,862	16,899
5	Total	292,146	293,263	284,261	287,113
6	Monthly Consumption per Customer				
7	Residential	13.9	14.7	14.3	14.4
8	Multi-Residential	408.8	407.1	408.8	396.4
9	Commercial	119.0	92.4	121.9	110.2
10	Annual Consumption - ML				
11	Residential	45,329.0	48,202.7	180,671.1	184,052.0
12	Multi-Residential	19,047.7	18,462.5	74,846.2	71,703.4
13	Commercial	24,537.3	18,920.9	98,624.0	89,404.9
14	Total	88,914.0	85,586.0	354,141.3	345,160.3

Actual to forecast differences in Wastewater's customer counts and consumption are attributable to the same factors discussed in Section 2.2.

3.3 Financial Performance

Wastewater's revenue requirements are summarized on Table 3.3 below.

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Table 3.3
Wastewater Treatment Revenue Requirements
(\$ millions)

		А	В	С	D
		20:	20	2017-2020	
	Summary of Revenue Requirements	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Wastewater Rate Revenue*	105.6	99.0	383.6	365.7
2	Wastewater Revenue Requirement				
3	Operating expenses	59.6	53.9	226.3	200.5
4	Other revenue	(7.1)	(6.4)	(26.5)	(25.7)
5	Depreciation and amortization	19.0	19.6	66.0	68.1
6	Return on rate base financed by debt	13.4	11.7	47.5	44.2
7	Return on rate base financed by equity	20.6	20.1	73.6	78.6
8	Wastewater Revenue Requirement*	105.6	99.0	386.9	365.7
9	Return on Rate Base Financed by Equity	10.18%	10.70%	10.18%	11.52%

^{*} In the PBR forecast, rebasing and other special rate adjustments have been smoothed over the PBR term. Therefore, although forecast revenue is equal to the revenue requirement over the 2017-2021 PBR term, in any year within the PBR term, forecast revenue may be greater or less than the revenue requirement

Detailed explanations for forecast to actual variances for each of the elements of the revenue requirement are provided in sections 3.3.1 to 3.3.6.

3.3.1 Revenue

Wastewater's rate revenues include fixed monthly services charges applied on a per connection basis, and consumption charges applied to each cubic metre of consumption. Besides rate revenues, Wastewater also has a relatively small amount of other revenue, about 60% of which relates to overstrength surcharges that are subject to the same rate adjustment mechanism as Wastewater's rate revenue. Table 3.3.1 below provides a comparison of Wastewater's 2020 actual and forecast revenue.

Table 3.3.1
Wastewater Treatment Revenue
(\$ millions)

		Α	В	С	D
		20	20	2017-2020	
	Wastewater Treatment Revenue	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Fixed Monthly Service Charges				
2	Residential	16.9	15.5	60.4	56.6
3	Multi-Residential	0.2	0.2	0.9	0.8
4	Commercial	1.1	1.0	3.9	3.6
5	Fixed Monthly Service Charges	18.3	16.7	65.1	61.0
6	Consumption Charges				
7	Residential	45.2	47.0	164.9	165.0
8	Multi-Residential	19.0	18.0	68.4	64.2
9	Commercial	23.1	17.3	85.2	75.5
10	Consumption Charges	87.3	82.3	318.4	304.7
11	Wastewater Rate Revenue	105.6	99.0	383.6	365.7
12	Other Revenue	7.1	6.4	26.5	25.7
13	Total Wastewater Treatment Revenue	112.6	105.4	410.1	391.4

Wastewater's revenues were \$6.6 million less than forecast in 2020, and \$17.9 million less than forecast over the 2017-2020 PBR period. This difference is attributable to three factors:

- Lower than forecast inflation resulted in \$2.5 million less revenue in 2020 than forecast (\$7.5 million lower than forecast for 2017-2020). Since rate increases are capped at inflation less the efficiency factor ("i-x"), lower than forecast inflation from 2016 to 2020 will continue to impact revenues throughout the remainder of the 2017-2021 PBR term;
- Lower than forecast consumption resulted in a \$3.0 million decrease in 2020 (\$8.0 million lower than forecast for 2017-2020). As with Water in 2020, commercial consumption was 22.9% lower than the PBR forecast primarily attributable to the COVID-19 pandemic. This is partially offset by higher than forecast residential consumption (6.3%); and
- The Non-Routine Adjustment related to the transfer of Drainage Services to EPCOR (see Section 1.5) has reduced revenues by \$1.1 million in 2020 relative to the forecast (\$3.0 million lower than forecast for 2017-2020).

3.3.2 Operating Expenses by Function

Wastewater's operating expenses are presented and analyzed on both functional and cost category bases. Actual and forecast operating expenses by function are shown in Table 3.3.2 below:

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Table 3.3.2
Wastewater Treatment Operating Expenses by Function
(\$ millions)

		Α	В	С	D
		2020		2017-2020	
	Function and Sub-function	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Power, Other Utilities and Chemicals				
2	Power and Other Utilities	5.6	5.2	21.6	19.9
3	Chemicals	1.7	1.3	6.5	4.8
4	Power, Other Utilities and Chemicals	7.2	6.5	28.1	24.6
5	Wastewater Treatment				
6	Wastewater Treatment Plant	20.3	18.1	76.6	70.3
7	Operations Support Services	8.5	6.5	32.9	25.7
8	Capitalized Overhead	(2.5)	(2.5)	(9.6)	(11.7)
9	Wastewater Treatment	26.3	22.1	99.9	84.3
10	Billing, Meters and Customer Service				
11	Billing and collections	3.6	3.8	13.5	13.5
12	Meter reading	2.5	2.4	9.6	9.3
13	Regulatory Services	1.0	1.5	4.0	5.3
14	Billing, Meters and Customer Service	7.1	7.8	27.2	28.2
15	EWSI Shared Services				
16	EWSI Shared Services	3.5	3.8	13.7	13.4
17	Incentive and Other Compensation	1.2	1.4	4.6	3.2
18	EWSI Shared Services	4.7	5.3	18.3	16.6
19	Corporate Shared Services	5.2	4.1	20.0	16.0
20	Franchise Fees and Property Taxes				
21	Franchise Fees	7.9	7.7	29.4	28.5
22	Property Taxes	1.2	0.6	3.7	2.3
23	Franchise Fees and Property Taxes	9.2	8.3	33.1	30.9
24	Total Operating Expenses by Function	59.7	54.0	226.5	200.7

Overall, Wastewater's operating expenses for 2020 were \$5.7 million less than forecast (\$25.8 million less for 2017-2020). Key factors contributing to this difference include:

- **Power and Other Utilities** \$0.4 million less than forecast in 2020, (\$1.7 million lower than forecast for 2017-2020), due to lower than forecast power prices.
- Chemicals \$0.4 million lower than forecast in 2020 (\$1.7 million lower than forecast for 2017-2020), primarily attributable to two factors. First, the Ostara nutrient removal facility was offline more than expected, resulting in lower chemical usage over the 2017 to 2020 period. Second, process and dosing optimization enabled Wastewater to achieve significant reductions in alum usage over the 2017 to 2020 period. These savings are expected to continue to be realized on an ongoing basis.
- Wastewater Treatment \$4.2 million lower than forecast in 2020 (\$15.6 million lower than forecast for 2017-2020). The variance is primarily attributable to adjustments to the capital program, where projects with a high component of contractor costs have been replaced by capital maintenance and repair projects completed by Wastewater personnel. These changes have led to capitalization of an additional \$0.6 million of internal labour costs that would otherwise have been expensed (\$5.8 million for 2017-2020) and additional capitalized overheads of \$0.1 million in 2020 (\$2.0 million for 2017-2020). Besides these changes, the variance also reflects lower than forecast fringe benefits costs of \$0.5 million in 2020 (\$2.4 million lower than forecast for 2017-2020) related to lower pension

contributions, and \$2.4 million in savings in contractor costs (\$3.9 million lower than forecast for 2017-2020) resulting from dissolution of the Centre for Excellence, lower maintenance costs, and the completion of fewer engineering studies in 2020. The remainder of the variance results from numerous small items, none of which are individually significant.

- EWSI Shared Services \$0.5 million higher than forecast in 2020 (\$1.7 million lower than forecast for 2017-2020). Higher than forecast costs in this category in 2020 reflects a \$0.3 million increase in business unit allocations (\$0.3 million lower than forecast for 2017-2020) and higher than forecast incentive compensation of \$0.2 million (\$0.6 million lower than forecast for 2017-2020). The 2017-2020 variance also includes \$0.8 million of savings in long term disability premiums, the remainder of the variance results from numerous small items, none of which are individually significant.
- Corporate Shared Services \$1.0 million less than forecast in 2020 (\$4.0 million less for 2017-2020). These differences reflect both the reduction in corporate cost allocations resulting from the transfer of Drainage from the City of Edmonton to EUI, as well as cost savings in corporate functions. As with In-City Water, the cost reductions arising from the transfer of Drainage Services have been returned to Wastewater customers through a Non-Routine Adjustment to 2018 wastewater rates which continues through to 2021.
- Franchise Fees and Property Taxes \$0.9 million less than forecast in 2020 (\$2.2 million less for 2017-2020). Lower than forecast revenue resulted in a \$0.3 million reduction in franchise fees in 2020 (\$0.9 million lower than forecast for 2017-2020). Lower than forecast property taxes relate to the deferral of capital projects, including the Operations Center at Mid-point Entrance project, which had been forecast to increase property taxes starting in 2018.

3.3.3 Operating Expenses by Cost Category

Table 3.3.3 shows operating expenses by cost category for Wastewater Treatment Plant Operations, Billing Meters and Customer Service, and EWSI Shared Services, where cost categories differ from the sub-functions in Section 3.3.2.

Table 3.3.3
Wastewater Treatment Operating Costs by Cost Category
(\$ millions)

		Α	В	С	D
		20	2020		2020
	Cost Category	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Wastewater Treatment Plant Operations				
2	Staff Costs and Employee Benefits	18.2	16.6	70.6	60.1
3	Contractors and Consultants	5.0	2.4	17.2	12.6
4	Materials and Supplies	2.1	1.9	8.1	8.5
5	Other	1.0	1.2	4.0	3.0
6	Wastewater Treatment Plant Operations Expenses	26.3	22.1	99.9	84.3
7	Billing, Meters and Customer Service				
8	CUS Charges	3.6	3.8	13.5	13.5
9	Contractors and Consultants	3.5	3.9	13.7	14.7
10	Billings, Meters and Customer Services Expenses	7.1	7.8	27.2	28.2
11	EWSI Shared Services				

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		Α	В	С	D
		2020		2017-2020	
	Cost Category	PBR		PBR	
		Forecast	Actual	Forecast	Actual
12	EWSI Shared Services Allocation	3.3	3.2	12.7	11.5
13	Staff Costs and Employee Benefits	1.3	1.8	5.1	4.6
14	Other	0.1	0.3	0.5	0.5
15	EWSI Shared Services Expenses	4.7	5.3	18.3	16.6

The information presented in this table supports the explanations of differences between 2020 actual and forecast expenses provided in Section 3.3.2. Accordingly, no additional explanations are considered necessary.

3.3.4 Depreciation and Amortization

Wastewater's depreciation expense and amortization of contributed assets for 2020 are shown in Tables 3.3.4 below:

Table 3.3.4
Wastewater Treatment Depreciation and Amortization
(\$ millions)

		Α	В	С	D
	Depreciation and Amortization		2020		-2020
				PBR	
		Forecast	Actual	Forecast	Actual
1	Gross depreciation expense	19.9	20.6	69.7	72.2
2	Amortization of contributions	(0.9)	(0.9)	(3.7)	(3.7)
3	Depreciation, net	19.0	19.6	66.0	68.5

Wastewater's 2020 depreciation expense was \$0.7 million greater than forecast (\$2.1 million greater for 2017-2020), even though plant in service was \$63.9 million (9%) less than forecast at December 31, 2020 (Table 3.3.5, line 6. This difference results from adjustments to Wastewater's capital program where asset replacement projects were replaced with capital maintenance and repair projects, which have higher effective depreciation rates than asset replacements. In the PBR forecast, depreciation expense was calculated as if all asset additions related to new assets, rather than repair or to overhauls of existing assets. EWSI expects that the effect of higher than forecast depreciation rates will continue through the remainder of the 2017-2021 PBR term.

3.3.5 Rate Base

Wastewater's 2020 mid-year rate base, shown in Table 3.3.5 below, was \$35.4 million less than forecast, reflecting lower than forecast capital additions over the 2016 to 2020 period resulting from project deferrals and other adjustments to the capital program described in Section 3.4.1.

Table 3.3.5
Wastewater Treatment Mid-Year Rate Base (\$ millions)

		Α	В
		202	20
		PBR	
	Components of Mid-Year Rate Base, net of Contributions	Forecast	Actual
1	Plant in Service		
2	Balance, beginning of year	686.6	631.7
3	Capital additions	59.2	52.4
4	Retirements and adjustments	-	(2.1)
5	Balance, end of year	745.8	681.9
6	Mid-Year Plant in service	716.2	656.8
7	Accumulated Depreciation		
8	Balance, beginning of year	186.1	163.0
9	Depreciation expense	19.9	20.6
10	Retirements and adjustments	-	(2.1)
11	Balance, end of year	206.0	181.4
12	Mid-Year Accumulated Depreciation	196.1	172.2
13	Other Rate Base Items		
14	Working Capital	6.6	6.4
15	Materials and Supplies	1.6	1.9
16	Gross Mid-Year Rate Base	528.3	492.9
17	Contributions		
18	Balance, beginning of year	41.0	41.0
19	Contributions in aid of construction	-	-
20	Balance, end of year	41.0	41.0
21	Mid-Year Contributions	41.0	41.0
22	Accumulated Amortization		
23	Balance, beginning of year	18.4	18.4
24	Amortization of contributions	0.9	0.9
25	Balance, end of year	19.3	19.3
26	Mid-Year Accumulated Amortization	18.9	18.9
27	Mid-Year Contributions	22.1	22.1
28	Mid-Year Rate Base	506.2	470.8

Unlike In-City Water, where contributions relate primarily to developer-funded assets, contributions included in Wastewater's rate base offset the cost of non-utility assets included in Wastewater's plant in service. This treatment ensures that the capital costs associated with these assets are not borne by utility rate payers. The cost of operating these assets, as well as any related revenues are also excluded from Wastewater's financial results.

3.3.6 Return on Rate Base

In 2020, Wastewater's return on equity was \$0.5 million lower than forecast and \$5.0 million greater for 2017-2020. Although, Wastewater achieved a lower than forecast net income, lower than forecast rate base resulted in a Wastewater earning a return on equity of 10.70% in 2020 (11.52% for 2017-2020). EWSI expects that operating cost savings (see section 3.3.2), and lower than forecast rate base will continue to offset any reductions in revenue and drive higher than forecast returns on equity for the remainder of the 2017-2021 PBR term.

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Table 3.3.6-1
Wastewater Treatment Return on Rate Base (\$ millions)

	•				
		202	20	2017-2020	
	Return on Rate Base	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Mid-year Rate Base	506.2	470.8		
2	Deemed Capital Structure				
3	Debt (%)	60.00%	60.00%		
4	Equity (%)	40.00%	40.00%		
5	Cost of Capital				
6	Cost of Debt	4.41%	4.14%	4.37%	4.32%
7	Cost of Equity	10.18%	10.70%	10.18%	11.52%
8	Weighted Average Cost of Capital (WACC)	6.72%	6.76%	6.69%	7.20%
9	Return on Mid-Year Rate Base				
10	Return on Rate Base Financed by Debt	13.4	11.7	47.5	44.2
11	Return on Rate Base Financed by Equity	20.6	20.1	73.6	78.6
12	Return on Mid-year Rate Base	34.0	31.8	121.1	122.8

Wastewater's weighted average cost of debt calculation are shown in Table 3.3.6-2 below. The lower than forecast embedded cost of debt is a result of both reduced issuances of new long-term debt in response to lower than forecast capital expenditures, and favorable economic conditions which allowed EWSI to issue the long term debt at lower than forecast rates over the 2017 to 2020 period.

Table 3.3.6-2
Wastewater Treatment Interest Expense and Cost of Debt (\$ millions)

		Α	В	С	D
		20	20	2017-2020	
	Interest Expense and Cost of Debt	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Interest Expense				
2	Interest on short-term debt	1.0	0.3	3.7	3.6
3	Interest on City of Edmonton debentures	2.5	-	11.8	6.2
4	Interest on intercompany debentures	10.2	11.6	33.3	35.3
5	Total Interest expense	13.7	12.0	48.8	45.0
6	Mid-year debt and other long-term liabilities				
7	Mid-Year Short-term debt	274.6	272.1		
8	Mid-Year Long-term debt	35.2	16.9		
9	Mid-Year Other Long-term liabilities	0.5	0.3		
10	Total Mid-year debt and other long-term liabilities	310.2	289.4		
11	Embedded cost of Debt	4.41%	4.14%	4.37%	4.31%

3.3.7 Transactions with Affiliates

Wastewater derives a significant proportion of its revenue and expenses from transactions with affiliates, including the City of Edmonton, EUI, and its subsidiaries, and other EPCOR Water Services Inc. business units. Table 3.3.7 summarizes Wastewater's transactions with affiliates.

Table 3.3.7
Wastewater Treatment Transactions with Affiliates (\$ millions)

		Α	В	С	D
		20	20	2017-	2020
	Affiliate and Service	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Revenues from the provision of services to the City of				
	Edmonton				
2	Wastewater Treatment Services	1.1	0.9	4.1	4.5
3	Other Services	0.2	1	0.9	0.3
4	Total	1.3	0.9	5.1	4.8
5	Services provided by (recovered from):				
6	City of Edmonton				
7	Franchise Fees	7.9	7.7	29.4	28.5
8	Property Taxes	1.2	0.6	3.7	2.3
9	Interest on Long Term Debt	2.5	-	11.8	6.2
10	Regulatory Services	1.0	-	4.0	0.7
11	Biosolids Contractor Service	-	0.5	-	5.1
12	Other Services	0.2	0.2	0.7	8.0
13	Total	12.9	9.0	49.6	43.6
14	EPCOR Utilities Inc.				
15	Corporate Shared Service Costs	5.2	4.1	20.0	16.0
16	Interest on Intercompany Loans	10.2	11.6	33.3	35.3
17	Interest on Short-term debt	1.0	0.3	3.7	3.6
18	Other Services	-	0.2	-	0.3
19	Total	16.3	16.3	57.0	54.9
20	EPCOR Distribution and Transmission Inc.				
21	Maintenance and other services	0.1	-	0.2	0.2
22	EPCOR Technologies Inc.				
23	Hydrovac Charges	-	-	-	0.3
24	EPCOR Energy Alberta LP				
25	Billing and Collection Services	3.2	3.1	12.2	11.7
26	Other EWSI Business Units				
27	EWSI Shared Services Allocation	3.3	3.2	12.7	11.5
28	Meter reading services from In-City Water	2.5	2.4	9.6	9.3
29	Water purchases from In-City Water	0.4	0.4	1.5	1.7
30	Regulatory services from Drainage Services	3.2	1.5	12.2	4.7
31	Project engineering recoveries from Drainage	-	-	-	(1.2)
32	Laboratory services recoveries from Drainage		(0.3)	-	(1.1)
33	Total	9.4	7.2	36.0	25.0
34					
	services provided by:				
35	City of Edmonton	-	0.1	-	0.1
36	EPCOR Technologies Inc.	-	0.1	-	0.3
37	EPCOR Utilities Inc.		0.0	-	0.3
38	Total	-	0.2	-	0.7

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3.4 Capital Programs

3.4.1 Capital Expenditures

Table 3.4.1 compares approved capital expenditures from the PBR forecast to actual capital expenditures for 2020 for each project with approved capital expenditures in excess of \$5.0 million over the 2017-2021 PBR term, as well as for each project category. Table 3.4.1 also provides a comparison of total 2017-2021 approved capital expenditures to EWSI's current capital forecast.

Water and Wastewater Treatment PBR 2017-2021

EPCOR Water Services Inc.

Table 3.4.1
Wastewater Treatment Capital Expenditures
(\$ millions)

		Α	В	С	A	В	С	D	Е	F	1
			2020			2017 to 2020			2017 to 2021	-	
		PBR			PBR			PBR	Current		1
		Forecast	Actual	Difference	Forecast	Actual	Difference	Forecast	Projection	Difference	
1	Reliability and Life Cycle Improvements										1
2	Build Pipe Racks	-	7.3	7.3	-	9.4	9.4	-	10.8	10.8	1
3	Replace 2.5km of Sludge Line	-	0.7	0.7	-	7.8	7.8	-	7.8	7.8	2
4	Clarifier Chain Replacement	0.6	0.9	0.2	3.4	8.0	4.6	4.1	9.4	5.3	3
5	Sludge Line Upgrades	-	0.1	0.1	3.4	8.0	4.7	3.4	8.0	4.7	4
6	Mechanical Rehab Program	2.7	2.9	0.3	13.9	18.2	4.2	15.6	20.1	4.5	5
7		3.5	4.3	0.8	13.9	17.8	3.8	17.6	21.4	3.8	6
8	Structural Rehab Program	1.6	1.4	(0.2)	6.1	7.0	1.0	7.7	11.5	3.8	7
9		-	2.7	`2.7	11.3	14.1	2.8	11.3	14.4	3.1	8
10	Distribution Chamber Reconstruction	_	0.0	0.0	3.8	6.8	3.0	3.8	6.8	3.0	9
11	Electrical Rehab Program	1.7	1.7	0.1	5.4	6.8	1.4	7.2	8.9	1.8	
12	Operations Center at Mid-Point Entrance	2.0	0.4	(1.6)	19.4	1.5	(17.9)	19.4	7.5	(11.9)	10
13	Digester 4 Upgrades	6.6	0.1	(6.5)	12.0	1.4	(10.6)	12.0	1.4	(10.6)	11
14	Headworks and Primary Aeration System Upgrades	_	0.1	0.1	6.7	1.4	(5.3)	6.7	1.4	(5.3)	12
15	Utility Hot Water System Rehabilitation	1.0	2.1	1.1	12.9	8.8	(4.0)	13.9	9.0	(4.9)	13
16		1.2	1.7	0.5	11.6	5.7	(5.8)	12.8	8.0	(4.7)	14
17		11.0	0.8	(10.1)	12.0	1.3	(10.7)	15.6	10.9	(4.7)	15
18	Site Ventilation Rehabilitation	9.0	4.2	(4.7)	29.7	18.4	(11.3)	31.5	29.9	(1.6)	
19		3.2	2.5	(0.7)	19.3	19.3	(0.0)	21.2	27.3	6.2	16
20	Subtotal	44.0	34.0	(10.0)	184.7	161.7	(23.0)	203.4	214.5	11.1	1
21	Performance Efficiency and Improvement			, ,			, ,				
22	Plant Improvements*	1.8	1.2	(0.6)	8.7	8.8	0.0	10.6	10.3	(0.2)	
23	Projects < \$5 million	1.3	1.2	(0.0)	6.0	4.5	(1.5)	7.0	5.5	(1.5)	
24	Subtotal	3.1	2.4	(0.7)	14.7	13.3	(1.4)	17.6	15.8	(1.8)	1
25	Growth/Customer Requirements			, ,			, ,			, ,	
26	Hydrovac Sanitary Grit Treatment Facility	-	0.1	0.1	8.4	7.3	(1.1)	8.4	7.6	(0.8)	
27	Projects < \$5 million	_	0.9	0.9	1.5	2.0	`0.4	1.5	2.1	` 0.6	
28	Subtotal	-	1.0	1.0	9.9	9.3	(0.6)	9.9	9.7	(0.3)	1
29							,			, ,	
30		0.6	0.4	(0.1)	3.9	2.1	(1.8)	4.5	5.5	1.0	
31	Regulatory			, ,			, ,				
32	Projects < \$5 million	_	1.3	1.3	-	1.3	1.3	-	2.8	2.8	17
33		47.7	39.2	(8.5)	213.3	187.7	(25.6)	235.4	248.3	12.9	1

^{*} Plant Improvements project is a consolidation of the individual plant improvements (\$2.9M), control system upgrades (\$1.0M), control system operational improvements program (\$2.6M), and instrumentation upgrades (\$4.1M) projects approved in the 2017 to 2021 PBR.

Explanations for differences between PBR forecast capital expenditures for 2017 to 2021 and EWSI's current projection in excess of \$2.0 million include:

- 1. Build Pipe Racks \$10.8 million (new project). This project provides for construction of an above-ground pipe rack network to allow the relocation of biogas piping, natural gas, glycol heating lines and electrical circuits out of underground tunnels at the Gold Bar WWTP. Moving these utilities above ground will reduce tunnel ventilation upgrade costs, enable future expansion of process piping, facilitate compliance with building and fire codes, and provide a safer working environment.
- 2. **Replace 2.5 km of Sludge lines** \$7.8 million (new project). This project provides for replacement of a 2.5 km section of the sludge line between the Clover Bar lagoons and the North Saskatchewan River. Upon inspection this section of the sludge line was found to be in such poor condition that repairs and/or rehabilitation was not financially viable and full replacement was required.
- 3. Clarifier Chain Replacement \$5.3 million (132%) greater than forecast. The costs of this project have increased significantly following the premature failure of stainless steel clarifier chains due to unexpected localized corrosion. These chains are being replaced with plastic loop chains, which have a better performance record at Gold Bar WWTP. These particular chains required earlier than scheduled rehabilitation given the criticality of continuously running the primary and secondary clarifiers, which is crucial to meeting regulatory requirements for final effluent quality from the Gold Bar WWTP
- 4. Sludge Line Upgrades \$4.7 million (138%) greater than forecast. The PBR forecast only included the costs of cleaning and inspecting the sludge lines between Gold Bar WWTP and the Clover Bar Lagoons. Inspections on older sections showed that the sludge lines were in poor condition and required significant additional capital expenditure under this project for rehabilitation/replacement to ensure that these pipelines could continue to operate with minimal risk of leakage.
- 5. **Mechanical Rehabilitation Program** \$4.5 million (29%) greater than forecast, reflecting expenditures on emergency repairs. The most significant repairs included repair of a leaking glycol heating line and mechanical rehabilitation of the secondary clarifiers, which were originally expected to last beyond the current PBR term.
- 6. **Structural Rehab Secondaries 1-8** \$3.8 million (22%) greater than forecast. The purpose of this program is to complete the structural rehabilitation of the secondary clarifiers and bioreactors at the rate of one clarifier and bioreactor rehabilitation per year. The increase in program spending is primarily due to updated cost estimates and a better understanding of the current condition of the clarifiers for the rehabilitation work performed to date.
- 7. **Structural Rehabilitation Program** \$3.8 million (50%) greater than forecast, primarily attributable to the costs of addressing greater than expected concrete deterioration at the Gold Bar Diversion Structure caused by long-term H₂S gas exposure. This increase has been partially offset by deferral of lower priority structural rehabilitation sub-projects.
- 8. **Digester 3 Upgrades** \$3.1 million (27%) greater than forecast. The increased project costs are primarily attributable to costs associated with addressing unanticipated structural integrity issues identified during construction, which resulted in increases to the project scope.
- 9. **Distribution Chamber Reconstruction** \$3.0 million (79%) greater than forecast. The increase in the forecast cost of this project results from higher than expected competitive bids from contractors,

PBR 2018-2022

EPCOR Water Services Inc.

- as well as higher than expected costs to demolish the distribution chamber and to construct the lift station tie-ins.
- 10. Operations Centre at Mid-Point Entrance \$11.9 million (61%) less than forecast. The reduction in project spending is reflective of design and scope adjustments that incorporate the results of public consultation, which also resulted in Gold Bar's recent commitment to complete all future construction within the existing footprint of the Gold Bar WWTP. In place of the Mid-Point Entrance project, to provide a new upgraded control room and the hygiene facilities necessary for maintenance workers within the existing footprint of the Gold Bar WWTP, there will be a renovation of the existing Centre of Excellence Building to house new control and hygiene facilities (Mid-Point Entrance Project) and the Maintenance Hygiene Project
- 11. **Digester 4 Upgrades** \$10.6 million (88%) less than forecast. EWSI completed an overall assessment of the solids loading to the Gold Bar WWTP. The assessment determined that Digester 4 upgrades were not required in the short term to meet treatment requirements. As such, EWSI was able to defer this project to the 2022-2024 PBR term to allow for the structural issues in Digester 3 to be addressed, and allow for prioritization of other higher priority wastewater plant projects that were required during the 2017-2021 PBR term.
- 12. **Headworks and Primary Aeration System Upgrades** \$5.3 million (79%) less than forecast, reflecting a reduction in the scope of this project following EWSI's determination that restoring aeration in the main influent channels was not required. This was because solids deposition rates in the primary influent channels at the Gold Bar WWTP had decreased due to recent upgrades of Grit Tanks 4/5 and Screens 7/8, and currently observed solids accumulation rates in the channels did not present operations and maintenance problems.
- 13. **Utility Hot Water System Rehabilitation** \$ 4.9 million (35%) less than forecast. The decrease in project spending is primarily attributable to the deferral of certain non-critical upgrades to future PBR periods. This allows these upgrades to be better coordinated with other upgrades to the heating system.
- 14. **Buildings and Site Rehabilitation Program** \$4.7 million (37%) less than forecast. The scope of this project was reduced following an internal review, which concluded that certain sub-projects could be safely deferred, allowing resources to be focused on unanticipated, higher-priority projects.
- 15. **Square 1 Gas Room Replacement** \$4.7 million (30%) less than forecast, reflecting scope and design changes that are expected to more efficiently resolve the identified process safety risks, at a lower total cost.
- 16. **Reliability and Life Cycle Improvements < \$5.0 million** \$6.2 million (29%) greater than forecast. The projected increase in this category results primarily from the purchase and installation of new onsite emergency back up power generation (\$2.0 million); unanticipated preliminary scope and design costs associated with a new Dewatering Facility (\$2.9 million); and increased electrical program spending due to a combination of unforeseen construction difficulties and the replacement of more electrical equipment than was initially estimated (\$1.8 million).
- 17. **Regulatory < \$5.0 million** \$2.8 million (100%) greater than forecast. The projected increase in this category results primarily from an Air Quality Monitoring Station project (\$1.6 million), which includes the installation of an air quality monitoring station between the Gold Bar WWTP and communities to the south of the plant. The monitoring station was added to Gold Bar WWTP's Approval to Operate

effective July 1, 2019 following collaborative discussions with AEP on reducing air quality impacts of the wastewater treatment process.

3.4.2 Construction Work in Progress

Wastewater's rate base consists of plant in service. If a capital project has not been completed (i.e. not placed into service) during the year, the capital expenditures on that project remain in Construction Work in Progress and are excluded from the rate base. The 2020 year-end balance of Wastewater's Construction Work in Progress is \$7.9 million greater than forecast, reflecting changes in the timing of project completion.

Table 3.4.2
Wastewater Treatment Construction Work in Progress
(\$ millions)

		Α	В	/ C	D	
	Construction Work in Progress		20	2017	7-2020	
				PBR		
		Forecast	Actual	Forecast	Actual	
1	Balance, beginning of period	24.3	33.8	19.2	22.6	
2	Capital Expenditures	47.7	39.2	213.3	187.8	
3	Capital Additions	(59.2)	(52.4)	(219.7)	(189.7)	
4	Balance, end of period	12.8	20.7	12.8	20.7	

The PBR plan allows EWSI to capitalize the costs of financing certain projects remaining in Construction Work in Progress, using AFUDC. In 2020, because of the higher average balance of Construction Work in Progress, AFUDC included in capital expenditures on eligible projects amounted to \$1.7 million, compared to the PBR forecast amount of \$1.3 million.

3.5 Operational Performance

3.5.1 Water Quality and Environmental Index

The Water Quality and Environmental index is a composite measure intended to assess EWSI's impact on the environment through the quality of the wastewater effluent returned back to the North Saskatchewan River and the effectiveness of environmental management programs.

Table 3.5.1
Water Quality and Environmental Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index	
Water Quality Factor	The value of the Wastewater Effluent Limit Performance, which aggregates measures of the percentage of the discharge limit for five parameters in the Gold Bar wastewater treatment plant's final effluent.	< 28.0%	19.0%	1.476	
Environmental Incident Factor	The actual number of environmental incidents that are both reportable and preventable	< 10	1	10.00	
		A	verage Index	5.738	
Index Standard Points					
Total Actual Points					
Maximum Available Points Including Bonus Points					
		Total Po	oints Earned	60.5	

2020 Highlights

- Wastewater Effluent Limit Performance Index: Maintenance efforts in previous years to repair and
 maintain chains and drive mechanisms resulted in increased availability of secondary clarifiers which
 in turn improved process operations. As a result, the 2020 WELPI was the lowest in the past five
 years.
- Environment Incident Management: In 2020, there were no reportable incidents related to treated wastewater effluent discharged to the North Saskatchewan River. However, there was one reportable environmental incident. The incident was a result of not meeting the daily average oxidation-reduction potential in the EPT scrubber for one day, which is a requirement under the EWSI's Wastewater Treatment Plant Approval to Operate. Enhanced monitoring and alarming, procedural updates, and training were added to existing processes to prevent reoccurrence of this issue.

2021 Areas for Improvement

- Wastewater Effluent Limit Performance Index: In 2021, there will be an increased focus on the
 use of "winter mode" for the secondary treatment process which involves increased aeration in the
 bioreactors. There will also be a continued focus on limiting unplanned downtime to maximize
 treatment levels.
- Environment Incident Management: Continued efforts to manage odour-related incidents with planned installation of an air quality monitoring station south of the Gold Bar plant in 2021. This will be in addition to the existing two air quality stations currently near the plant and the onsite monitoring system installed in 2020.

3.5.2 Customer Service Index

Wastewater's customer service index for the 2017-2021 PBR term includes three equally weighted odour metrics. These metrics recognize that Wastewater's customer interactions typically relate to odour concerns from customers located close to the Gold Bar Wastewater Treatment Plant.

Table 3.5.2
Customer Service Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index	
H ₂ S – 1 Hour Exceedance Factor	The number of hourly exceedances of the 1 hour limit averaged between Gold Bar and Beverly air quality monitoring stations.	< 6	1	6.000	
H ₂ S – 24 Hour Exceedance Factor	The number of hourly exceedances of the 24 hour limit averaged between Gold Bar and Beverly air quality monitoring stations.	< 2	0	2.000	
Scrubber Uptime Factor	The percentage of time that the scrubbers are on line.	> 90%	99.4	1.104	
		A	verage Index	3.035	
		Index Sta	andard Points	15.0	
Total Actual Points					
Maximum Available Points Including Bonus Points					
		Total Po	oints Earned	16.5	

2020 Highlights

- H₂S 1 and 24 Hour Exceedance Factor: There was one 1-hour H₂S exceedance in 2020. Continued fence line H₂S monitoring and newly installed odour monitoring software allowed Gold Bar operations to identify elevated levels of H₂S and avoid potential exceedances. Two new carbon scrubbers at the grit and screenings buildings were also commissioned which reduced the amount of H₂S emitted from those operational areas.
- **Scrubber Uptime Factor:** Redundancy installed in the scrubber systems in 2018, helped to increase the scrubber uptime in 2020. Additional focus has been placed on planning preventative and corrective maintenance activities to limit scrubber downtime.

2021 Areas for Improvement

- H₂S 1 and 24 Hour Exceedance Factor: Installation of a new air quality monitoring station south
 of the Gold Bar WWTP is planned for 2021.
- **Scrubber Uptime Factor:** The current preventative maintenance program will be continued to limit scrubber downtime. Construction of a new EPT scrubber with increased redundancy is planned to start in 2021.

3.5.3 System Reliability and Optimization Index

The system reliability and optimization index is a measure of the performance of the Gold Bar Wastewater Treatment Plant and the degree to which the wastewater treatment system is optimized to minimize its impact on the environment.

Table 3.5.3
System Reliability and Optimization Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index	
Enhanced Primary Treatment Factor	The percentage of time that the enhanced primary treatment facility ran during wet weather events where the influent flow rate exceeded the EPT event threshold.	> 80.0%	100.0%	1.250	
Biogas Utilization Factor	The percentage of biogas utilized, calculated as the volume of biogas produced less the volume flared divided by the volume produced.	> 60.0%	83.6%	1.393	
Energy Efficiency Factor	The energy used in all wastewater facilities in kWh divided by the volume of wastewater effluent that either receives ultraviolet (UV) treatment or is membrane plant effluent.	< 514	489	1.051	
		А	verage Index	1.231	
Index Standard Points					
Total Actual Points					
	Maximum Available Points Including Bonus Points				
		Total Po	oints Earned	16.5	

2020 Highlights

- Enhanced Primary Treatment (EPT) Factor: The EPT clarifiers were proactively cleaned and inspected in 2020. This minimized downtime and maximized availability for primary treatment.
- **Biogas Utilization Factor:** In 2020, heating requirements were slightly higher and overall biogas production was slightly lower than planned. However, due to optimization of boiler and flare operation the plant was still able to utilize more and flare less biogas than in previous years.
- **Energy Efficiency Factor:** Energy consumption in 2020 was average, but slightly higher effluent flow volumes resulted in a lower Energy Efficiency Factor, as compared to previous years.

2021 Areas for Improvement

- Enhanced Primary Treatment (EPT) Factor: Planning for proactive replacement of assets nearing end-of-life to minimize unplanned downtime will continue in 2021.
- **Biogas Utilization Factor:** Operations will continue to concentrate on maximizing biogas utilization by running as many boilers on biogas as possible before relying on natural gas.
- **Energy Efficiency Factor:** During 2021, there will be a focus on optimization of secondary aeration blower operation and a decrease in the use of a lag blower when not operationally necessary.

3.5.4 Safety Index

EPCOR and EWSI are committed to a safe, healthy lifestyle and demonstrate this through care and concern for people. The safety index is a measure of the success of programs and the application of policies that maximizes the safety of employees and the public

Table 3.5.4 Safety Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index			
Near Miss Reporting Factor	The number of near miss reports entered in the ERS system.	>220	199	0.905			
Work Site Inspection Factor	Work Site Inspection Number of Work Site Inspections and		1,015	1.104			
Lost Time Frequency Factor	The actual lost time frequency rate.	<0.75	0.00	2.000			
All Injury Frequency Factor	The actual all injury frequency rate	<1.50	0.64	2.328			
		Α	verage Index	1.584			
	Index Standard Points						
Total Actual Points							
	Maximum Available Points Including Bonus Points						
		Total Po	oints Earned	16.5			

2020 Highlights

- Near Miss Reporting Factor: With consideration to the impact of COVID-19 pandemic, near miss
 reporting was slightly lower than past years. However, even with the slight decrease in reporting,
 near miss and hazard identification reporting continued to be an effective means to proactively identify
 hazards and implement corrective actions to mitigate potential harm to employees, contractors and
 members of the public.
- Work Site Inspections / Observations Factor: Work site inspections and observations continued
 to be a successful leading indicator that provided leadership and employees the opportunity to
 engage in field activities, proactively identify areas of improvement, and verify conformance to EWSI
 standards.
- Lost Time Frequency Rate Factor: In 2020, Gold Bar exceeded the lost time frequency rate factor by having no lost time events.
- **All Injury Frequency Rate Factor:** In 2020, Gold Bar recorded 1 recordable incident (Medical Treatment) when a worker suffered a burn to their wrist while performing calibration duties.

2021 Areas for Improvement

 Near Miss Reporting Factor. With consideration of the ongoing impact of the COVID-19 pandemic, there will be a heighted focus on the reporting of near miss and hazard identification events throughout 2021 to ensure employees keep their mind on task and continue with proactive reporting to mitigate hazards before an event occurs.

Work Site Inspections / Observations Factor. With consideration of the ongoing COVID-19
pandemic, EWSI will monitor inspection and observation activities and look for opportunities to
continue to conduct proactive field engagements.

Lost Time Frequency Rate & All Injury Frequency Rate Factors. Water Canada has developed
risk profiles specific for wastewater treatment plants. This will enable EWSI to identify top health and
safety risks specific to work environments and to implement mitigating factors where possible. The
objective will be to ensure effective and meaningful controls are in place to reduce the potential for
harm to employees, contractors, and the public.

3.6 Rates and Bill Comparisons

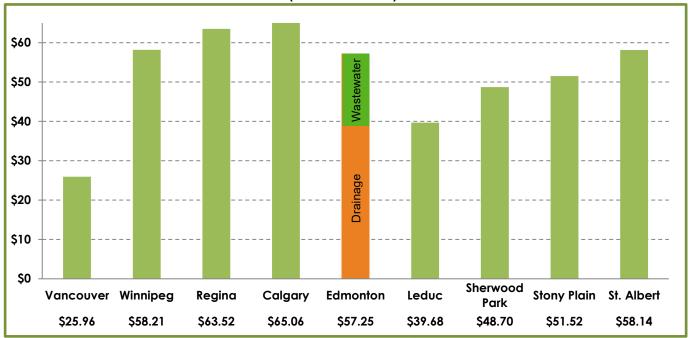
EWSI's wastewater (combined wastewater treatment, sanitary and stormwater) bill comparisons for 2020 are based on the published sanitary and stormwater rates for Calgary, Vancouver, Winnipeg and Regina, as well as four local communities. These bill comparisons represent the total cost to the customer and include fixed charges, consumption charges and any other applicable surcharges.

Unlike most cities, where wastewater treatment services and drainage services are combined, EWSI's Wastewater Treatment operations is only responsible for wastewater treatment and the operations and maintenance of sanitary, storm and combined sewer systems are provided through EPCOR Drainage Services. Accordingly, wastewater bill comparisons are based on the EWSI's combined wastewater treatment bill and its sanitary and stormwater bills.

3.6.1 Residential Wastewater Bills

Figure 3.6.1 provides a comparison of residential household wastewater bills for residential household consumption of 14.7 m³ per month, the average residential customer consumption per month in Edmonton in 2020.

Figure 3.6.1 2020 Monthly Residential Wastewater Bill Comparison (14.7 m³/month)



Unlike water services which are relatively consistent among cities and communities, the nature and extent of wastewater treatment and drainage services vary significantly between cities and communities due to differences in wastewater treatment processes, the inclusion of certain services in property taxes, and geographic and climatic factors which affect the level of investment in and approach to flood mitigation and stormwater services. In particular, stormwater charges are often included as a component of taxes.

Edmonton's \$57.25 average monthly bill from Figure 3.6.1 includes Wastewater charges of \$19.30 and Drainage charges of \$37.95 (inclusive of both sanitary and storm charges). While the total bill is higher than Vancouver, it is lower than Calgary and Regina, the two cities where drainage and wastewater treatment are most comparable to Edmonton. EWSI notes that cities across Canada are experiencing increased risk of flooding related to climate change and that substantial investments are needed to assess and address climate change-related flood mitigation.

Table 3.6.2 2020 Monthly Commercial Wastewater Bill Comparison (\$ per month)

		Α	В	С	D
	Monthly Bill - \$ per month	Small	Medium	Large	Extra Large
1	Monthly Consumption - m ³	10	250	1,000	5,000
2	Vancouver	20.37	305.32	1,244	6,075
3	Calgary	60.72	474.61	1,768	8,666
4	Regina	55.00	497.20	2,062	9,795
5	Winnipeg	44.98	736.25	2,878	14,185
6	Edmonton	47.77	563.77	2,303	11,490
7	St. Albert	76.36	522.76	1,918	9,358
8	Sherwood Park	40.08	479.28	1,852	9,172
9	Stony Plain	64.84	734.44	2,831	13,991
10	Leduc	31.30	458.50	1,794	8,914

4 Drainage Services

4.1 Accomplishments and Challenges

In 2020, Drainage Services significant accomplishments included:

1) Achieving Operating Efficiencies

EPCOR's commitments to the City of Edmonton included the realization of a 1% savings per year in operating costs, or approximately \$5.9 million of savings in 2022. Between 2018 and 2020, Drainage undertook key initiatives to ensure that it is able to achieve this level of savings, including:

- Building synergies across EWSI Operational functions, including Private Development and Inspection Services, One Water Planning, Quality Assurance and Environment, Customer Analytics, Procurement, Inventory Management, and Operational Excellence have been combined with Water Services, providing efficiencies in the delivery of these functions across Water, Wastewater Treatment and Drainage;
- Reducing contractor and consultant costs Drainage decreased the use of contractors and consultants and increased the use of internal resources to provide services that had previously been provided by contractors or consultants, such as inspections, engineering and design work, and environmental consultation and assessment;
- Reducing lost time incidents Drainage has successfully implemented EPCOR's Health & Safety Management System within Drainage. Between 2018 and 2020, there were seven lost time incidents in Drainage, compared to 42 lost time incidents in the four years prior to the transfer. Not only did Drainage achieve a 79% reduction in total injuries, but incident severity was also reduced by 75%. Besides reducing the direct costs of medical leave for injured employees and overtime for replacement workers, WCB rebates have increased as a result of Drainage's improved safety;
- Optimizing shift scheduling Drainage has identified and implemented three opportunities to reduce overtime through shift scheduling: adopting improved work schedules in System Control; establishing a dedicated trouble response crew; and improving scheduling during spring run-off;
- Strengthening financial controls over cost recoveries Drainage has implemented EPCOR
 processes to ensure the completeness, accuracy and timeliness of collection of claims for third
 party damages, and recovery of the costs of service locates; and
- Increasing fleet fuel efficiency Drainage has improved fleet fuel efficiency since the transfer by
 replacing older vehicles with newer more fuel-efficient vehicles and with the implementation of
 telematics which will also reduce vehicle maintenance costs. Telematics has been implemented
 very recently and we expect to realize additional efficiencies in future years from this
 implementation.

2) Commencing work on SIRP

Drainage commenced work on executing its comprehensive SIRP strategy in 2020. This twenty year strategy is based on a risk methodology aligned with the City of Edmonton's Climate Change Adaptation and Resilience Strategy. The SIRP strategy has been very well received and, through Drainage's efforts, Edmonton's rating from the Intact Centre on Climate Adaptation on its flood mitigation plans has increased from "C" to "B+"². This rating is expected to improve as work is completed.

SIRP is also expected to provide major savings in capital costs. SIRP's estimated capital cost of \$1.6 billion over twenty years provides direct savings of between \$0.6 billion to \$2.9 billion relative to the 2017 City Wide Flood Mitigation Plan, far surpassing EWSI's commitment to achieving a 10% capital cost saving on the City's 10-year plan.

3) Commencing work on CORe

Drainage also commenced work on CORe, its other major strategic initiative. Unlike previous odour mitigation plans that focused on the controlled release of hydrogen sulphide (H₂S) gas which is extremely odourous and corrosive, the CORe strategy focuses on preventing or minimizing the formation of H₂S gas, which will reduce community odour impacts and lengthen the life of sewer network assets. Work has begun on both the capital and operating components of this plan, and costs for continuing this work are included in the Drainage's 2022-2024 PBR Application.

4) Implementing Capital Efficiency Initiatives

Between 2018 and 2020, Drainage implemented capital cost efficiency initiatives, including:

- The use of internal engineering resources to reduce engineering and design costs for routine projects. Prior to the transfer to EPCOR, engineering and project management costs comprised 15% to 20% of the total capital project budgets in Drainage Services. By relying on its standard processes and GIS-based design tools, EWSI has achieved a reduction in engineering and project management costs to 5% of the cost of routine projects.
- The use of Master Service Agreements and improved procurement processes to reduce costs;
- Completion of Project Management Methodology Review and procurement process improvements to generate efficiencies;
- Reducing crew sizes, resulting in completing the same quantity of work with significantly fewer resources. While this change has been implemented recently without any layoffs and is still being refined, it is anticipated that it will result in significant labour cost reductions for work performed by internal resources; and
- Utilizing central dispatch of shared tandem trucks, rather than having one truck per crew. This
 reduces the amount of time that tandem trucks sit idle and significantly reduced the number of
 contract tandem trucks that have needed to be hired. While this change has been implemented

² https://www.intactcentreclimateadaptation.ca/wp-content/uploads/2021/02/16-Cities-Flood-Preparedness.pdf

recently and is still being refined, an immediate reduction in the overall cost of tandem trucks was observed initially after implementing this change.

These initiatives, as well as other smaller initiatives to improve capital project management, are expected to result in more significant capital cost savings over time as these initiatives are fully implemented across Drainage Services. These initiatives on their own are expected to contribute significantly to achieving the 10% capital cost savings commitment. When combined with SIRP savings that are approximately triple the promised savings, the total capital efficiencies are far in excess of the level committed to prior to the transition.

Other accomplishments are detailed in Drainages' 2020 Operating Plan review in section 5.2.

4.2 Customers and Consumption

Drainage provides sanitary services to the same customers served by Wastewater Treatment, while Drainage storm customer's charges are based on land size and other factors. Therefore, actual customer counts, consumption per customer and total consumption are the same as those of Wastewater Treatment and actual to forecast differences in Drainage's customer counts and consumption are attributable to the same factors.

4.3 Financial Performance

As explained in Appendix A.2, the drainage rates set out in Bylaw 18100 reflect EWSI's commitment to limit average annual rate increases to 3% over the period from January 1, 2018 to March 31, 2022. Therefore, there is no City of Edmonton-approved PBR forecast to serve as the basis of comparison for financial performance. Instead, as in 2018 and 2019, Drainage's 2018 EPCOR drainage budget, adjusted to incorporate annual revenue increases of 3% and annual operating expense increases of 2%, serves as a proxy for a PBR forecast, providing a basis for assessing actual financial performance.

Drainage's revenue requirements are summarized on Table 4.3 below. Explanations of forecast to actual variances are provided in sections 4.3.1 to 4.3.6.

Table 4.3

Drainage Revenue Requirements
(\$ millions)

		Α	В	С	D
	Summary of Revenue Requirements		20	2018-	2020
			Actual	Budget	Actual
1	Drainage Rate Revenue				
2	Sanitary utility revenue	133.2	131.0	388.0	376.5
3	Stormwater utility revenue	66.6	75.4	194.0	204.7
4	Drainage Rate Revenue	199.8	206.3	582.0	581.3
5	Drainage Revenue Requirement				
6	Operating expenses	121.0	124.8	350.1	352.2
7	Other revenue	(8.8)	(8.0)	(25.5)	(26.7)
8	Depreciation and amortization	35.3	36.2	98.3	100.9
9	Return on rate base financed by debt	33.1	23.1	82.4	64.9

			В	С	D
	Summary of Revenue Requirements		2020		-2020
			Actual	Budget	Actual
10	Return on rate base financed by equity	19.1	30.3	76.7	89.9
11	Drainage Revenue Requirement	199.8	206.3	582.0	581.3
12	Return on Rate Base Financed by Equity	3.25%	4.95%	4.46%	5.03%

4.3.1 Revenue

Drainage's rate revenues are derived from both sanitary utility and stormwater utility services. Sanitary utility revenues are comprised of variable monthly charges based on monthly metered water consumption and flat monthly service charges based on the meter size. Stormwater utility revenues are based on area, development intensity, and run-off coefficients based on the zoning of individual land parcels. Rates for both sanitary and stormwater utility services from January 1, 2018 to March 31, 2022 are prescribed in Bylaw 18100 and incorporate an average annual rate increase of 3%.

Table 4.3.1 below provides a comparison of 2020 and 2018-2020 Drainage revenues to the budget:

Table 4.3.1
Drainage Revenue
(\$ millions)

	(ψ minions)							
		A	В	С	D			
	Drainaga Bayanya	20	020	2018	3-2020			
	Drainage Revenue	Budget	Actual	Budget	Actual			
1	Sanitary Utility							
2	Flat Monthly Service Charges							
3	Residential	37.6	33.9	109.7	97.3			
4	Multi-Residential	0.5	2.3	1.6	6.5			
5	Commercial (including large wholesale)	2.8	5.7	8.2	16.6			
6	Flat Monthly Service Charges	41.0	41.9	119.5	120.4			
7	Variable Monthly Charges							
8	Residential	48.0	50.9	139.9	139.5			
9	Multi-Residential	18.8	19.4	54.8	54.0			
10	Commercial	24.1	17.7	70.2	59.2			
11	Large wholesale	1.3	1.1	3.7	3.4			
12	Variable Monthly Charges	92.2	89.1	268.6	256.1			
13	Sanitary Utility Revenue	133.2	131.0	388.0	376.5			
14	Stormwater Utility							
15	Residential	35.1	40.4	102.3	110.3			
16	Multi-Residential	3.4	4.3	10.0	11.7			
17	Commercial	28.1	30.7	81.7	82.7			
18		66.6	75.4	194.0	204.8			
19	Drainage Rate Revenue	199.8	206.3	582.0	581.3			
20	Other Revenue	8.8	8.0	25.5	26.7			
21	Total Drainage Revenue	208.5	214.3	607.5	607.9			

In 2020, Drainage's rate revenues were \$6.5 million greater than budget and \$0.7 million less than budget for 2018-2020. Higher than budget revenues included \$7.4 million in revenues related to non-routine adjustments, including \$3.2 million for CORe, \$3.2 million for SIRP and \$0.8 million for LRT relocations. Without the NRAs, revenues would have been \$0.8 million less than budget because of lower than

forecast consumption. The COVID-19 pandemic shifted consumption from the commercial customer class to the residential and multi-residential customer classes. Even so, Drainage experienced an overall decrease in consumption because of business closures. Besides rate revenues, Drainage has Other Revenue derived from biosolids management services provided to the Alberta Capital Region Wastewater Commission, application and connection fees, wastewater transfer station services, late payment fees, miscellaneous fees pursuant to third party agreements, and other incidental services. The variance in these revenues is largely attributable to biosolids, where lower than planned activity and lower processed volumes resulting from the composter outage, resulted in lower than budget revenue.

4.3.2 Operating Expenses by Function

Table 4.3.2 below compares Drainage's 2020 actual operating expenses to its budget:

Table 4.3.2
Operating Expenses by Function
(\$ millions)

	(\$ minoris)							
		A B		С	D			
	Function	2020		2018-2020				
	runction	Budget	Actual	Budget	Actual			
1	Drainage Operations							
2	Maintenance	31.3	31.0	89.4	82.2			
3	Biosolids	17.0	15.6	49.7	49.5			
4	Monitoring and Compliance	4.3	3.8	13.2	12.4			
5	Other	0.5	0.6	3.2	3.8			
6	Drainage Operations	53.1	51.0	155.4	148.0			
7	Planning and Project Support							
8	Planning	10.4	6.0	32.9	23.1			
9	Project Support	5.2	8.9	10.5	21.0			
10	NRA – SIRP	-	2.6	-	2.6			
11	NRA - CORe	-	0.5	ı	0.5			
12	Planning and Project Support	15.6	18.0	43.4	47.2			
13	Billing and Meter Reading							
14	Meter Reading	6.7	6.8	19.1	19.5			
15	CUS Charges	0.6	1.4	1.6	3.4			
16	Billing and Meter Reading	7.3	8.2	20.8	22.9			
17	Drainage Services Administration							
18	Drainage Shared Services	15.7	15.2	44.4	45.3			
19	Incentive and Other Compensation	2.2	4.4	6.4	8.1			
20	Drainage Services Administration	17.9	19.6	50.8	53.4			
21	Corporate Shared Services	16.6	17.4	48.6	50.4			
22	Franchise Fees and Property Taxes							
23	Franchise Fees	9.5	9.7	29.1	27.9			
24	Property Taxes	1.1	0.9	2.1	2.6			
25	Franchise Fees and Property Taxes	10.6	10.6	31.1	30.5			
26	Total Operating Expenses by Function	121.0	124.8	350.1	352.2			

Total operating expenses for 2020 were \$3.8 million greater than budget (\$2.1 million greater for 2018-2020). Key factors contributing to this difference include:

• **Biosolids** - \$1.4 million less than budget (\$0.2 million less for 2018-2020). This function includes the storage and management of biosolids generated by the Gold Bar and Alberta Capital Regional

wastewater treatment plants. As in 2019, lower than budgeted expenses are primarily attributable to lower than planned activity and lower processed volumes resulting from the composter outage.

- Monitoring and compliance \$0.5 less than budget (\$0.8 million less for 2018-2020). Lower than budget expenses reflect lower than anticipated contractor costs of \$0.3 million (\$0.4 million for 2018-2020), lower staff costs of \$0.1 million (\$0.3 million for 2018-2020) and capitalization of a higher portion of labour costs of \$0.1 million (\$0.1 million for 2018-2020).
- Planning \$4.4 million less than budget (\$9.8 million less for 2018-2020). This function includes infrastructure, system and administration planning. Lower than budget expenses reflect lower than anticipated contractor costs of \$2.3 million (\$5.5 million for 2018-2020), capitalization of a higher than anticipated portion of staff costs of \$0.3 million (\$1.4 million for 2018-2020), savings of \$0.5 million (\$0.5 million for 2018-2020) related to the transfer of the customer services function to Water (now recovered through CUS charges), and lower staff costs net of vacancy factor of \$1.3 million (\$1.3 million for 2018-2020). The 2018-2020 variance also includes savings of \$0.9 million related to the transfer of lot grading inspection services back to the City of Edmonton in 2018. The lot grading inspection cost savings were offset with a proportionate decrease in associated revenues.
- Project Support \$3.7 million greater than budget (\$10.5 million greater for 2018-2020). This function includes surveying and engineering (conceptual, preliminary design or detailed design), project management, in-house construction, and emergency repairs. Higher than budgeted expenses include: \$3.1 million of additional salary costs (\$10.2 million for 2018-2020) related to design and construction work that had originally been budgeted as capital expenditures; and \$0.6 million of higher than anticipated contractor costs (\$1.8 million for 2018-2020), primarily related to project management. The 2018-2020 variance also includes \$1.5 million of cost recoveries resulting from higher equipment utilization in operations in 2018.

This category of costs illustrates the impact of the differences in accounting treatment between the City of Edmonton and EPCOR. Specifically, the PBR budget was prepared using City of Edmonton's Drainage's capitalization policies, which included capitalizing preliminary design costs (i.e. the costs incurred before there was a specific project). The actual results reflect EWSI capitalization policies, where most preliminary design costs are expensed, and where additional costs – capital overhead, higher salary burden, major inspections, abandonments, etc., are capitalized.

- NRAs for SIRP and CORe \$2.6 million for SIRP and \$0.5 million for CORe. In 2020. EWSI commenced work on these programs following approval for NRAs on December 2, 2019. Additional information on these NRAs is provided in section 1.5.
- **Billing and Meter Reading** \$0.9 million greater than budget (\$2.1 million greater for 2018-2020. Higher than budgeted expenses include metering and customer service support costs from EPCOR Energy Services, customer service costs transferred to Water (see Planning above), and unbudgeted call centre support costs from the City of Edmonton.
- Corporate Shared Services \$0.8 million greater than budget (\$1.8 million greater for 2018-2020).
 Higher than budgeted expenses reflect growth in assets and revenue, which are key corporate cost allocators, and increases in corporate IT costs charged directly to Drainage.
- **Drainage Shared Services** \$0.5 million less than budget (\$0.9 million more for 2018-2020). Lower than budgeted costs in 2020 and higher than budgeted costs for the 2018-2020 reflect organizational

changes in almost all administrative functions. These changes are primarily related to Drainage transition and integration.

- Incentive and Other Compensation \$2.2 million greater than budget (\$1.7 million greater for 2018-2020). Higher than budgeted expenses include \$0.7 million of incentive compensation (\$0.3 million less for 2018-2020) and year-end payroll adjustments of \$1.5 million related to long-term disability. The 2018-2020 variance also includes \$0.5 million in adjustments to corporate benefits and a WCB refund of \$0.1 million.
- Franchise Fees and Property Taxes (\$0.6 million less for 2018-2020). As with Water and Wastewater, lower than forecast franchise fees reflect lower than forecast revenues. This is partially offset by higher property taxes, which were not included in the budget as no accurate cost estimate was available at the time of budget preparation.

Variances in other operating expense functions and sub-functions are not significant, either individually or in aggregate.

4.3.3 Operating Expenses by Cost Category

Table 4.3.3 below shows operating expenses by cost category for Drainage Operations, Planning, Project Support Costs and Drainage Services Administration, where cost categories differ from the sub-functions in Section 4.3.2.

Table 4.3.3
Operating Expenses by Cost Category
(\$ millions)

	(*	A	В	С	D
		2020		2018-2020	
Cost Category		Budget	Actual	Budget	Actual
1	Drainage Operations		7101001		710101
2	Staff Costs and Employee Benefits	26.8	25.9	76.8	75.3
3	Contractors and Consultants	21.6	19.8	62.1	56.1
4	Materials and Supplies	0.2	-	0.6	0.3
5	Other	4.4	5.2	15.9	16.2
6	Drainage Operations	53.1	51.0	155.4	148.0
7	Planning and Project Support				
8	Staff Costs and Employee Benefits	10.5	13.9	29.0	39.2
9	Contractors and Consultants	4.5	3.2	15.1	10.4
10	Other	0.6	0.9	(0.7)	(2.4)
11	Planning and Project Support	15.6	18.0	43.4	47.2
12	Drainage Shared Services				
13	Staff Costs and Employee Benefits	12.2	14.2	34.2	35.9
14	Contractors and Consultants	5.2	4.1	14.8	12.6
15	Other	0.4	1.4	1.7	4.9
16	Drainage Shared Services	17.9	19.6	50.8	53.4

The information presented in this table supports the explanations of differences between 2020 actual and budget expenses provided in Section 4.3.2. Accordingly, no additional explanations are considered necessary.

4.3.4 Depreciation and Amortization

Drainage's depreciation expense and amortization of contributed assets for 2020 are shown in Table 4.3.4 below:

Table 4.3.4
Depreciation and Amortization
(\$ millions)

		Α	В	С	D
Denveciation and Amoutination		2020		2018-2020	
	Depreciation and Amortization	Budget	Actual	Budget	Actual
1	Provision for depreciation	76.6	78.7	213.1	221.2
2	Amortization of contributions	(41.3)	(42.5)	(114.7)	(120.3)
3	Depreciation, net	35.3	36.2	98.3	100.9

Drainage's net depreciation expense is \$0.9 million greater than budget (\$2.6 million greater for 2018-2020). These differences reflect higher than budget asset additions resulting from the changes to Drainage's capital program discussed in Section 4.4. The 2018-2020 difference also includes a \$1.5 million variance related to changes in depreciation rates in 2018. At the time the 2018 budget was prepared, Drainage had not completely finalized asset componentization and other adjustments needed for its regulated accounting. As a result, during 2018, Drainage found that actual depreciation rates, averaging 1.5%, were slightly higher than the average budget rate of 1.4%, resulting in higher-than-budgeted deprecation expense in 2018. The revised rates are reflected in the budget amounts for 2020 and future years.

4.3.5 Rate Base

Drainage's mid-year rate base, shown in Table 4.3.5 below, is \$8.0 million less than forecast. This difference is almost entirely due to the changes in the capital program discussed in in Section 4.4.1. These changes have resulted in lower capital additions in 2018 and 2019, and much higher capital additions in 2020, due to reprioritization of capital projects to address urgent needs for emergency repairs and asset rehabilitation, consolidation of flood mitigation under SIRP and work on approved NRA programs (CORe and LRT Relocations).

Table 4.3.5
Mid-Year Rate Base
(\$ millions)

		Α	В		
	Mid-Year Rate Base	2020			
	WIG-Teal Rate Dase	Budget	Actual		
1	Plant in Service				
2	Balance, beginning of year	4,912.7	5,010.1		
3	Additions - EPCOR-funded	144.1	211.9		
4	Additions - Contributed	131.1	151.9		
5	Retirements and adjustments	(12.8)	(7.1)		
6	Balance, end of year	5,175.1	5,366.8		
7	Mid-Year Plant in service	5,043.9	5,188.4		
8	Accumulated Depreciation				
9	Balance, beginning of year	990.2	987.9		

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PBR 2018-2022

EPCOR Water Services Inc.

	В				
	Mid-Year Rate Base	2020			
	Wilu-Teal Rate Dase	Budget	Actual		
10	Depreciation expense	76.6	78.7		
11	Retirements and adjustments	(12.8)	(7.0)		
12	Balance, end of year	1,054.0	1,059.6		
13	Mid-Year Accumulated Depreciation	1,022.1	1,023.8		
14	Other Rate Base Items				
15	Working Capital	15.7	15.8		
16	Materials and Supplies	1.5	1.5		
17	Other Rate Base Items	17.2	17.3		
18	Gross Mid-Year Rate Base	4,039.0	4,182.0		
29	Contributions				
20	Balance, beginning of year	(3,142.9)	(3,289.2)		
21	Contributions in aid of construction	(131.1)	(151.9)		
22	Balance, end of year	(3,274.1)	(3,441.1)		
23	Mid-Year Contributions	(3,208.5)	(3,365.2)		
24	Accumulated Amortization				
25	Balance, beginning of year	(532.8)	(537.0)		
26	Amortization of contributions	(41.3)	(42.5)		
27	Balance, end of year	(574.1)	(579.6)		
28	Mid-Year Accumulated Amortization	(553.5)	(558.3)		
39	Mid-Year Contributions	(2,655.1)	(2,806.9)		
30	Net Mid-Year Rate Base	1,383.9	1,375.2		

Even with significant changes to the capital program, in 2020, the mid-year rate base is less than 1% less than budget. Contributed assets continue to affect both the gross rate base and mid-year contributions. As noted in prior years', the value of contributed assets is difficult to forecast since developers are responsible for construction of distribution infrastructure in new subdivisions and the pace of construction can vary significantly. As well, EWSI receives contribution funding from the Sanitary Servicing Strategy Fund (SSSF) to support drainage development throughout the City of Edmonton. The amount of SSSF funding also varies significantly in response to the level of developer activity on SSSF-eligible projects.

4.3.6 Return on Rate Base

In 2020, Drainage's total return on rate base is \$0.8 million greater than budget (\$4.2 million less for 2018-2020). Although the total return on the rate base is close to budget, debt returns are lower than budget and equity returns are higher. In 2019 and 2020, EUI provided one-time preferential financing to Drainage in the form of short term notes at rates of 2.31% and 1.75%, respectively. This debt, which will be rolled over to higher cost debt prior in 2021 and 2022, reduces the average cost of debt by 1.13% in 2020 and 0.61% over the 2018-2020 period. The low cost of debt has enabled Drainage to earn equity returns in 2020 in excess of its budgeted returns. Even so, since Drainage's rates of return on equity are much lower than the returns approved for Water and Wastewater Treatment, the 2022-2024 PBR application proposes to ramp-up Drainage's rate of return on equity to comparable rates over a five year period commending in 2022.

Table 4.3.6-1
Return on Mid-Year Rate Base (\$ millions)

		Α	В	С	D
Return on Rate Base		2020		2018-2020	
		Budget	Actual	Budget	Actual
1	Net Mid-Year Rate Base	1,383.9	1,375.2		
2	Capital Structure				
3	Debt	57.50%	55.53%		
4	Equity	42.50%	44.47%		
5	Total	100.00%	100.00%		
6	Cost Rates				
7	Debt	4.16%	3.03%	3.91%	3.30%
8	Equity	3.25%	4.95%	4.46%	5.03%
9	Weighted Average Cost of Capital (WACC)	3.77%	3.88%	4.16%	4.13%
10	Return on Rate Base				
11	Debt	33.1	23.1	82.4	64.9
12	Equity	19.1	30.3	76.7	89.9
13	Total Return on Drainage Rate Base	52.2	53.4	159.1	154.8

Returns on rate base are calculated separately for the debt-financed and equity-financed portions of Drainage's net rate base. The rate of return on debt for 2020 and 2018-2020 reflects the "rollover" of City of Edmonton debentures into EUI notes with the same terms and conditions, as well as the preferential financing on short-term notes issued to EUI in 2019 and 2020. The calculation of the average cost of debt is shown in Table 4.3.6-2 below.

Table 4.3.6-2
Interest Expense and Cost of Debt
(\$ millions)

		Α	В	С	D
Interest Expense and Cost of Debt		2020		2018-2020	
		Budget	Actual	Budget	Actual
1	Interest expense				
2	Interest on short-term debt	1.3	1.5	5.2	3.6
3	Interest on City of Edmonton debentures	18.0	-	39.1	18.1
4	Interest on intercompany debentures	7.1	22.1	26.0	43.9
5	Total interest expense	26.4	23.5	70.2	65.7
6	Mid-year debt				
7	Mid-Year Short-term debt	34.6	47.2		
8	Mid-Year Long-term debt	599.3	731.0		
9	Total mid-year debt	633.9	778.2		
10	Average Cost of Debt	4.16%	3.03%	3.91%	3.30%

4.3.7 Transactions with Affiliates

Drainage derives a portion of its revenues and expenses from transactions with affiliates, including the City of Edmonton, EUI and its subsidiaries. Table 4.3.7 provides a summary of Drainage's 2020 and 2018-2020 transactions with affiliates.

Table 4.3.7
Transactions with Affiliates
(\$ millions)

	(,,	Α	В	С	D
		20		2018-	
	Affiliate and Service		Actual	Budget	Actual
1	Revenues from the provision of services to the City of	_		-	
	Edmonton				
2	Utility Services	2.9	2.9	8.7	5.8
3	Other Revenue	0.9	0.1	2.7	3.5
4	Total	3.8	2.9	11.4	9.3
5	Services provided by (recovered from):				
6	City of Edmonton				
7	Franchise Fees	9.5	9.7	29.1	27.9
8	Property Taxes	1.1	0.9	2.1	2.6
9	Interest on City of Edmonton debentures	18.0	- ,	39.1	18.1
10	Other services	7.8	5.0	23.5	25.0
11	Total	36.4	15.6	93.7	73.6
12	EPCOR Utilities Inc.				
13	Corporate Shared Service Costs	16.9	17.7	49.5	51.3
14	Interest on short-term debt	7.1	22.1	26.0	43.9
15	Interest on intercompany debentures	1.3	1.5	5.2	3.7
16	Total	25.3	41.2	80.7	98.9
17	Other Affiliates				
18	EPCOR Energy Alberta LP	3.9	4.9	11.7	13.2
19	EPCOR Distribution and Transmission Inc.	0.9	-	2.7	0.9
20	EPCOR Technologies Inc.	-	-	-	(0.2)
21	EPCOR Commercial Services Inc.	-	-	-	0.7
22	Other EWSI Business Units	2.0	1.6	6.0	6.6
23	Total	6.8	6.6	20.4	21.1
24	Expenditures (Contributions) on capital projects arising				
	from services provided by:				
25	City of Edmonton	(43.1)	(23.4)	(119.2)	(60.3)
26	EPCOR Technologies Inc.	-	5.2	-	12.6
27	EPCOR Utilities Inc.	2.3	1.3	5.2	4.2
28	EPCOR Energy Services	(2.2)	(2.7)	(7.6)	(8.1)
29	EPCOR Distribution and Transmission Inc.	-	0.0	-	0.4
30	EPCOR Water Services Inc.	0.2	0.3	0.6	0.7
31	Total	(42.9)	(19.2)	(121.1)	(50.4)

4.4 Capital Programs

4.4.1 Capital Expenditures

Drainage's forecast capital program is based on the 2018-2021 long term plan (LTP) included in Grant Thornton report CR_8300, an independent third party report assessing the transition of Drainage from the City of Edmonton to EPCOR. Drainage's 2020 capital expenditures program is summarized in Table 4.4.1 below. Table 4.4.1 provides a comparison of forecast to actual capital expenditures for 2020 and 2018 to 2020 for each program and for each project with capital expenditures in excess of \$10.0 million over the 2018-2021 term, as well as a comparison of total forecast capital expenditures for 2018 to 2021 from the LTP, adjusted for approved Non-Routine Adjustments, to EWSI's current capital projection.

Please note that forecast capital expenditures also include capital expenditures approved for Non-routine Adjustments.

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Table 4.4.1
Capital Expenditures and Contributions
(\$ millions)

				(\$ millio	110)						_
		Α	В	С	D	Е	F	G	Н	l l	
			2020			2018-20	20		2018 - 2021		
	Project Description	Forecast	Actual	Difference	Forecast	Actual	Difference	LTP	Projection	Difference	<u>Note</u>
1	Capital Expenditures										
2	Drainage Neighbourhood Renewal	43.8	36.6	(7.2)	124.1	87.2	(36.9)	175.8	123.0	(52.8)	1
3	Drainage System Expansion	20.4	24.9	4.6	57.3	67.8	10.5	84.2	93.1	8.9	2(a)
4	Drainage System Rehabilitation										
5	Groat Rd Trunk S OP-001639-01	-	13.2	13.2	-	34.5	34.5	-	34.5	34.5	3(a)
6	High Priority Replacement Program	13.7	18.6	4.9	40.0	53.0	13.0	54.2	70.6	16.5	3(b)
7	Projects under \$15 million	16.5	34.1	17.6	48.0	84.2	36.1	65.0	115.4	50.3	3(c)
8	Drainage System Rehabilitation	30.2	65.9	35.7	88.1	171.7	83.6	119.2	220.5	101.3	
9	Environmental Quality Enhancement										
10	Kinnard OSS	-	2.3	2.3	-	2.5	2.5	-	12.7	12.7	
11	Projects under \$15 million	33.7	14.7	(19.0)	74.7	26.1	(48.6)	100.8	33.1	(67.7)	
12	Environmental Quality Enhance	33.7	17.0	(16.7)	74.7	28.6	(46.1)	100.8	45.8	(55.0)	4
13	Flood Mitigation										
14	Tweddle Place OP-001334-01	9.1	5.4	(3.7)	29.6	14.5	(15.1)	29.6	20.5	(9.1)	5(b)
15	Malcolm Twed & Ed OP-001695-01	17.5	2.2	(15.3)	48.6	4.0	(44.7)	58.4	9.5	(48.9)	5(a)
16	Kenilworth Dry Pond	-	0.5	0.5	-	0.6	0.6	-	6.4	6.4	5(b)
17	Lauderdale West Dry Pond	-	-	/ -	-	-	-	-	0.8	0.8	5(b)
18	Projects under \$15 million	40.8	25.5	(15.3)	108.7	43.3	(65.4)	159.5	71.7	(87.8)	5(b)
19	Flood Mitigation	67.5	33.7	(33.8)	186.9	62.4	(124.5)	247.5	108.9	(138.6)]
20	SSSF Projects										
21	SESS SW4 OP-001336-01	-	5.4	5.4	-	17.6	17.6	-	20.6	20.6	
22	NEST NC2 & NC3 OP-001795-01	-	5.8	5.8	-	23.6	23.6	-	32.6	32.6	
23	SESS SA10A CP-002993-01	- ,	15.4	15.4	-	28.6	28.6	-	38.5	38.5	
24	SW5	-	0.3	0.3	-	0.3	0.3	-	4.5	4.5	
25	Projects under \$15 million	43.3	0.8	(42.5)	102.9	3.1	(99.8)	137.8	4.8	(133.0)	
26	SSSF Projects	43.3	27.8	(15.5)	102.9	73.2	(29.7)	137.8	101.0	(36.8)	6
27	NRA - LRT										
28	West Valley LRT	11.8	10.6	(1.2)	13.9	16.4	2.4	55.4	48.4	(7.1)	
29	Metro LRT	4.8	7.1	2.4	4.8	7.3	2.5	5.5	8.7	3.2	
30	NRA-LRT Projects	16.5	17.7	1.2	18.7	23.7	5.0	60.9	57.0	(3.8)	7
31	NRA - CORe					_					
32	151S/99A SanTrunk OP-001940-01	-	7.6	7.6	-	8.7	8.7	<u>-</u>	24.6	24.6	
33	Duggan Tunnel Replacement	1.0	0.8	(0.2)	2.1	0.8	(1.3)	10.4	5.2	(5.1)	
34	Mill Creek Combined	-	0.7	0.7	-	0.7	0.7	-	1.4	1.4	
35	Projects under \$15 million	14.6	21.7	7.1	19.6	29.2	9.7	41.9	64.3	22.4	

PBR 2018-2022

EPCOR Water Services Inc.

		Α	В	С	D	Е	F	G	Н]
			2020			2018-20	20		2018 - 2021	1	
	Project Description	Forecast	Actual	Difference	Forecast	Actual	Difference	LTP	Projection	Difference	<u>Note</u>
36	NRA - CORe	15.6	30.7	15.1	21.7	39.4	17.8	52.2	95.5	43.2	8
37	Real Estate	-	18.8	18.8	-	18.8	18.8		32.8	32.8	9
38	Total Capital Expenditures	238.9	273.1	34.3	633.9	572.7	(61.2)	865.4	877.6	12.2	
39	Contributions										
40	Drainage System Expansion	(12.2)	(4.0)	8.2	(43.9)	(16.3)	27.5	(60.1)	(21.6)	38.5	2(b)
41	Flood Mitigation										
42	Malcolm Twed & Ed OP-001695-01	-	(1.8)	(1.8)	-	(1.8)	(1.8)	-	(3.0)	(3.0)	
43	Projects under \$15 million	-	(5.0)	(5.0)	-	(5.0)	(5.0)	-	(11.5)	(11.5)	
44	Flood Mitigation	-	(6.8)	(6.8)	-	(6.8)	(6.8)	-	(14.5)	(14.5)	5(c)
45	SSSF										
46	SESS SW4 OP-001336-01	-	(5.4)	(5.4)	-	(17.6)	(17.6)	-	(20.6)	(20.6)	
47	NEST NC2 & NC3 OP-001795-01	-	(5.8)	(5.8)	-	(23.6)	(23.6)	-	(32.6)	(32.6)	
48	SESS SA10A CP-002993-01	-	(15.4)	(15.4)	-	(28.7)	(28.7)	-	(38.5)	(38.5)	
49	SW5	-	(0.3)	(0.3)	-	(0.3)	(0.3)	-	(4.5)	(4.5)	
50	Projects under \$15 million	(43.3)	0.7	44.0	(102.9)	2.6	105.5	(137.8)	2.3	140.1	
51	SSSF Projects	(43.3)	(26.2)	17.0	(102.9)	(67.7)	35.2	(137.8)	(94.0)	43.9	6
52	Total Contributions	(55.4)	(37.0)	18.4	(146.8)	(90.8)	55.9	(197.9)	(130.1)	67.8	
53	Capital Expenditures, Net	215.5	236.1	20.6	527.5	481.9	(45.6)	780.6	747.5	(33.1)	

Table 4.4.1 shows that despite the challenges posed by the COVID-19 pandemic, Drainage undertook an extensive capital program in 2020. Both actual and projected expenditures differ significantly from the LTP as Drainage (1) focused its resources on addressing critical needs for drainage system rehabilitation that had not been identified in the LTP; (2) re-evaluated flood mitigation projects in line with SIRP strategy; and (3) undertook capital projects to address needs identified in Non-Routine Adjustments approved for CORe and LRT relocations.

Explanations for significant differences between the LTP and Drainage's current projections for 2018 to 2021 are as follows:

- 1. Drainage Neighbourhood Renewal –2018-2021 \$52.8 million less than LTP. This category includes the costs of neighbourhood drainage asset renewals and is aligned with the timing of the City of Edmonton's Building Great Neighbourhoods program. The underspend compared to the LTP reflects a reduction in sewer upgrading costs based on reprioritization to more efficiently complete this work by including it into individual neighbourhood renewal projects where required or by using lower cost SIRP Strategy options such as capturing peak stormwater volumes at the source by using green infrastructure (LID and dry ponds) or by proactive relining of pipes and manholes to reduce inflow and infiltration.
- 2. **Drainage System Expansion, net of contributions** 2018-2021 \$47.4 million greater than LTP.
 - a. Capital expenditures –2018-2021- \$8.9 million greater than LTP plan. Increases in 2018-2021 projected expenditures in this partially-contributed program are primarily due to higher service connection costs reflecting increases in non-standard connections and capitalization of the costs of private development construction project services provided by City of Edmonton staff.
 - b. Contributions 2018-2022 \$38.5 million less than LTP. These decreases are primarily attributable to the removal of contributions from local improvement fees following the Drainage transfer.
- 3. **Drainage System Rehabilitation Projects** 2018-2020 \$101.3 million greater than LTP.
 - a. **Groat Road Storm Trunk Rehabilitation** 2018-2021 \$34.5 million greater than LTP. This project, completed in 2020, was originally planned to be complete prior to Drainage transfer but due to project complexity, design took longer than expected.
 - b. **High Priority Replacement Program** 2018-2021 \$16.5 million greater than LTP. The additional costs in this program result from asset inspections, which identified higher than anticipated volumes of assets meeting criteria for high priority replacement.
 - c. **Drainage System Rehabilitation Projects < \$15 Million** 2018-2021 \$50.3 million greater than LTP. Increases in the costs of these projects are primarily due to the large number of emergency projects requiring immediate rehabilitation. This also reflects the increased need for rehabilitation of aging drainage infrastructure resulting in increased scope on the local sewer

rehabilitation program to include catch basin leads and service connections as well as the new manhole catch basin program and proactive service relining project.

- 4. Environmental Quality Enhancement 2018-2021 \$55 million less than LTP. This category includes projects that mitigate the impacts of the drainage system on the environment, including sewer overflows, river loading, and reuse of biosolids. Actual and projected expenditures in this category have been reduced significantly due to the cancellation of the River for Life, Mill Creek End of Pipe Facility and Enhanced Biosolids projects as part of the re-prioritization of environmental projects within the SIRP strategy. The SIRP strategy has incorporated these environmental quality objectives.
- 5. Flood Mitigation, net of contributions 2018-2021 \$153.1 million less than LTP.
 - a. **Malcolm Tweddle and Edith Rogers Dry Ponds** 2018-2021 \$48.9 million less than LTP. Expenditures on this multi-year project have been deferred first due to delays in finalizing land agreement in 2019, then from weather-related pauses in construction in both 2019 and 2020 and delays on the City's LRT construction which impacted sewer installations
 - b. Other Flood Mitigation Projects \$89.7 million less than LTP. This category includes development of drainage infrastructure and program improvements to decrease flood risks. As described in Section 1.5, Drainage has consolidated management of flood mitigation projects under SIRP. The projected underspend is consistent with 2018 and 2019 reporting and reflects re-evaluation of flood projects in line with the SIRP strategy combined with delays in land acquisition in accordance with the City of Edmonton's new City consultative process.
 - c. Flood Mitigation Contributions 2018-2021 \$14.5 million greater than LTP. These contributions represent provincial and federal grant funding in respect of flood mitigation projects. Separate presentation of these contributions, rather than netting the grants against the related project reflects a change in the treatment of grant recoveries following the transfer of dry pond structure ownership to Drainage.
- 6. Sanitary Servicing Strategy Fund (SSSF) Projects, net of contributions \$7.0 million greater than LTP. The SSSF provides for developer financing of major sanitary trunk construction to service new development areas. Drainage works with the SSSF Management Committee to coordinate design, construction, schedules and budgets for various projects. While significantly less than the City LTP amounts, Drainage's current projected expenditures, align with the SSSF Management Committee's five year construction plan (2018-2022) to support orderly, cost-effective development. The major projects in this category fully funded through the SSSF. The unfunded amounts represent EWSI's annual contributions to the SSSF.
- 7. NRA-LRT Relocations 2018-2021 \$3.8 million less than NRA approval. Projected capital expenditures for these projects represent EWSI's current estimates of capital required in the 2018-2021 PBR term for NRAs approved by City Council. Projected capital expenditures for 2018-2021 are less than the amount approved by City Council, primarily due to rescheduling to align with the latest City plans on the West Valley LRT.

8. NRA-CORe – 2018-2021 – \$43.2 million greater than NRA approval. Actual and forecast costs for these programs represent EWSI's current estimates of capital required in the 2018-2021 PBR term for NRAs approved by City Council. Projected capital expenditures of \$95.5 million are \$43.3 million greater than the \$52.2 approved by City Council for 2018-2021. This increase is primarily due to inclusion of the large trunk program in CORe which was previously included under Drainage System Rehabilitation. The rehabilitation of large sanitary trunks are needed to address corrosion and odour issues.

9. Real Estate Consolidation Project (new project) - 2018-2021 - \$32.8 million. Following the transfer of Drainage to EPCOR, an EPCOR-wide real estate review was undertaken to identify and evaluate alternatives for consolidating Water Distribution and Transmission and Drainage's operations and maximize the contribution to the cost reduction and efficiency commitments made as part for the Drainage transfer. This project consolidates the many physical locations occupied by Water and Drainage and will provide operational cost-savings which are reflected in the 2022-2024 PBR. Projected expenditures are supported by a comprehensive business case submitted with Drainage's 2022-2024 PBR Application.

4.4.2 Construction Work in Progress

Drainage's rate base consists of plant in service. If a capital project is not completed (i.e. not placed into service) in the year, the capital expenditures on that project remain in Construction Work in Progress and are excluded from the rate base. Because of the long time frames required to complete large, complex projects, Drainage has larger balances of Construction Work in Progress than Water or Wastewater. Drainage's construction work in progress is summarized in Table 4.4.2 below:

Table 4.4.2
Construction Work in Progress
(\$ millions)

		Α	В
	County votion Work in Drowner		020
	Construction Work in Progress	Budget	Actual
1	Balance, beginning of year	66.2	46.9
2	Capital expenditures	236.1	237.5
3	Cancelled costs/Write-offs	-	(1.4)
4	Capital additions	(144.1)	(212.0)
5	Balance, end of year	145.9	71.0

The PBR allows Drainage to capitalize the costs of financing certain projects remaining in Construction Work in Progress, using an allowance for funds utilized during construction (AFUDC). In 2020, AFUDC included in capital expenditures on eligible projects amounted to \$3.0 million (\$2.1 million in 2019 and \$1.7 million in 2018).

4.5 Operational Performance

On February 19, 2020, City Council approved amendments to Bylaw 18100. These amendments provide for the introduction of new PBR performance metrics, scoring and penalties beginning in 2020. The new

proposed PBR metrics program is effective for the remainder of the PBR term (2020 and 2021), and is patterned after the water and wastewater PBR metrics and meets the requirements of the Letter of Intent developed for the transition of Drainage Services from the City to EPCOR.

4.5.1 Environmental Index

The environmental index measures the success of Drainage's programs and policies designed to mitigate and report adverse environmental impacts.

				Actual		
	Index Component	PBR Performance Measure	Standard	Score	Index	
1	Stormwater Flow and	The percentage of storm drainage	>63.0%	65.3%	1.037	
	Flow Monitoring	area monitored.	00.070	00.070	1.007	
2	Environment Incident	The actual number of reportable	<50 34		1.471	
	Management	environmental incidents.	\	34	1.471	
3	Green Hectares	Number of hectares with runoff	>22.0	18.0	0.817	
		managed by green infrastructure.	722.0	10.0	0.617	
			Aver	age Index	1.108	
	Index Standard Points					
	Total Actual Points					
	Maximum Available Including Bonus Points					
	Total Points Earned					

2020 Highlights:

Stormwater Flow and Flow Monitoring

Completed design of six new permanent outfall monitoring stations for construction in 2021

Environment Incident Management

- Achieved a 30% reduction in reportable incidents through organizational improvements, including
 assigning responsibility for investigating and identifying third party generators of spills and
 releases to Drainage's Monitoring and Compliance team.
- Recovered over \$39 thousand from customers following implementation of a new third party cost recovery process for spills and releases.

2021 Areas for Improvement

• Green Hectares

• In 2020, Drainage developed new design and construction standards for Low Impact Development projects and completed LID and small storage projects on public property in four neighbourhoods and along Jasper Avenue. Achieving performance standards will require implementation of LIDs on private lands, as well as on public property. To this end, Drainage has developed a Master Servicing Agreement for LID design and is working with the City of Edmonton and local businesses to expedite LID facility design and construction in 2021. Drainage has also established a partnership with University of Alberta to construct LID facilities on University land.

4.5.2 Customer Service Index

The Customer Service Index is a composite measure of the customers' perception of satisfaction with EWSI service, the speed of response and quality service level to customer issues.

				Actual	
	Index Component	PBR Performance Measure	Standard	Score	Index
1	Service Maintenance	The percentage of service			
	Calls	maintenance calls resolved within	>80.0%	97.2%	1.215
		24 hours.			
2	Emergency Dig Ups -	The percentage emergency dig			
	Service Restored	ups services resorted within 48	>98.0%	95.8%	0.978
		hours from time received from	290.076	93.070	0.976
		operations.			
3	Service Connections	The percentage of service			
		connection meeting the 6 week	>85.0%	71.7%	0.844
		target.			
4	Sewer Odour	The percentage of the city area	<16.7%	13.5%	1.234
	Hotspots	with odour hotspots.	10.7 /6	13.576	1.234
			Aver	age Index	1.038
Index Standard Points					
Total Actual Points					
		Maximum Available			22.0
			Total Point	s Earned	21.4

2020 Highlights:

Service Maintenance Calls

 Despite the challenges of performing work in private residences during the COVID-19 pandemic, Drainage's achieved better than standard performance, primarily due to process improvements including enhanced customer screening, and training to ensure the continued safe delivery of services.

Sewer Odour Hotspots

- Air monitoring was completed at 56 sewer locations across the city. This effort has provided a
 comprehensive understanding of odour in the sewer system and has guided the development of
 the permanent monitoring plan.
- Manhole sealing and sewer ventilation controls were successfully installed in key intersections of the Duggan and Steinhauer communities to limit sewer odour at historically high complaint locations.
- Twelve access manholes were built in the communities of West Jasper Place, Strathcona and Brookside, allowing for the inspection and identification of odour sources in several deep trunks for the first time.

2021 Areas for Improvement

Service Maintenance Calls

Additional technical training, customer service training, and specialized equipment will be
provided to Service Maintenance crews, so that crews will be able to perform all required work
during the initial call to the customer's property, reducing rework and customer inconvenience.

Emergency Dig Ups – Service Restored

- Although the standard was not met, in 2020, the average restoration time for the 45 of 47 services
 restored within the 48 hour performance standard was 14 hours and the average restoration time
 for all 47 services was 21 hours.
- Fro 2021, Drainage is continuing to work towards achieving performance targets. Average service reconnection time to April 30 is 11 hours.

Service Connections

- In 2020, Drainage completed new service installations at 228 locations with over 450 actual new services installed.
- For 2021, Drainage will be implementing process improvements to meet or exceed service connection targets. These improvement will incorporate the review and updating customer application guidelines to address constructability, operational and safety issues, as well as concerns identified through forums with developer representative groups.

• Sewer Odour Hotspots

- Drainage is continuing to implement its CORe strategy. In 2021, Drainage will install sixteen
 permanent air monitoring sites at locations across the city with a history of high public odour
 complaints. These sites will be integrated with SIRP Dashboard to allow planners and operators
 to see odour conditions in real time, both to pre-emptively manage odour issues in high impact
 areas, and that the evaluate the effectiveness of mitigation activities.
- In 2021, the CORe program will also include: capital upgrades at six pump stations to decrease the generation of hydrogen sulfide from those facilities and reduce odour in their downstream communities; construction of o sewer modifications in Allendale to reduce the presence of odour in the community; and deep trunk inspections and cleaning.

4.5.3 Reliability and Optimization Index

The System Reliability Index is a measure of the confidence that customer can place in the reliability of the drainage sanitary and stormwater systems.

	Index Component	PBR Performance Measure	Standard	Actual Score	Index	
1	Blocked Sewers	The number of blocked sewers per 100km of sanitary/combined pipe.	<2.10	2.51	0.838	
2	Sewer Renewal	The km of sewers renewed / relined.	>60.0	75.3	1.255	
3	Infrastructure Condition Rating – Min Level	The percentage of all infrastructure (including non-linear) assessed at or above the minimum level of condition rating.	>90.0%	90.6%	1.007	
4	Full Property Flood Proofing Inspections	The number of inspections completed.	>750	573	0.764	
	Average Index					
Index Standard Points						
Total Actual Points						
		Maximum Available	Including Bor	ius Points	38.5	
	Total Points Earned					

2020 Highlights:

Sewer Renewal

 The total length of local sewers under 750 mm in diameter that were proactively renewed was well in excess of the performance target, allowing Drainage to start to reduce its maintenance backlog.

Infrastructure Condition Rating

 Better than standard performance reflects rehabilitation, replacement and new construction to improve overall system condition. The increase in the Drainage System Rehabilitation program and continued investment in higher value, critical assets, such as large trunks, is expected to contribute to overall ratings improvement in 2021.

2021 Areas for Improvement

Blocked Sewers

• The number of plugged mains increased significantly due to the "toilet paper shortage" in the early part of the pandemic and the resulting increase in prohibited waste (paper towel/ flushable wipes). In 2021, Drainage will undertake a customer education campaign targeted at preventing prohibited waste from entering the sewerage system and will also conduct a thorough review of the high pressure flushing program to identify improvement opportunities.

• Full Property Flood Proofing Inspections

 Flood proofing inspections were suspended between March and the latter half of 2020 due to provincial pandemic restrictions. During the downtime, all technical staff successfully completed the advanced flood prevention training program offered by Fleming College and University of

Waterloo. After restrictions were eased, interior inspections could only be completed safely through the use of video calls.

• In 2021, Drainage will (1) hire three additional Flood Prevention Advisors, (2) develop and implement approaches for focused property level flood prevention efforts in high-risk basins, and (3) develop and implement a flood prevention inspection program for commercial customers.

4.5.4 Safety Index

The Safety Index is a measure of the success of programs and the application of policies that maximizes the safety of employees and the public.

				Actual	
	Index Component	PBR Performance Measure	Standard	Score	Index
1	Near Miss Reporting	The number of near miss reports	>750	1,608	2.144
	Factor	entered in the ESS system.	7730	1,000	2.144
2	Work Site Inspection	Number of Work Site Inspections			
	Factor	and observations completed per	>1,300	1,461	1.124
		year.			
3	Lost Time Frequency	The actual lost time frequency rate.	<0.75	0.17	4.371
	Rate		VO.75	0.17	4.57
4	All Injury Frequency	The actual all injury frequency rate	<4.00	2.23	1.793
	Rate		74.00	2.20	1.795
Average Index					
Index Standard Points					
Total Actual Points					33.4
Maximum Available Including Bonus Points					16.5
Total Points Earned					16.5

2020 Highlights:

Near Miss Reporting Factor

 Ongoing communication of importance of reporting near misses by management and leadership allowed Drainage to significantly exceed it performance targets. In 2021, Drainage will continue to report near misses in its monthly newsletter and will highlight near misses that resulted in improvements to workplace health and safety.

Work Site Inspections Factor

- Similar to near miss reporting, leadership provides on-going communication of the importance of completing inspections to Drainage personnel. Worksite inspection reports are reviewed by leadership on a monthly basis.
- In 2021, Drainage will implement a new inspection module for all employees to facilitate conducting and reporting inspections in real time in the field.

Lost Time Frequency Rate

- Drainage used the Modified Work Program and developed an Injury Management Procedure document to assist frontline foremen and managers to allow injured employees to work in a modified capacity, rather than to be off work.
- In 2021, Drainage will continue to investigate injuries to determine root causes and to develop corrective actions to prevent recurrences.

• All Injury Frequency

• Similar to the Lost Time Frequency metric, in 2021, Drainage will continue to investigate injuries to determine root causes and to develop corrective actions to prevent recurrences.

4.6 Rates and Bill Comparisons

Unlike most cities, where wastewater treatment services and drainage services are combined, EWSI currently has separate bills for wastewater treatment services and for drainage services. Accordingly, in order to provide a better basis for comparison with other cities and communities, bill comparisons in Section 3.6 utilize EWSI's blended wastewater treatment and drainage bills.

5 2020 Annual Operating Plans

Water Services presented the 2020 Annual Operational plan to Utility Committee on February 14, 2020. The purpose of that document was to provide Edmonton City Council, Utility Committee and stakeholders a high level perspective of the major activities and initiatives that Water Services was undertaking. Unlike earlier plans, the 2020 Plan recognized the significant number of initiatives are were either underway or had been identified that were common to both the water and drainage business units. These initiatives were intended to drive synergies and efficiencies and to align the two businesses operationally. As a result, the plan was structured in three major sections: 1) Common Initiatives that are being pursued by Water Services and Drainage Services together, 2) Water Services' specific initiatives and 3) Drainage Services' specific initiatives.

In all three areas, initiatives planned for 2020 were organized within six strategic focus areas:

- 1. Customer Service
- 2. Public Health and the Environment
- 3. Employee and Public Safety
- 4. Employee Development
- 5. Operational Performance
- 6. Growth and Financial Performance

This PBR Progress Report provides an update on the 2020 Operational Plan. All initiatives have been described as either: 1) Completed, indicating that the activities are finished and the initiative is closed, 2) In-progress, indicating that work continues and the initiatives has been continued in the 2021 Operational Plan (as many initiatives are multi–year), or 3) On-going, indicating that the initiatives will never be formally completed as business requirements continue to change (e.g. operational improvement). A large number of initiatives planned for 2020 were delayed from the original timelines due to the impact of the COVID pandemic. This has resulted in many continuing in 2021 and are therefore designated as on-going in the charts below.

5.1 Water and Drainage Services – Common Initiatives

INITIATIVE	Year End Status
Customer Service	
Improve customer service	On-going – In 2020, a new billing system was
The 2nd and 3rd phases of the project will be to	implemented. This entailed significant training of
do an assessment of the rest of EPCOR's	staff to ensure that new processes and
customer facing groups and assessment of how	procedures were well understood and customer
EPCOR's website can be optimized for a	service would not be impacted by the transition.
customer perspective. In 2020, Water D&T will	The next phase of the project will be to do a
cross train and amalgamate existing water	comparison between how customer service is
customer service groups. The other primary	measured across EPCOR to current practice in
focus in 2020 is implementing EPCOR's new	EWSI and an assessment of how EPCOR's

INITIATIVE	Year End Status
billing system and ensuring staff are trained and able to provide a positive customer experience.	website can be further optimized from a customer perspective.
Review developer funding mechanisms to align approaches across all business units Capital investments required to support new development across the city are allocated between developers and ratepayers differently across EPCOR's various lines of business. EWSI is drafting a white paper to establish cost minimization, cost allocation and regulatory principles to be applied in its approach to funding water and drainage infrastructure required to support growth.	In-progress – EWSI continued to hold meetings with UDI to develop a principles based approach. The current focus is modelling the impact of applying common principles consistently across all three utilities. The final proposed approach will be presented to Utility Committee as per their request.
principles to be applied in its approach to funding water and drainage infrastructure required to	

Public Health and the Environment

Develop a Proactive Residuals Strategy –
Develop a strategy for the continued reduction of residuals loading to the North Saskatchewan River. This strategy will revisit options for the potential diversion of water treatment plants residuals to sanitary sewer, landfill or other solids disposal and will explore opportunities to further reduce solids loading to the river and expanding water plants residual solids management to other seasons. EWSI will study

the net environmental benefit of various options.

In-progress – In 2020, a Sustainable Return-On-Investment (SROI) study was completed with multiple stakeholders, including AEP, the CoE and the NSWA. The SROI study examined options for construction of facilities at the water treatment plant that would treat the residuals on site and divert to dewatered residuals to landfill for disposal. Based on a Triple Bottom (TBL) assessment, EWSI has concluded that the costs (financial, environmental and social) of on-site treatment strategies far outweigh the environmental benefits. The SROI study also revealed that information on the environmental impact of the discharges on the river was incomplete. EWSI's proposed residuals strategy for the next 10-year operating approval period is to conduct a more detailed evaluation of the residual discharges to fill in knowledge gaps.

Develop an integrated watershed management strategy for Edmonton - The objective of the IWM strategy is to manage total loadings to the NSR from all municipal discharges in Edmonton and to ensure drinking water security and source water protection for the Edmonton water supply in one unified watershed management program.

In-progress – In 2020, a joint Drainage and Water Canada committee and working group were established to explore, define and potentially implement opportunities in the development of an IWM. The committee produced a strategy document and detailed implementation plan at end of 2020. Activities in 2021 will focus on implementation of the plan.

INITIATIVE	Year End Status
Employee and Public Safety	
Develop and Implement Company-wide Assessments to review standard operating procedures for life saving rules, chemicals and high hazard activities.	On-going – the initial development has commenced with a focus on ensuring conformance to both EPCOR Standards and provincial legislative requirements. Future work will expand this foundation to the other rules. This initiative is being developed in conjunction with the competency program as described below. Additional modules will be develop over time.
Employee Development	
Develop and Implement Company-Wide Competency Based Training for All High Hazard Activities – Competency training will include fall protection, hazardous energy isolation, confined space and lifting devices.	On-going – initial work has commenced on the identified modules. This approach will establish early learnings that will inform the subsequent development of additional modules over time.
Increase awareness of employee growth opportunities through career fairs and other mechanisms - EPCOR intends to leverage relief postings for succession planning, cross functional skill development and knowledge development for in-scope positions. This gives staff the opportunity to take on new roles, demonstrate their ability, diversify their experience, and develop their career. Another objective is to identify immediate knowledge transfer needs and document practices for knowledge transfer.	On-going – "A Day in the Life Of" documents were created to give a realistic job preview as well as outline what type of knowledge, skills and education would be required to be successful in various those roles across the company. The Human Resources team will develop company-wide behaviours/competencies for front line workers and evaluate the results of the pilot program and rollout professional growth for individual contributors company wide.
Improve Employee Engagement and Build a Respectful, Inclusive, Collaborative, Safe and Healthy Work Culture – Water Services will deliver a bi-annual engagement survey and interpret the results and implement action plans to address top drivers and opportunities for engagement. We will pursue a variety of activities through the Diversity Council including increasing awareness of diversity and inclusion at EPCOR, incorporating diversity into hiring practices, supporting employee resource groups and working with Careers: The Next Generation to provide work opportunities for indigenous youth.	On-going – In 2020, the Diversity Council, in concert with leaders across our Business Units, continued to foster a variety of activities and initiatives to drive this focus such as increasing awareness of diversity and inclusion at EPCOR and supporting employee resource groups. A number of Employee Resource Groups (ERGs) were formed. These are grass roots groups formed by employees that share a common diversity characteristic.

INITIATIVE Year End Status

Develop and Implement a Company-Wide Employee Rotation Program – To ensure a strong pool of talent now and into the future, this program will identify suitable candidates for jobto-job or project-to-project opportunities and support all aspects of the transition. On-going – In 2019, all managers completed the Professional Growth Initiative assessment and associated development plans. To date, the focus has been on people leaders and building a solid foundation in order to support our frontline employees and individual contributors with their professional development. 2020 focused on continued work on the development plans and the completion of the PGI assessments for new staff. Formal employee rotation slowed due to the challenges related to the COVID pandemic.

Operational Performance

Develop a Process Improvement Program to Support Productivity Increases – This initiative will develop standardized processes or continuous improvement programs to support productivity increases and service quality improvements. The program will encompass methods, techniques and tools and be used to design, control and analyze both business and operational processes. It is critical that any approach chosen involves the people aspect of the process and integrates processes and systems.

On-going – a team with six sigma credentials has been formed with the intent of that group both conducting process improvement projects themselves as well as developing educational materials to foster a process improvement orientation across the organization. Several process improvement projects have been identified and are under development with a particular focus on the opportunities resulting from the move to the Aurum facility. An educational program is in the final stages of development.

Develop Standardized Project Management Office/Capital Project Management Tools –

This initiative will standardized the way project managers plan, execute and monitor their projects and programs. It involves creation of a project management methodology along with several processes, tools and templates On-going – a cross organizational team has been formed to review project management processes across all business units of EPCOR. The group has identified common process and re-developed many of the supporting documents. More detailed process modelling is currently underway as part of the introduction of the process into the respective business units.

Develop and Implement Strategies for Realizing Synergies between Water and

Drainage – EPCOR has committed to a minimum of 1% annual operational efficiency savings for 2018-2022 and capital cost efficiencies of 10% by 2022 for Drainage Services. The initial focus of this initiative has been on integrating Drainage into EPCOR processes. Recent activities have focused on cross functional teams meeting to identify and

On-going – several short term opportunities for synergies have been identified and implemented. Detailed analysis has been completed to address larger opportunities to move towards a more consolidated approach across water and drainage. Central to this assessment is the planned consolidation of the drainage and water D&T teams at the new Aurum site. A number of specific opportunities related to that move were identified in 2020 and

INITIATIVE	Year End Status
prioritize efficiency opportunities in the areas of	they are currently under development. These
planning, capital and operations.	initiatives will be rolled-out over the next 1-3
	years

Growth and Financial Performance

One Water – Develop an integrated planning and implementation approach to manage finite water resources encompassing all the master plans and IRPs for all EWSI owned assets – Water and Wastewater utilities around the world are enhancing their strategic planning by moving to a "One Water" approach to managing the entire Water cycle in their community. The One Water approach has been defined as a holistic approach to sustainable water management that breaks down the traditional silos within the water utility sector and encourages collaboration between water utilities and other sectors.

In-progress – The One Water initiative started in 2020 with the formation of the One Water Planning group within EWSI, with the following seven focus areas have been prioritized. It is expected that 2021 will continue to focus on the first six priority items, with the final priority around water reuse moving forward on an opportunistic basis should a development require this focus in 2021.

- i) Consumption Patterns
- ii) SanIRP/ SSSF/ Future Wastewater Plants Expansions –
- iii) Growth Strategies for City and Region
- iv) Integrated Watershed Management Systems
- v) Climate Change
- vi) Water/Sanitary and Stormwater Reuse in Industrial Areas

The end objective of One Water is to align the long range planning initiatives across all of the water related business units within EWSI and ensure that decisions are based on data that is consistent and validated within each of the individual IRP plans

Prepare for the 2022-2026 Edmonton PBR -

The strategy will be developed to align Drainage under the same PBR Framework as Water and Gold Bar. EPCOR is proposing to renew the Water PBR rates for another five year term for the period 2022-2026. To stagger the future renewal periods, EPCOR will file the Gold Bar and Drainage PBR applications for a three-year term 2022-2024.

On-going – The majority of the application development was completed in 2020, with only final review planned for 2021 prior to submission to the City of Edmonton Three separate applications have been developed, one each for water, wastewater and drainage along with business cases for the majority of the capital spending. Common appendices are also included to address issues and requirements that cross all three utilities.

Activities in 2021 will be focused on first, answering information requests from City Administration, City Council and external parties in order to provide additional clarity and background information where required. The

INITIATIVE	Year End Status
	approval process then culminates in a public
	hearing where Water Canada will defend the
	prudency of the application and seek formal
	approval from City Council.

5.2 Water Services

INITIATIVE	Year End Status
Customer Service	
Improve Development Processes and Coordination with City of Edmonton and UDI/IDEA – Water Services will focus on better coordination with City Roadways, LRT, Development and Planning group for greenfield and infill development work as well as local industry associations (UDI, IDEA).	On-going – Initiatives to improve coordination with the City continue through 2020. Examples include Roadways, LRT planning and infill development. New requirements will evolve as both organization introduce new processes. EWSI worked with the City and IDEA to develop the Infill Cost Sharing Program which was successfully piloted in 2020. Based on that success, the program is proposed to be expanded in the 2022-2026 Water PBR application.
Improve Operational Coordination with the Regional Water Customer Group (RWCG) – This initiative will improve communication, planning and coordination of operational activities and unplanned events to ensure an effective and coordinated response to planned or unplanned events.	On-going – Information such as reservoir levels, pressure data and other important operational information is now shared between the parties. Additionally, EWSI now regularly attends the RWCG Steering Committee to provide updates on major operational initiatives (e.g. Lead program). Additional work will continue to ensure on-going co-ordination of outages, repairs and other operational activities.
Sustain the Gold Bar Stakeholder Consultation Plan – Water Services will continue provide the public with balanced and objective information to assist with understanding the problem, alternatives, opportunities and/or solutions and to solicit feedback on Gold Bar's long-term requirements at its site in the river valley.	On-going – The Gold Bar Stakeholder consultation plan was developed and executed through 2019 and provides the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions. Shared outcomes and design principles were developed in collaboration with stakeholders that will drive and inform activities at the site. The on-going aspects of that stakeholder engagement program will build upon the success of the work

INITIATIVE	Year End Status
	done in 2019. Due to COVID, there was limited stakeholder engagement in 2020.
Develop a social media strategy for water	In-progress – To further improve outage
main breaks	communication, Water D&T commenced the
	review the process for updating the outage map
	on epcor.com. The intent is to update the map to provide more real time information to customers.
	Water D&T and PGA will also evaluate additional
	means to notify customers of unplanned outages
	and updates. This work was delayed from the
	original schedule and will continue into 2021.
Public Health and the Environment	
	In-progress – A comprehensive climate change
Develop Climate Change Adaptation – River	strategy has been completed in 2018. In 2020,
Flooding Resiliency Plan – Climate Change Strategy identified flooding as the highest risk.	the strategy continued to be operationalized
Conduct flood hazard analysis and develop a	through a number of initiatives and capital plans
flood mitigation plan for Gold Bar and implement	for the facilities. As part of the PBR applications,
flood mitigation measures at the water treatment	plans were developed to mitigate flood risks at
plants.	the plants. This work will continue in 2021 with
	the review of all risks associated with climate
	change on the Edmonton water and wastewater
	system operations and determine the
	appropriate risk ranking. Additionally, an
	outward looking document will be developed that
	can be shared with key stakeholders such as the City of Edmonton Council and Administration,
	Alberta Environment and Parks, and others who
	are interested in the EWS Climate Change
	Adaption Plan. It will be critical to ensure that
	the risks and the plans align with the City of
	Edmonton Climate Change Adaptation Plan that
	was finalized in 2018 and with EPCOR's overall
	Climate Change strategy and Environmental and
	Social Government reporting initiative.
Develop Drinking Water Emergency Plan	Complete – EWSI finalized the BCP in 2019. In
(Troubled Waters) – Water Services will finalize	2020, the focus was on sharing results with
plans for addressing drinking water emergencies	regional customers.
and have in place a clear framework and a	
documented Business Continuity Plan	
(BCP) that addresses water supply or water	
quality emergencies.	

INITIATIVE Year End Status

Execute the Lead Mitigation Strategy in Edmonton and roll out to other communities

 Water Services will develop a proactive means of reducing public health risks to customers from lead and to ensure compliance with the new guidelines for lead in drinking water. **In-progress** – Design of the orthophosphate dosing systems at Rossdale and E.L. Smith WTPs continued in 2020. Construction will be complete and addition of orthophosphate will begin in mid to late 2022. AEP provided formal approval to add orthophosphate to the Edmonton water in early 2020 after receiving an environmental impact assessment from EPCOR. Broader communication plans and messaging related to the implementation of orthophosphate for our customers, specifically: residential; institutional, commercial, and industrial (ICI), as well as the Regional Water Customer Group (RWCG) will happen in mid-2021. A long-term monitoring program starting in 2021 will be developed to optimize and ensure the effectiveness of orthophosphate dosing across Edmonton.

After initial delays due to the impact of COVID-19 in early 2020, the program for full LSL replacements (from "main to meter") started in mid-2020 for high priority LSLs and those LSLs associated with water main renewal projects. The target is to complete 85 high priority and 45 water main renewals full LSLs replacements in 2020. The goals for 2021 is to complete another 100 high priority LSLs, and the overall object is to eliminate the high priority LSLs by end of 2024.

Confirm to ISO 14001 Across All Water Services Sites – Environmental Management Systems (EMS) are required at facilities and treatment systems across Water Services. Those facilities/systems with an Environmental Management Systems built to meet the old standard are required to transition and conform to the new ISO 14001:2015. Complete – all Water Service facilities in Edmonton operate under a common Environmental Management system. Work progressed in 2020 focused on developing plans for implementing ISO14001 at EPCOR regional sites that were not registered and to begin the process of implementing management systems at these sites.

Complete E.L. Smith Solar Project and Smart Grid System – The E.L. Smith Solar Project is planned as a 12 MW solar farm that will provide renewable energy for water treatment plant operations. In conjunction, EWSI has received federal grant funding to build a Smart Grid **On-going** – This project received final approval in October 2020 after considerable public and stakeholder consultation. Construction will commence in 2021.

INITIATIVE	Year End Status
System including a 4 MW battery energy storage system and micro-grid controls.	
Execute Green Energy Purchase Agreement — In addition to the E.L. Smith Solar project, another key component of Water Services' strategy to reduce its environmental footprint is to explore a competitive procurement for new renewable power from other Alberta sources for the remainder of the grid sourced electricity currently used by water operations.	On-going – In 2020, EPCOR Utilities Inc. signed an agreement with Renewable Energy Systems Canada ("RES") to develop and construct a new wind farm in southern Alberta. EPCOR will acquire the Renewable Electricity Certificates ("RECs") from the project for a 20 year term. The combination of this offtake agreement and the E.L. Smith Solar Farm will result in EPCOR Water utilizing 100% green electricity for all its operations within the City of Edmonton. Permitting activities are currently underway and the wind farm is expected to be constructed in summer 2022 with commercial operations commencing in Q4 2022.
Complete Edmonton Water System Renewal Approval	Complete – Edmonton water system approval renewed
Employee and Public Safety	
Move to Adopt ISO 45001 Across all Water Services Sites – Water Services has implemented and obtained registration to the OHSAS 18001 safety management system and is progressing to convert to the updated ISO 45001 safety management system to support continued safety performance improvement.	On-going – For its core Edmonton operations, Water Services has implemented and obtained registration to the OHSAS 18001 safety management system and is progressing to convert to the updated ISO 45001 safety management system to support continued safety performance improvement. EWC operations outside of Edmonton will be evaluated throughout 2021 to establish baseline requirements for conformance to the ISO 45001 standard.
Review Effectiveness of Safe Work Planning Across All Water Services Sites – Safe work planning includes implementing a field level hazard assessment that effectively identifies hazards and implements controls to prevent potential injury to employees, contractors and the public. Water Services will review safe work planning for all locations to strengthen hazard assessment and reinforce safety integration into routine and non-routine tasks.	On-going - EWSI continues to develop and implement company-wide assessments for six of the lifesaving rules and chemicals to effectively review existing procedures to ensure conformance to the EPCOR Standards and provincial legislative requirements
Employee Development	

INITIATIVE Year End Status

All initiatives are detailed in the Common section above

Operational Performance

Develop a Standardized Approach to Asset Management Across Water Services by Confirming to ISO 55000 – The Asset Management Framework will be expanded and adapted to allow greater consistency in how it is applied across business units of Water Services by aligning with the international standard for asset management ISO 55000.

On-going – The Asset Management Methods Office has expanded and adapted the current Asset Management Framework to allow greater consistency in how it is applied across various Business Units of Water Services by aligning with the international standard for asset management, ISO 55000 including creation of a Strategic Asset Management Plan that outlines how Asset Management is to be approached across the business. These asset management plans formed a central input into the development of the 2022-2024/26 PBR capital plans.

Optimize Meter Reading Function – Water Services will seek to optimize the meter reading function through an analysis of current routing as well as the implementation of meter reading technologies to determine if they are viable from a cost benefit perspective. Analysis of the costs and benefits of introducing Automated Meter Reading (AMR) and Advanced Metering Infrastructure (AMI) technology will be completed.

On-going – In 2020, Water Services completed the analysis of the costs and benefits of introducing AMI technology and incorporated the results of that analysis into a business case as part of the submission for the 2022-2026 PBR. The proposed implementation of an AMI network in Edmonton would utilize the existing EDTI communications backbone in order to provide a more cost effective solution than a stand-alone installation. If approved within the PBR, the project will be implemented between 2022 and 2024. Planning and design work will commence in 2021.

Develop a Bio-solids Strategy – Since the 1970's, biosolids have been sent to the Clover Bar lagoons for additional processing and disposal, mostly through composting, landfilling and agricultural land application. Over time, the inventory of biosolids in the lagoons have increased as disposal has not met production, to where there is more than 6 years of inventory stored in the lagoons. Additionally, the City of Edmonton made a decision to close down composting operations, due to the integrity of the facility. An overall strategy is required to address these concerns.

In-progress – In late 2019, the development of a biosolids management program which builds upon past strategies was started. The objectives of the program were to continue to finds ways to beneficially dispose of biosolids, in a financially and environmentally sustainable manner, while reducing the inventory of biosolids in the Clover Bar lagoons. Work in this strategy continued in 2020 and included the development of the PBR business case for the development of a dewatering facility.

Growth and Financial Performance

INITIATIVE	Year End Status
All initiatives are detailed in the Common section above	

5.2 Drainage Services

Initiatives and Objectives	Year End Status
Customer Service	
Build relationships with stakeholders to create trust and understanding – Drainage Services will continue to build stakeholder engagement plans that are aligned with the capital plans.	On-going – In 2020, Drainage Services continued to ensure that stakeholder engagement plans were developed for all major capital projects. This included defining when and how to engage with stakeholders to ensure the largest impact. Work will continue in 2021 to ensure this approach optimized as new capital projects commence.
Build systems, processes and training to provide consistently good service that feels seamless to the customer - continue to evaluate sources of customer escalations and implement remedial actions; reduce the number of escalations and reduce customer service connection time.	 On-going – through 2020, Drainage continued to focus on providing improved levels of customer services, as is evidenced in the supporting metrics: Customer escalations were reduced by 2.4% in 2020 compared to 2019. Note: The target in 2020 was a 0 % decrease from prior year. Customer service connection completion time for 2020 averaged 2.4 weeks versus the target of 5 weeks.
Execute Corrosion and Odour Mitigation Strategy – The Corrosion and Odour Reduction (CORe) Strategy was developed using similar principles and approaches to SIRP program in order to determine an optimized mix of operational and capital solutions to reduce corrosion and odour. The CORe Strategy expands the previous plan by focusing on preventing the formation of H ₂ S gas, which will reduce community odour impacts and lengthen the life of sewer network assets. The current strategy also differs from previous plans by segregating the City into regions with consistent	In-progress – a detailed review of the work completed in 2020 is contained in the 2022-2024 Drainage PBR Application and Appendix I2

Initiativ	es and Objectives	Year End Status
and those with eme approaches are pro ensure that causes	with dynamic odour issues, rging odour issues. Different posed for each region to of the odour are fully ensure that capital projects able relief.	
2018, Drainage Ser from the City of Edn Services to start ser several LRT project that the Valley Line Line Northwest (NW two LRT priorities. notifications, Draina diligently working or Relocation Projects undertaken corresp	vices received notifications nonton requesting Drainage wer facility relocation for s. The notifications indicated West (VLW) and the Metro //) Phase 1 are the City's next Since receiving the City's ige Services has been in the LRT Drainage. Drainage Services has onding investigations, in works for the VLW LRT	In-progress – a detailed review of the work completed in 2020 is contained in the 2022-2024 Drainage PBR Application
District Control (4) and a	□ 1	

Public Health and Environment

Minimize Environmental Impact of Our Operations – As an environmental steward in Edmonton, Drainage Services will minimize our environmental impact in all aspects of our operations. Drainage Services has been working with the City of Edmonton on the climate change initiative through the work on the Stormwater Integrated Resource Plan (SIRP). The purpose of this plan is to identify work that needs to be accomplished to reduce the impact of stormwater flow on Edmonton residents and businesses.

On-going – Drainage Services continues to work towards ensuring that all environmental work is aligned with considerations arising from the SIRP, and Corrosion and Odour Mitigation (CORe) Strategies. The goal remains to reduce flow to the river.

Execute the Stormwater Integrated Resource Plan (SIRP) - As part of the agreement to transfer Drainage Services to EPCOR, EPCOR committed to developing a complete stormwater strategy to reduce flooding risks within the City of Edmonton for urban and riverine flooding events. Drainage Services has created the Stormwater Integrated Resource Plan (SIRP) project to integrate environmental and social externalities;

In-progress – a detailed review of the work completed in 2020 is contained in the 2022-2024 Drainage PBR Application and Appendix I1

Initiatives and Objectives	Year End Status
operational, planning and infrastructure responses; risk assessment and management; financial analysis; and an open participatory process that incorporates continuous improvement. Develop a Strategy to Address Total Loadings in the North Saskatchewan River - Prior to the transition to EPCOR, Drainage Services had developed the Total Loading Plan (TLP) based on a number of strategies developed to reduce and	In-progress – this initiative has been incorporated into the Proactive Residuals Strategy defined above under the Common Water and Drainage section. The overall goal is to develop a strategy for the continued
mitigate impacts on the North Saskatchewan River (NSR) and in alignment with its commitment to continual improvement and environmental stewardship. The plan proposed a number of capital projects and other initiatives to reduce loading to the NSR and tributaries. In 2019, Drainage Services updated the TLP, taking a closer look at targets and objectives of main environmental strategies, such are Sewer Separation, Discharge Improvement Zone, Low Impact Development, Watershed Management, and Interconnection Strategy, with the intent of aligning them with asset management needs and the SIRP.	reduction of residuals loading to the North Saskatchewan River irrespective of the originating business unit.
Employee and Public Safety	

Reduce Tolerance towards safety related risks - Develop customized safe work plans for each unique work area. Implement a new Contractor Management Program, including a framework and guidelines for managing prime contractor accountabilities

Cultivate a culture of Safety Leadership – Ensure that incidents are reported accurately within our Event Reporting System (ERS), investigations are completed in a timely manner, and learnings are shared with all employees

Encourage ownership of safety at all levels -

This initiative includes: focus on hazard recognition and near miss reporting; training of all people leaders to lead an incident investigation; developing an observation program to identify workplace hazards and recommend controls; rolling out driver report cards based on telematics; implementing workplace inspections across Drainage Services.

On-going - as noted above in the drainage metrics section, Drainage Services has made significant progress in improving safety overall. The introduction of new safety metrics in 2020 that align with those in Water and Wastewater Treatment allows direct comparability with the other business units. Drainage Services exceeded all metrics and a number by a significant margin. This performance was the culmination of a number of programs including:

- Safe work plans have been developed for each unique work area. Work is underway to integrate these into a Safe Work Plan App for use in the field.
- The Contractor Management Program, including guidelines for managing prime contractor accountabilities and serious incident response plans, were updated and communicated to managers as required.
- Initiatives intended to develop a strong safety culture continued including training for compliance and conformance, revision of process, near miss and other reporting metrics as well as programs to increase general awareness among staff.
- Training of people leaders to lead incident investigations began in 2019 and continued into 2020. This will form a common approach for incident investigation.
- The installation of fleet telematics was completed in December 2019. Monthly driver report cards are now being produced used by managers to ensure adherence to vehicle safety expectations.
- Targets for workplace observations and inspections by managers and foremen were developed and are included in the 2020 work plan. The total 2020 target of 1,300 inspections was exceeded with actual inspections at 1,461.

Initiatives and Objectives Year End Status

Train Staff for Competency and Confidence -

This initiative includes creating and implementing Hazard Registries for all high risk work; establishing competency based assessments for high risk tasks; and implementing "EPCOR Athletes" – a program to learn about body mechanics and how to incorporate healthy movement into everyday tasks for both field works and office workers.

On-going - The EPCOR Learning and Development team began the development of the formal Competency Assessment Project in 2019. The roll out of the program commenced in 2020.

Employee Development

All initiatives are detailed in the Common section above

Operational Excellence

Develop and optimize end-to-end processes within Drainage – Key objectives include identifying projects that either define or optimize cross-functional processes; deploying telematics to assess vehicle utilization and optimize our fleet; develop a program management model building on the team delivery approach piloted in the control structure program; complete the field technology recommendation that ensures field staff have the platform and connectivity; build an information systems strategy that defines the systems of record and system integration strategy.

In-progress – A comprehensive process review/improvement program continued in 2020 in order to identify improvement opportunities from an "end to end" perspective. The program supports the identification, facilitation and realization of benefits of/from improvement opportunities across the Plan-Design-Build-Operate business cycle in Drainage. There is a particular focus on hand-offs between and within areas as this is when there is the greatest risk of miscommunication, poor transfer of responsibilities, or a breakdown in work continuity. Initial scoping of similar opportunities related specifically from Drainage Services' move to the Aurum facility also commenced in 2020. These opportunities are related to the synergies that would result from co-locating water D&T and Drainage Services in a common facility.

Identify and manage emerging risks – This initiative includes implementing a knowledge transfer program to mitigate the risk of losing technical expertise as well as addressing findings from internal audits to mitigate operational risks.

On-going – Drainage continues to review and update operating procedures to ensure system knowledge is captured. The Operations and Maintenance internal audit was completed in November 2019 and the findings were addressed through 2020.

Growth and Financial Performance

Initiatives and Objectives Year End Status Correct the revenue leakage that is occurring **In Progress –** work continued through 2020 to - In 2019, Drainage Services began an audit of address the issues identified in the original the Stormwater Utility. Through the initial audit. A number of areas were corrected while analysis, the stormwater team found multiple others have been postponed pending the discrepancies in the billing system due to a transition to a new bylaw in 2022. A number of factors including lack of auditing since comprehensive analysis of City of Edmonton system inception in 2003, lack of written properties was completed – currently under standards, information system limitations and discussion with City Administration. billing system limitations.

Appendix A: PBR Plan 2017-2021

A.1 In-City Water and Wastewater

A.1.1 PBR Framework

EWSI's In-City Water and Wastewater rates for the 2017-2021 PBR term are regulated by Edmonton City Council in accordance with the PBR Plan approved in Bylaw 17698. This plan encompasses rates, performance measures, and return on equity. The relationships between these components are designed to ensure that capital and operating cost decisions provide a balance between operational performance, rates, and return on equity, while safeguarding system reliability and service quality, providing fair, stable, predictable rates to rate payers, and providing a basis for the future development of the water and wastewater treatments system.

- PBR Rates. Annual changes to In-City Water and Wastewater rates are limited to inflation, less an efficiency factor, plus Special Rate Adjustments and, in rare cases, Non-Routine Adjustments. The use of a formulaic approach for calculating and setting utility rates acts as a "price cap" providing ratepayers with stable and predictable rates. The efficiency factor, set at 0.25% for the 2017-2021 PBR term, requires EWSI to increase productivity and achieve efficiencies in excess of inflation if it is to meet it targeted return on equity.
- Performance Measures. EWSI's PBR framework includes performance measures for water and wastewater treatment system service quality as described in Schedule 3, Sections 3 and 4 of the Bylaw. EWSI faces financial penalties if it does not meet or exceed performance measure standards, providing assurance to customers that water and wastewater treatment system service quality will not be sacrificed to keep rates low or increase returns to EWSI. EWSI's performance measures are audited annually by an independent accounting firm.
- Return on Equity. The PBR plan incorporates a forecast rate of return on equity commensurate with consumption, cost and other risks that allows EWSI to finance its operational and capital programs, to provide its customers with high levels of service quality and reliability, and to provide "just and reasonable" returns to its shareholder. Achieving this return is dependent on EWSI achieving operating cost efficiencies, meeting or exceeding performance standards, and developing the utility infrastructure needed to provide service to its customers. For the 2017-2021 PBR term, returns on equity are based on a deemed capital structure of 60% debt and 40% equity and a 10.175% rate of return on equity.

A.1.2 Risks and Incentives

The PBR framework provides incentives for EWSI to improve operational performance while achieving cost savings through process improvements and other means. Under this framework, EWSI also assumes the risks associated with water consumption, operating costs, financing costs and capital costs, ensuring that customers are provided with stable and predictable rate increases. These risks and EWSI's strategies to mitigate them include:

- Water Consumption Risk. Under PBR, EWSI bears all of the risks associated with weather-related fluctuations in water consumption and water quality, as well as the longer-term risks associated with declining consumption per customer. EWSI seeks to mitigate consumption risk through the use of robust forecasting methodologies incorporating long term trends in water consumption.
- Operating Cost Risk. EWSI actively works to minimize fluctuations in input prices through long-term power contracts, chemical optimization processes, and continuous efforts to implement cost reduction strategies in all areas of its operations.
- Interest Risk. Fluctuations in short-term interest rates, long-term debt issue costs and in the level of
 capitalized interest have significant impacts on EWSI's net income and return on equity. EWSI
 mitigates interest risk through timing of long-term debt issuances and optimizing working capital.
- Capital Cost Risk. In-City Water and Wastewater's operations are capital intensive and it is often
 difficult to forecast required levels of capital replacements, both at the plants and in the water
 distribution and transmission network. EWSI seeks to minimize these risks through comprehensive
 capital project and asset management programs, ensuring that new projects or changes to existing
 projects are justified and that there is an appropriate level of management, senior management and
 executive oversight over capital spending.

A.1.3 Customer Classes and Rate Structure

A.1.3.1 In-City Water

In-City Water rates consist of fixed monthly service charges that vary with meter size and variable charges applied to each cubic metre of water consumed. Consumption charges differ for each of In-City Water's customer classes. These classes and their rate structures include:

- Residential Customer Class. Residential customers are charged based on an inclining rate structure with three consumption blocks. The inclining rate structure is intended to promote water conservation and provide incentives for residential customers to use water efficiently.
- Multi-Residential Customer Class. Multi-residential customers are charged based on a declining
 rate structure with three consumption blocks. EWSI has found that the cost of providing water to
 individual multi-residential customers declines as the size of the multi-residential building increases.
 As well, there is a wide range of consumption volumes for multi-residential customers. Accordingly,
 a declining rate structure best reflects the cost characteristics of this customer class.
- Commercial Customer Class. Similar to multi-residential customers, commercial customers are charged based on a declining rate structure, but with five consumption blocks to recognize the wide range of average consumption volumes within this customer class.

The 2017-2021 PBR Plan includes three Special Rate Adjustments for In-City Water:

 Special Rate Adjustment for Rebasing. The In-City Water revenue requirement was rebased at the beginning of the 2017-2021 PBR term. The resulting rebasing adjustment to rates includes the on-

going benefits to rate-payers of efficiency gains realized in the 2012-2016 PBR term, the impacts of higher than forecast capital expenditures during the 2012-2016 PBR term; and increases in the capital expenditure programs for the 2017-2021 PBR term. Also included in the rebasing adjustments is the impact of EWSI's cost of service study which has resulted in redistribution of revenue requirements from the Residential and Multi-Residential customer classes to the Commercial customer class.

- Special Rate Adjustment for Accelerated Programs. These Special Rate Adjustments support the
 acceleration of the replacement of water mains as part of the City of Edmonton's neighbourhood
 renewal program and the upgrade of water mains to increase fire protection capacity in
 neighbourhoods experiencing increased densities as a result of infill development.
- Special Rate Adjustments for Environmental Programs. EWSI is undertaking two significant environmental initiatives during the 2017-2021 PBR term. The first initiative is an extensive River Monitoring Project to regularly monitor, evaluate and report on a number of water quality variables from several sampling sites in the river for 2018-2021. This program is forecast to have annual costs of \$1.0 million starting in 2018. The second initiative, which aligns with the City's "The Way We Green" strategy, is a Green Power Initiative to replace approximately 10% of EWSI's total power volumes with energy from locally produced renewable sources starting in 2018. This initiative is forecast to cost \$1.9 million annually commencing in 2018.

A.1.3.2 Wastewater Treatment

Wastewater treatment rates consist of fixed monthly service charges that are applied equally to each customer and variable charges applied to each cubic meter of water consumed. Wastewater has two customer classes:

- Residential Customer Class. Unlike In-City Water, there are no separate rates for multi-residential customers. Instead, customers who would be multi-residential water customers are subject to the same rates as residential wastewater customers. The common rate structure for residential and multi-residential customers recognizes that the costs of wastewater treatment are very similar for residential and multi-residential customers. Accordingly, charges to Residential customers are based on a flat rate structure with a single consumption block.
- Commercial Customer Class. Consumption charges for commercial customers are based on a
 declining rate structure with three consumption blocks to recognize that there are economies of scale
 in wastewater treatment for larger commercial customers. In addition, commercial customers are
 charged overstrength fees for prescribed materials that exceed the concentrations shown in Section
 4 of Schedule 1 to Bylaw 17698.

The 2017-2021 PBR Plan includes a single special rate adjustment for rebasing. Similar to In-City Water, Wastewater's revenue requirement was rebased at the beginning of the 2017-2021 PBR term to reflect efficiency gains realized in the 2012-2016 PBR term, as well as the substantial increases in capital spending needed to deal with the challenges of the aging infrastructure at the Gold Bar Wastewater Treatment Plant.

A.2 Drainage

A.2.1 PBR Framework

EWSI's Drainage rates for the 2018-2022 PBR term are regulated by Edmonton City Council in accordance with the PBR Plan approved in the EPCOR Drainage Services Bylaw 18100. Similar to In-City Water and Wastewater, Drainage's 2018-2022 PBR plan encompasses rates and performance measures, but the mechanisms used to achieve a balance between rates and operational performance differ in important respects, as follows:

- PBR Rates. Bylaw 18100 prescribes drainage fees and charges for the period from January 1, 2018 to March 31, 2022. These fees and charges reflect EWSI's commitment to limit average annual rate increases to 3%. Besides these scheduled rate increases, Bylaw 18100 also includes a mechanism for non-routine adjustments to rates related to emergent City-directed needs.
- Performance Measures. Bylaw 18100 requires Drainage to measure operational performance for the period from January 1, 2018 to December 31, 2019 using performance measures for drainage system service quality modeled after previous City Drainage Services quality metrics. After that time, for the remainder of the 2018-2021 PBR term, Drainage's operational performance will be measured against new performance measures that will be developed Drainage and approved by the Utility Committee. Similar to Water and Wastewater, the new performance measures have a scoring system with financial penalties applied if Drainage does not meet or exceed performance standards. As with Water and Wastewater Treatment, the performance measures scorecard will be audited annually by an independent accounting firm.

A.2.2 Customer Classes and Rate Structure

Drainage has Residential, Multi-Residential and Commercial Customer classes, using the same customer definitions as Water. Drainage's rate revenues are derived from both Sanitary Utility and Stormwater Utility services.

- Drainage has a simple rate structure, with flat monthly service charges varying only by meter size
 regardless of customer class and the same monthly variable rate per cubic meter applicable to all
 customers, regardless of customer class, except the University of Alberta which has a unique rate,
 intended to recognize its lower servicing cost.
- Stormwater Utility revenues are based on the area of the customer's property, development intensity, and zoning, also with common rates regardless of customer class.

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Water Services,
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1 Executive Summary

This report provides an annual update to the City of Edmonton on the operational and financial results for the year ended December 31, 2021 for water services ("In-City Water"), wastewater treatment services ("Wastewater"), and sanitary and stormwater sewer services ("Drainage") provided within Edmonton by EPCOR Water Services Inc. ("EWSI"). The City of Edmonton City Council regulates In-City Water and Wastewater in accordance with the Performance Based Regulation ("PBR") Plan approved in the EPCOR Water Services and Wastewater Treatment Bylaw No. 17698 ("Bylaw 17698") and Drainage in accordance with the PBR Plan approved in EPCOR Drainage Services Bylaw No. 18100 ("Bylaw 18100").

1.1 Financial Performance

In-City Water, Wastewater and Drainage's financial performance for 2021 are summarized in Table 1.1 below¹:

Table 1.1
Revenue and Return on Equity
(\$ millions)

		Α	В	С	D
		20:	21	2017-	2021*
	Revenue and Return on Equity	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	In-City Water				
2	Revenue	217.4	206.9	1,005.4	960.2
3	Return on Equity	44.8	51.0	204.5	204.2
4	Rate of Return on Equity	10.18%	11.46%	10.18%	10.12%
5	Wastewater				
6	Revenue	112.8	107.3	496.3	473.0
7	Return on Equity	21.7	28.0	95.4	106.6
8	Rate of Return on Equity	10.18%	14.25%	10.18%	12.13%
9	Drainage				
10	Revenue	205.7	222.5	787.7	803.8
11	Return on Equity	15.9	34.3	93.5	124.2
12	Rate of Return on Equity	2.64%	5.42%	4.02%	5.13%

^{*2018-2021} for Drainage.

Two key factors impacted Water, Wastewater and Drainage's 2021 financial results. First, an unusually hot and dry summer resulted in the highest total water consumption in over 20 years. Second, the on-going effects of the COVID-19 pandemic continued to shift consumption from the

¹ Consistent with the 2017-2021 PBR Application, all financial data in this report, including totals and sub-totals, are rounded to the nearest \$0.1 million. This practice ensures continuity of data between tables and between years. However, the sum of the rounded detailed data in certain tables may not be equal to the related rounded total or sub-total.

commercial customer class to the residential customer class, with many businesses remaining shuttered and many employees working from home.

In 2021, despite high consumption, In-City Water and Wastewater's revenues were significantly lower than forecast due to lower than PBR forecast inflation in prior years, which resulted in lower than forecast rates. Drainage revenues, which reflect scheduled rates from Bylaw 18100, were greater than forecast, due to both high consumption and revenues from non-routine adjustments for the Stormwater Integrated Resource Plan (SIRP), Corrosion and Odour Reduction (CORe) and LRT relocates.

In 2021, In-City Water achieved an 11.46% rate of return on equity (10.12% for 2017-2021), compared to its forecast rate of return of 10.175%. These results were achieved primarily through operating expense savings that offset lower than forecast revenues.

In 2021, Wastewater achieved a 14.25% rate of return on equity (12.13% for 2017-2021), compared to its forecast rate of return of 10.175%. Lower than forecast operating expenses, combined with a lower than forecast rate base, more than offset reductions in revenue.

In 2021, Drainage achieved a 5.42% rate of return on equity (5.13% for 2018-2021), compared to its forecast rate of return of 2.24% (3.92% for 2018-2021). Higher than forecast revenues, combined with lower than forecast interest expense due to one-time preferential financing from EUI and a lower than forecast rate base, more than offset higher than forecast operating expenses. As discussed in prior years' PBR Progress Reports, Drainage does not have a City of Edmonton-approved PBR forecast. Therefore, over the 2018-2021 period, Drainage's actual financial performance is compared to its 2018 EWSI budget, escalated at an appropriate inflation rate and adjusted for: (i) removal of one-time costs related to the transition of Drainage to EPCOR; and (ii) differences in basis of accounting between International Financial Reporting Standards (IFRS) and regulatory accounting.

These factors, combined with the cost savings realized in prior years, enabled EWSI to exceed its approved return on equity in 2021 and meet or exceed its 2017-2021 ROE.

Detailed analyses of In-City Water, Wastewater and Drainage's financial performance for 2021 and for the 2017-2021 period are provided in sections 2.2, 3.2, and 4.2, respectively.

1.2 Capital Expenditures

In-City Water, Wastewater and Drainage's capital expenditures for 2021 and the five-year term of the PBR Plan (the "2017-2021 PBR term") are summarized in Table 1.2 below:

Table 1.2 Capital Expenditures (\$ millions)

		A B		С	D
		20	2021		2021 ⁽¹⁾
Capital Expenditures		PBR Forecast ⁽²⁾	Actual	PBR Forecast ⁽²⁾	Actual
1	In-City Water	104.0	132.7	515.3	565.9
2	Wastewater	22.1	45.1	235.4	232.9
3	Drainage	254.3	244.8	782.1	726.6

⁽¹⁾ Drainage Forecast and Actual results only include 2018-2021, 2018 is the first full year of Drainage operation following the transfer to EPCOR in September 2017.

Over the course of the PBR term, changes to capital programs are required to address unforeseen needs for repairs or rehabilitation, changes in regulatory or operational requirements, customer demands, and other external factors. These changes are coordinated through EWSI's Project Management Office and are authorized by EWSI's Capital Project Steering Committee, EPCOR Utility Inc.'s (EUI) Financial Review Council, or EPCOR's Board of Directors, depending on the amount of the expenditure. EWSI also presents information on its capital programs, as well as business cases supporting significant new capital projects (i.e. not already included in the approved PBR application), to the Utility Committee throughout the year.

- In-City Water's 2017-2021 capital expenditures of \$565.9 million are \$50.8 million (10%) greater than the PBR forecast. Significant projects contributing to this variance include the E.L. Smith Solar Farm Project (now the kīsikāw pīsim Solar Farm) and Battery Storage System (\$19.4 million), which is funded through the Special Rate Adjustment for Environmental Initiatives; changes to the scope of the Water D&T Facility Expansion Project, which sees the project rolled into the joint Water and Drainage Real Estate Consolidation Project, adds an additional \$6.5 million to its cost; and an increase in developer-driven growth projects such as the Network PD Transmission Mains Program, Water Main Cost Sharing Program, and Water Service Connection Program (\$20.6 million).
- Wastewater's 2017-2021 capital expenditures of \$232.9 million are \$2.6 million (1%) less than the PBR forecast. Since the entire plant cannot be shutdown for maintenance and inspection, it is often difficult to accurately assess asset condition and the scope of rehabilitation needed before commencing work on a project. During preliminary engineering in 2017 and 2018, EWSI identified significant needs for repairs to critical infrastructure, such as sludge lines replacements, clarifier chain replacements, and structural rehab that had not been anticipated in the PBR forecast. EWSI reviewed design options and employed value engineering to reprioritize reliability and life cycle replacements. These efforts have ensured that changes to projections of the total cost of the 2017-2021 capital expenditures program have resulted in only a slight decrease from the PBR forecast.

⁽²⁾ Amounts include capital expenditures approved through Non-Routine adjustments.

Drainage's 2018-2021 capital expenditures of \$726.6 million are \$55.5 million (7%) less
than capital expenditures included in the City Long Term Plan and approved Non-Routine
Adjustments. This decrease reflects substantial shifts of projected costs between
programs as Drainage continues to refine and reprioritize its overall capital expenditures
program to address asset condition, mitigate the risk of failure, and maintain required
service levels.

Detailed explanations for differences between capital expenditures in PBR forecast and EWSI's current projections are provided in Sections 2.3, 3.3 and 4.3.

1.3 Operational Performance

In-City Water's and Wastewater's operational performance is measured by the results of indices prescribed in Schedule 3 of Bylaw 17698 with each index consisting of one or more performance measures. Commencing in 2021, Drainage's operational performance is measured using PBR performance indices approved by City Council on February 19, 2021 as amendments to Bylaw 18100. Drainage's new PBR metrics program is patterned after the Water and Wastewater PBR metrics and meets the requirements of the Letter of Intent developed for the transition of Drainage Services from the City to EPCOR

Operational performance under each index is measured independently on a point basis with 100 base points available if the standards for all performance measure indices are achieved. Bonus points are available for performance above standards and financial penalties are applied if EWSI does not meet the 100 base point standard.

In 2021, In-City Water exceeded the performance standards for all five of its performance measure indices, Wastewater exceeded the performance standards for all four of its performance measure indices, and Drainage exceeded the performance standards for three of its four performance measure indices. Detailed discussions of the performance measures making up each of the indices and operational performance highlights are provided in Section 2.4 for In-City Water, Section 3.4 for Wastewater, and Section 4.4 for Drainage.

Table 1.3-1
2021 Performance Measures and Standards

		Α	В	С	D	E	F
		In-City	Water Wast		water	Drair	hage
	Performance Index		Actual		Actual		Actual
		Standard	Score	Standard	Score	Standard	Score
1	Water Quality Index ⁽¹⁾	25.0	25.0	55.0	60.5	30.0	33.0
2	Customer Service Index	20.0	21.1	15.0	16.5	20.0	22.0
3	System Reliability and Optimization	25.0	28.5	15.0	16.5	35.0	30.4
	Index						
4	Environmental Index ⁽¹⁾	15.0	16.5	-	-	-	-
5	Safety Index	15.0	16.5	15.0	16.5	15.0	16.5
6	Aggregate Points Earned	100.0	107.6	100.0	110.0	100.0	101.9

¹ Water Quality and Environmental are combined into one index for Wastewater's and Drainage's operational performance

1.4 Rates and Bill Comparisons

In 2021, the average monthly bill for In-City Water customers, based on 2021 average monthly consumption per residential customer of 15.1 m³, was **\$41.77**, an increase of \$1.88 (4.7%) from 2020. This increase reflects two factors: first, a 2.3% increase in rates related to the inflation adjustment discussed in section 2.3.1 and Special Rate Adjustments for Environmental Initiatives, Accelerated Programs and Rebasing; and, second, a 2.4% increase related to an increase in consumption of 0.4 m³ per residential customer per month between 2020 and 2021.

The average residential customer's wastewater treatment bill in 2021, also based on monthly consumption of 15.1 m³, was \$20.71, an increase of 7.3% from 2020. This increase consists of a 2.1% increase due to higher consumption per customer and a 5.2% increase due to the inflation adjustment and the Special Rate Adjustment for rebasing needed to support Wastewater's 2017-2021 capital programs.

The average residential customer's drainage bill in 2021, again based on monthly consumption of 15.1 m³, was \$40.46, an increase of 6.6% from 2020. This increase consists of the annual 3.0% increase set in Bylaw 18100, and Non-Routine Adjustments approved in 2019 for the Corrosion and Odour Reduction Strategy (1.6%), the Stormwater Integrated Resource Plan (1.5%), and LRT related Drainage Infrastructure Relocations (0.4%).

EWSI undertakes annual bill comparison surveys with various cities and local communities. Section 2.5 shows that EWSI's residential water rates are competitive with most of the cities and communities included in the comparison, with only Vancouver having significantly lower water rates. Drainage and Wastewater bills are more difficult to compare because of variations in the nature and extent of wastewater treatment, the inclusion of certain services in property taxes, and geographic and climatic factors which influence the level of investment in and approach to flood mitigation. Section 3.6 shows that Edmonton's combined Drainage and Wastewater Treatment bills are competitive with those of other cities and communities with similar geographic and climatic conditions. Commercial bill comparisons for both water and wastewater show similar results to residential water and wastewater bills.

1.5 Non-Routine Adjustments

Non-Routine Adjustments for In-City Water and Wastewater are defined in Bylaw 17698, and for Drainage in Bylaw 18100, as "items which are unusual, significant in size or nature, and beyond the scope of control of EWSI". Bylaws 17698 and 18100 allow EWSI to request adjustments to In-City Water, Wastewater and Drainage rates for Non-Routine Adjustments from the City Manager or City Council, depending on financial impact.

In 2019, EWSI received approval to increase In-City Water and Drainage rates for the following projects that qualified as Non-Routine Adjustments outlined in Bylaw 17698, Schedule 3, Section 5.0 for Water and Wastewater, or in Bylaw 18100, Schedule 3, Section 4.1 for Drainage. These non-routine adjustments were included in Drainage rates commencing January 1, 2020, January

1, 2021, and January 1, 2022, and In-City Water rates commencing April 1, 2020 and escalated by inflation less the productivity factor on April 1, 2021.

- Lead Mitigation Strategy (In-City Water) On March 22, 2019, EWSI presented a new lead mitigation strategy to the Utility Committee. This strategy is designed to meet new Health Canada Guidelines that reduce the maximum concentration of lead in drinking water at the tap from 10 parts per billion to 5 parts per billion. On July 16, 2019, EWSI received approval to apply the Non-Routine Adjustments to In-City water rates commencing April 1, 2021 to recover the costs of implementing this strategy. The additional cost to an average residential In-City Water customer was \$0.41 per month commencing April 1, 2021 (or a total of \$10.91 over the 2017-2021 PBR term).
- Leduc County Annexation (In-City Water) On November 27 2018, the Government of Alberta approved the City of Edmonton's annexation of 8,260 hectares from Leduc County. As part of the annexation, EWSI acquired the existing water infrastructure within or required to service the annexed area, including a reservoir, pump house and booster station, as well as transmission mains and a small distribution system, at a cost of \$9.5 million which is comprised of \$7.8 million for the Discovery Park reservoir and the remainder for a pipeline and booster station. On November 7, 2019, EWSI received approval to apply the Non-Routine Adjustments to In-City Water rates commencing April 1, 2021 to recover the costs related to the annexation. The additional cost to the average residential In-City Water customer was \$0.26 per month commencing April 1, 2021 (or a total of \$7.09 over the 2017-2021 PBR term).
- LRT Relocations (In-City Water and Drainage) EWSI has identified work needed to accommodate water main, hydrant and sewer relocations for the West Valley Line and Metro Line Northwest Phase I LRT projects. On November 7, 2019, (Drainage) and December 23, 2019 (In-City Water) EWSI received approvals to apply the Non-Routine Adjustments to water rates for In-City Water customers commencing April 1, 2020 and to Sanitary Utility and Storm Water Utility rates for Drainage customers commencing January 1, 2020. The additional cost to the average residential In-City Water customer was \$0.17 per month commencing April 1, 2020 (\$4.64 over the 2017-2021 PBR term). The average monthly bill increase for residential Drainage customers was \$0.14 per month commencing January 1, 2020, an additional \$0.37 per month commencing in January 1, 2021, and an additional \$0.31 per month commencing on January 1, 2022 (or a total of \$10.26 over the 2018-2021 PBR term).
- Stormwater Integrated Resource Plan (Drainage) On May 10, 2019, EWSI presented its Stormwater Integrated Resource Plan (SIRP) alternatives to the Utility Committee. The plan includes a mix of capital and operational program investments to mitigate flood risks across the City using a mix of grey and green infrastructure components installed within the public right-of-way or within City or EPCOR owned parcels. The SIRP approach allows for a lower overall capital investment than seen with traditional engineering approaches through the inclusion of operational programs that support the overall community in responding to flooding events. On December 2, 2019, EWSI received approval to apply the Non-Routine Adjustments to Storm Water Utility rates commencing January 1, 2021. The additional cost to the average residential Drainage customer was \$0.51 per month commencing January 1,

2020, an additional \$0.15 per month commencing January 1, 2021, and an additional \$0.03 commencing January 1, 2022 (or a total of \$16.11 over the 2018-2021 PBR term).

• Corrosion and Odour Reduction Strategy (Drainage) – On June 28 2019, EWSI presented its Corrosion and Odour Reduction Strategy to the Utility Committee. The Corrosion and Odour Reduction Strategy was developed using similar principles and approaches to EWSI's SIRP to determine an optimized mix of operational and capital solutions to reduce corrosion and odour. The strategy expands the previous plan by focusing on preventing the formation of hydrogen sulphide gas, which will reduce community odour impacts and lengthen the life of sewer network assets. Areas of focus within the strategy include: prevent the formation of hydrogen sulphide gas in the sewer system, control the release of air from the sewer system, and adapt the system using real-time monitoring technologies and improved inspection data. On December 2, 2019, EWSI received approval to apply the Non-Routine Adjustments to Sanitary Utility rates commencing January 1, 2021. The additional cost to the average Residential Drainage customer was \$0.53 per month commencing January 1, 2020, an additional \$0.42 per month commencing January 1, 2021, and an additional \$0.06 per month commencing January 1, 2022 (or a total of \$20.79 over the 2018-2021 PBR term).

Table 1.5 summarizes the average residential customer monthly bill impact for all Non-Routine Adjustments that have been approved for EWSI's In-City Water and Drainage customers over the 2017-2021 PBR term. These Non-Routine Adjustments include the five Non-Routine Adjustments detailed above, plus the negative Non-Routine Adjustment approved in 2018, passing on reductions in corporate shared service cost allocations resulting from the transfer of Drainage Services assets to EPCOR to In-City Water and Wastewater customers. These Non-Routine Adjustments expire on March 31, 2022 at the end of the current PBR term.

Table 1.5

Monthly Residential Bill Impacts

Water and Drainage Approved Non-Routine Adjustments

(2017-2021 PBR Term)

(\$/month)

		Α	В	С
	Non-Routine Adjustment	2020	2021	2022* (Jan to Mar)
1	Corporate Cost Reduction (Drainage Transfer)	(1.04)	(1.05)	(1.05)
2	Lead Mitigation Strategy	0.40	0.41	0.41
3	Leduc County Annexation	0.26	0.26	0.26
4	LRT Relocations	0.31	0.68	0.99
5	Corrosion and Odour Reduction Strategy	0.53	0.95	1.01
6	Stormwater Integrated Resource Plan	0.51	0.66	0.69
7	Total Monthly Bill Impact	0.97	1.91	2.31

EWSI's Bylaw 17698 expired on March 31, 2022. New Bylaw 19626 with updated rates would be in effect for the remainder of 2022.

2 In-City Water Services

2.1 Customers and Consumption

In-City Water provides services to three customer classes: residential; multi-residential; and commercial (see Appendix A). These classes are unchanged from the previous PBR term and are described in detail in Appendix A. Customer counts, total annual consumption and monthly consumption per customer are shown in Table 2.1 below:

Table 2.1

Customers, Consumption and Consumption per Customer

	A B C D						
		20	21	2017-2021			
	Customers and Consumption	PBR		PBR			
		Forecast	Actual	Forecast	Actual		
1	Customers (average for 2017-2021)						
2	Residential	276,347	277,950	266,232	268,830		
3	Multi-Residential	3,929	3,805	3,837	3,776		
4	Commercial	20,278	20,069	19,764	19,790		
5	Total	300,555	301,825	289,834	292,396		
6	Consumption per Customer (m³ per month)						
7	Residential	13.7	15.1	14.2	14.5		
8	Multi-Residential	408.6	421.1	408.6	401.5		
9	Commercial	117.2	92.8	120.3	105.0		
10	Annual Consumption (ML)						
11	Residential	45,459	50,305	226,216	234,323		
12	Multi-Residential	19,268	19,229	94,081	90,962		
13	Commercial	28,520	22,342	142,647	124,647		
14	Total	93,247	91,876	462,944	449,932		

The factors contributing to actual to forecast differences for 2021 and for 2017-2021 differ by customer class, as explained below:

- Residential. Customer counts in 2021 are 0.6% greater than forecast, primarily because of higher than forecast customer growth at the beginning of the 2017-2021 PBR term. Consumption per customer was higher than forecast, both in 2021 and overall over the 2017-2021 PBR term as the result of Edmontonians spending more time at home during the COVID-19 pandemic. The combined effect of these factors is that total residential consumption for 2021 is 10.7%% higher than forecast (3.6% greater for 2017-2021).
- Multi-Residential. Customer counts are 3.2% less than forecasts, continuing trends seen in 2018-2020. Consumption per customer exceeded the forecast in 2021, largely due to the COVID-19 pandemic. With lower customer counts and higher consumption per customer largely offsetting one another, the total multi-residential consumption was just 0.2% lower than forecast in 2021 (3.3% lower than forecast for 2017-2021).

• Commercial. The commercial class was significantly impacted by the COVID-19 pandemic in 2021. Total consumption in the commercial customer class was 21.7% lower than forecast (8.4% lower in 2019 and 25.0% lower in 2020), while customer counts were 1.0% lower than forecast. Largely attributable to public health guidance and restrictions put in place throughout the pandemic (closed facilities, capacity/occupancy limits, travel restrictions, employees working from home, etc.), nearly all industries experienced a decrease in consumption in 2021. Over the 2017-2021 period total commercial consumption is 12.6% lower than forecast.

2.2 Financial Performance

In-City Water's net income is derived from the provision of water services within Edmonton's boundaries. Besides these services, EWSI provides water services to surrounding communities under bulk water supply agreements with regional water service commissions ("RWCG" or "Regional Customers"), and fire protection services to the City of Edmonton under a service agreement ("Fire Protection").

EWSI's water system is fully integrated, with services jointly provided to In-City Water, Regional Customers and Fire Protection. Therefore, in sections 2.2.1 to 2.2.7, operating costs, depreciation, rate base and capital expenditures are presented and analyzed on a total system basis. In-City Water's share of these expenses, as well as its returns on rate base, are calculated in accordance with a cost of service model developed jointly by EWSI, the regional water service commissions and the City of Edmonton, and are shown as separate line items on each applicable table. In-City Water's total revenue and revenue requirements are summarized in Table 2.2 below:

Table 2.2
In-City Water Revenue Requirement
(\$ millions)

		Α	В	С	D	
		20:	21	2017-	7-2021	
	Summary of Revenue Requirement	PBR		PBR		
		Forecast	Actual	Forecast	Actual	
1	In-City Water Rate Revenue ⁽¹⁾	217.4	206.9	1,005.4	960.2	
2	In-City Water Revenue Requirement					
3	Operating expenses	112.9	98.7	538.1	494.5	
4	Other revenue	(5.2)	(4.9)	(25.3)	(26.2)	
5	Depreciation and amortization	30.9	32.4	141.6	144.5	
6	Return on rate base financed by debt	31.8	29.7	146.5	143.2	
7	Return on rate base financed by equity	44.8	51.0	204.5	204.2	
8	In-City Water Revenue Requirement	215.2	206.9	1,005.4	960.2	
9	Return on Rate Base Financed by Equity	10.18%	11.46%	10.18%	10.12%	

¹ In the PBR forecast, rebasing and other special rate adjustments have been smoothed over the PBR term. Therefore, although forecast revenue is equal to the revenue requirement over the 2017-2021 PBR term, in any year within the PBR term, forecast revenue may be greater or less than the revenue requirement.

2.2.1 Revenue

In-City Water's rate revenues include fixed monthly services charges which vary by meter size and consumption charges applied to each cubic meter of water consumed. Besides rate revenue, In-City Water revenues also include other revenue derived from temporary services, connection fees, water permits, late payment charges and other incidental services. Table 2.2.1-1 below provides a comparison of 2021 In-City Water revenues to the PBR forecast:

Table 2.2.1-1
In-City Water Revenue
(\$ millions)

	(4	Á	В	С	D
		202	2021		2021
	In-City Water Revenue	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Fixed Monthly Service Charges				
2	Residential	26.6	25.3	121.6	114.2
3	Multi-Residential	1.6	1.6	7.5	7.1
4	Commercial	4.9	4.7	22.3	21.0
5	Fixed Monthly Service Charges	33.0	31.6	151.4	142.3
6	Consumption Charges				
7	Residential	108.5	111.7	504.0	502.4
8	Multi-Residential	34.6	32.4	158.0	149.1
9	Commercial	41.2	31.2	191.9	166.3
10	Consumption Charges	184.3	175.3	854.0	817.8
11	In-City Water Rate Revenue	217.4	206.9	1,005.4	960.2
12	Other Revenue	5.2	4.9	25.3	26.2
13	Total In-City Water Revenue	222.6	211.8	1030.7	986.4

In-City rate revenues were \$10.5 million less than forecast in 2021, and \$45.2 million less than forecast over the 2017-2021 PBR period. This difference is attributable to the following factors:

• Lower than forecast inflation meant that 2021 revenues were \$6.9 million less than forecast (\$23.4 million for 2017-2021). The PBR plan limits Water and Wastewater's annual routine rate adjustments to inflation less an efficiency factor (see Appendix A.1). As shown in Table 2.2.1-2, actual PBR inflation adjustments for 2021 and 2017-2021 were significantly less than forecast. The effect of lower than forecast inflation from 2017 to 2021 will continue to impact revenues throughout the remainder of the 2017-2021 PBR term.

Table 2.2.1-2
2021 PBR Inflation Adjustment

		Α	В	С	D
	PBR Inflation Adjustment to In-City Water	202	21	2017-2021	
	and Wastewater Rates	PBR		PBR	
	and wastewater Rates	Forecast	Actual	Forecast	Actual
1	Forecast Inflation				
2	CPI	2.20%	2.00%	11.49%	10.41%
3	Labour	2.40%	0.10%	12.59%	6.97%
4	Weighted Inflation (65% CPI, 35% Labour)	2.27%	1.34%	11.88%	9.21%
5	Less: Efficiency Factor	-0.25%	-0.25%	-1.24%	-1.24%
6	Forecast Inflation	2.02%	1.09%	10.64%	7.97%
7	Actual to Forecast Inflation Adjustment	-	-0.21%	0.00%	-1.85%
8	PBR Inflation	2.02%	0.88%	10.52%	5.88%

- In 2021, even though overall consumption was less than forecast, the shift in consumption
 from the commercial customer class to the residential class resulted in a \$3.2 million increase
 in 2021 revenues for the residential class. Over the 2017-2021 PBR term, lower than forecast
 consumption resulted in a \$36.2 million decrease in consumption revenue. Fixed monthly
 charges were affected by variances in customer counts, decreasing 2021 revenue by \$1.4
 million and decreasing 2017-2021 revenues by \$9.1 million relative to the PBR forecast;
- Non-routine adjustments (see section 1.5) increased 2021 revenues by \$0.4 million decreased 2017-2021 revenues by \$5.2 million; and
- A \$6.5 million revenue reduction due to reclassification of the Green Power SRA collected over the 2017-2021 PBR term from revenue to a contribution to the solar project. (\$1.07 million - service charges, \$5.46 million - consumption charges)

Besides rate revenues, In-City Water earned \$4.9 million in other revenue in 2021, \$0.3 million lower than forecast (\$0.9 million greater for 2017-2021). This is comprised of a number of offsetting items, none of which are individually significant.

2.2.2 Operating Expenses by Function

Table 2.2.2 below provides a comparison of EWSI's total water system operating expenses for 2021 to the PBR forecast.

Table 2.2.2
Water Operating Expenses by Function
(\$ millions)

	·	Α	В	С	D
		202	1	2017-2	021
	Function and Sub-function	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Power, Other Utilities and Chemicals				
2	Power and Other Utilities	15.0	11.4	70.1	54.5
3	Chemicals	7.7	5.3	37.2	43.6
4	Power, Other Utilities and Chemicals	22.7	16.7	107.3	98.1
5	Water Operations				
6	Water Treatment Plants	20.4	21.0	98.0	97.8
7	Water Distribution and Transmission	26.7	22.3	128.1	122.2
8	Operational Support Services	7.9	5.8	37.8	32.6
9	Quality Assurance and Environment	6.9	6.3	32.1	31.5
10	Capitalized Overhead Costs	(7.8)	(8.0)	(37.1)	(39.2)
11	Water Operations	54.0	47.4	258.9	244.9
12	Billing, Meters and Customer Service				
13	Billing and Collections	9.1	8.5	42.1	41.3
14	Meter Reading, Repairs and Maintenance	3.0	1.5	14.8	10.2
15	Customer Service	0.9	0.4	4.1	2.4
16	Billing, Meters and Customer Service	12.9	10.3	61.0	53.9
17	EWSI Shared Services				
18	EWSI Shared Services	10.6	10.9	50.9	49.3
19	Incentive and Other Compensation	3.4	4.2	16.3	18.1
20	EWSI Shared Services	14.0	15.1	67.3	67.4
21	Corporate Shared Services	16.2	13.5	78.0	62.6
22	Franchise Fees and Property Taxes				
23	Franchise Fees	16.9	16.6	79.0	75.8
24	Property Taxes	0.5	0.7	2.2	1.9
25	Franchise Fees and Property Taxes	17.4	17.3	81.2	77.7
26	Total Operating Expenses by Function	137.3	120.4	653.7	604.7
27	In-City Water Share - %	82.3%	81.9%	82.3%	81.8%
28	In-City Water Share - \$	112.9	98.7	538.1	494.5

Overall, total operating expenses for 2021 were \$16.9 million lower than the PBR forecast, and \$49.0 million lower over the 2017-2021 PBR period. Key factors contributing to this difference include:

- Power and Other Utilities \$3.6 million less than forecast in 2021 (\$15.6 million less for 2017-2021) due to lower than forecast power prices and distribution & transmission charges and savings associated with the green power premium that was included in the PBR forecast. The PBR forecast included annual renewable (green power) power purchases of \$1.9 million annually, starting in 2018. Rather than purchasing locally produced renewable energy, EWSI has integrated a solar farm into the E.L. Smith water treatment plant. In the 2022-2026 PBR Application revenue collected through the Green Power Special Rate Adjustment has been treated as a contribution toward the kīsikāw pīsim Solar Farm Project, which will decrease EWSI's revenue requirement and customer bills in the 2022-2026 PBR term.
- Chemicals \$2.4 million less than forecast in 2021 (\$6.4 million greater than forecast for 2017-2021). In 2021, lower than average precipitation (surface run off) resulted in below-

average colour in the river over the summer months requiring the use of less chemicals (alum, carbon, and caustic soda) in the water treatment process. On average over the 2017-2021 PBR period, average precipitation was above-average, resulting in the use of more chemicals.

- Water Treatment Plants \$0.6 million greater than forecast in 2021 (\$0.2 million less than forecast for 2017-2021). Higher than forecast costs in 2021 are attributable to several factors, including: salary costs higher by \$2.0 million and higher contractor costs of \$0.6 million related to snow removal. Higher labour costs are partially offset by a higher than forecast proportion of internal labour working on capital projects, which increased capital recoveries by \$1.0 million. The remainder of the actual to forecast difference consists of numerous small items, none of which are individually significant.
- Water Distribution and Transmission \$4.4 million lower than forecast in 2021 (\$5.9 million lower for 2017-2021). Lower than forecast costs in 2021 are attributable to several factors, including: a change in accounting treatment resulting in capitalization of valve and service replacement work which was previously expensed, which reduced operating expenses by \$3.5 million (\$6.8 million for 2017-2021); and lower staff costs of \$2.5 million (\$1.0 million less for 2017-2021). The 2017-2021 variance also includes reductions in fringe benefit costs of \$2.5 million and net fleet recoveries of \$1.0 million due to an increase in capital work. The remainder of the actual to forecast difference consists of numerous small items, none of which are individually significant.
- Operational Support Services \$2.1 million less than forecast in 2021 (\$5.2 million less for 2017-2021). Lower than forecast costs are attributable to lower contractor costs related to the River Monitoring Program due to COVID-19 restrictions (0.4 million lower than forecast for 2021), the transfer of the Knowledge management group to Shared Services and vacancies in the Project Management Office (total \$0.4 million lower than forecast for 2021) and the transfer of custodians to the Water Treatment Plant Maintenance Group. The 2017-2021 variance in this function is primarily attributable to lower staff costs of \$3.7 million related to vacant positions within the Project and Asset Management functions and the transfer of the Knowledge Management function to Corporate Shared Service in 2019; and lower than forecast legal costs of \$0.7 million, as less external legal support was required.
- Billing, Meters, and Customer Service \$2.6 million less than forecast in 2021 (\$7.1 million less for 2017-2021). Process improvements led to \$1.9 million in operating savings, and \$0.5 million for lower Drainage Counter service fees (\$0.9 million less for 2017-2021). Over 2017-2021 this is offset by higher lease costs of \$0.7 million related to end of lease obligations at the Montrose facility. The remainder of the actual to forecast difference consists of numerous small items, none of which are individually significant.
- **EWSI Shared Services** \$1.1 million higher than forecast in 2021 (\$0.1 million higher than forecast for 2017-2021). Higher than forecast costs in this category reflect a \$0.3 million increase in business unit allocations (\$1.6 less for 2017-2021) and higher than forecast incentive compensation of \$0.8 million (\$1.8 higher for 2017-2021).
- Corporate Shared Services \$2.7 million less than forecast in 2021 (\$15.4 million less than forecast for 2017-2021). These differences reflect both the reduction in corporate shared

services cost allocations resulting from the transfer of Drainage from the City of Edmonton to EPCOR, which are fully offset by the non-routine adjustment to rates described in Section 1.5, as well as cost savings in EUI's corporate functions.

Franchise Fees and Property Taxes – \$0.1 million less than forecast in 2021 (\$3.5 million less than forecast for 2017-2021). Lower than forecast franchise fees are entirely attributable to lower than forecast revenues. Variations in property taxes result from differences in the timing of the purchase of a new D&T facility in 2021, rather than in 2017 as had been contemplated in the 2017-2021 PBR forecast.

Variances in other operating expense functions and sub-functions are not significant, either individually or in aggregate.

In 2021, In-City Water's share of operating expenses was \$98.7 million (81.9%), compared to \$112.9 million (82.3%) in the PBR forecast. This result reflects both lower total operating expenses for EWSI's total water system and a 1.0% decrease in In-City Water's share of operating expenses determined through the cost of service model.

2.2.3 Operating Expenses by Cost Category

Table 2.2.3 below shows operating expenses by cost category for Water Operations, Billing Meters and Customer Service, and EWSI Shared Services, where cost categories differ from the sub-functions in Section 2.2.2.

Table 2.2.3
Water Operating Expenses by Cost Category
(\$ millions)

		Α	В	С	D
		202	1	2017-2	2021
	Cost Category	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Water Operations				
2	Staff Costs and Employee Benefits	44.0	39.6	211.3	198.7
3	Contractors and Consultants	8.3	7.9	39.0	41.4
4	Vehicles	1.6	0.7	7.7	4.6
5	Materials and Supplies	3.3	3.7	15.8	18.5
6	Other	4.6	3.6	22.2	20.9
6	Capitalized Overhead Costs	(7.8)	(8.0)	(37.1)	(39.2)
7	Water Operations	54.0	47.4	258.9	244.9
8	Billing, Meters and Customer Service				
9	CUS Charges	9.1	8.5	42.1	41.3
10	Staff Costs and Employee Benefits	7.4	5.3	34.8	29.2
11	Contractors and Consultants	0.6	0.0	2.7	1.2
12	Vehicles	0.3	0.1	1.6	0.8
13	Other	0.6	0.9	2.8	3.6
14	Meter Reading Services (Recoveries)	(5.0)	(4.4)	(22.9)	(22.1)
15	Billing, Meters and Customer Service	12.9	10.3	61.0	53.9
16	EWSI Shared Services				
17	EWSI Shared Services Allocation	10.7	11.1	51.2	49.5
18	Staff Costs and Employee Benefits	3.4	3.8	16.4	17.7

		Α	В	С	D
			1	2017-2	2021
	Cost Category	PBR		PBR	
		Forecast	Actual	Forecast	Actual
19	Contractors and Consultants	0.2	0.2	1.0	8.0
20	Other	(0.3)	(0.0)	(1.4)	(0.7)
21	EWSI Shared Services	14.0	15.1	67.3	67.4

The information presented in this table supports the explanations of differences between 2021 actual and forecast expenses provided in Section 2.2.2. Accordingly, no additional explanations are considered necessary.

2.2.4 Depreciation and Amortization

EWSI total system depreciation expense and amortization of contributed assets for 2021 are shown in Table 2.2.4 below:

Table 2.2.4
Water Depreciation and Amortization
(\$ millions)

		Α	В	С	D
		20	21	2017-2021	
	Depreciation and Amortization	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Gross depreciation expense	49.2	53.4	228.8	238.8
2	Amortization of contributions	(10.1)	(12.0)	(49.5)	(54.7)
3	Depreciation, net	39.1	41.3	179.4	183.5
4	In-City Water Share - %	79.1%	78.4%	79.0%	78.8%
5	In-City Water Share - \$	30.9	32.4	141.6	144.5

Depreciation expense and amortization of contributions in 2021 and for the 2017-2021 PBR term are higher due to both the adjustments to EPCOR's capital programs explained in section 2.3.1, as well as slightly higher than forecast depreciation and amortization rates related to differences in asset mix.

In-City Water's share of 2021 depreciation expense is 0.7% lower than forecast. Approximately 1.0% of this difference is attributable to higher than forecast asset additions for fire protection related assets (hydrants). The offsetting 0.3% difference is consistent with actual to forecast differences in the base and max day peaking factors used to allocate depreciation expense between the In-City and RWCG customer segments.

2.2.5 Rate Base

In 2021, EWSI's total water system rate base, shown in Table 2.2.5 below, was \$38.2 million more than forecast, with the higher than forecast gross rate base partially offset by higher than forecast contributions.

Table 2.2.5
Water Mid-Year Rate Base
(\$ millions)

	· · · ·	Α	В
		20	21
	Components of Mid-Year Rate Base	PBR	
		Forecast	Actual
1	Plant in Service		
2	Balance, beginning of year	2,541.0	2,688.0
3	Additions - EPCOR-funded	109.5	96.8
4	Additions - Contributed	7.7	26.6
5	Retirements and adjustments	ı	(11.6)
6	Balance, end of year	2,658.2	2,799.1
7	Mid-Year Plant in service	2,599.6	2,743.6
8	Accumulated Depreciation		
9	Balance, beginning of year	698.4	674.4
10	Depreciation expense	49.2	53.4
11	Retirements and adjustments	-	(11.6)
12	Balance, end of year	747.6	716.2
13	Mid-Year Accumulated Depreciation	723.0	695.3
14	Other Rate Base Items		
15	Working Capital	24.5	23.8
16	Materials and Supplies	2.9	4.5
17	Gross Mid-Year Rate Base	1,904.0	2,076.6
19	Contributions		
20	Balance, beginning of year	701.2	829.7
21	Contributions in aid of construction	7.7	26.6
22	Retirements and adjustments	-	1.5
23	Balance, end of year	708.9	857.8
24	Mid-Year Contributions	705.1	843.8
25	Accumulated Amortization		
26	Balance, beginning of year	188.0	191.6
27	Amortization of contributions	10.1	12.0
28	Retirements and adjustments	-	(0.2)
29	Balance, end of year	198.1	203.3
30	Mid-Year Accumulated Amortization	193.0	197.4
31	Mid-Year Contributions	512.0	646.3
32	Net Mid-Year Rate Base	1,392.0	1,430.2

The gross rate base reflects significantly higher than forecast levels of developer-funded assets over the 2016 to 2021 period. Developers are responsible for construction of distribution infrastructure in new subdivisions. When these assets are placed into service, ownership of the assets is transferred to EWSI, where the assets, together with offsetting contributions in aid of construction, are added to the rate base.

In 2021, the net mid-year rate base is \$38.2 million or 2.8% greater than forecast. This increase in rate base is driven by higher than forecast capital expenditures as discussed in section 2.3.1.

2.2.6 Return on Rate Base

In 2021, In-City Water's return on rate base was \$4.2 million (5.5%) greater than forecast and \$3.6 million (1.0%) less for 2017-2021. Approximately \$2.2 million of the 2021 difference results from revenue smoothing, where rate increases related to the Special Rate Adjustments for Rebasing are smoothed over the PBR term. The remainder of the 2021 increase is attributable to the hot and dry summer w, as well as the effects of COVID which shifted water consumption from the commercial customer class to the residential class, which has much higher rates than the commercial class.

Table 2.2.6-1
Return on In-City Water Share of Mid-Year Rate Base (\$ millions)

		Α	В	С	D
		20	21	2017-	-2021
	Return on Rate Base	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Net Mid-Year Rate Base	1,392.0	1,430.2		
2	In-City Water Share - %	79.0%	77.8%		
3	In-City Water Share - \$	1,099.6	1,113.1		
4	Deemed Capital Structure				
5	Debt (%)	60.00%	60.00%		
6	Equity (%)	40.00%	40.00%		
7	Cost of Capital				
8	Cost of Debt	4.82%	4.45%	4.86%	4.73%
9	Cost of Equity	10.18%	11.46%	10.18%	10.12%
10	Weighted Average Cost of Capital (WACC)	6.96%	7.25%	6.99%	6.89%
11	Return on Mid-Year Rate Base				
12	Return on Rate Base Financed by Debt	31.8	29.7	146.5	143.2
13	Return on Rate Base Financed by Equity	44.8	51.0	204.5	204.1
14	Total Return on In-City Water Rate Base	76.5	80.7	351.0	347.4

Although the net mid-year rate base is 2.8% greater than forecast, In-City Water's share of rates base is 1.2% less than forecast. The lower In-City share of rate base is attributable to higher than forecast asset additions for fire protection-related assets (hydrants), offset by an increase in In-City Water's demands on water system relative to that of Regional Customers.

Return on rate base is calculated separately for the debt-financed and equity-financed portions of In-City Water's net rate base. The rate of return on debt is equal to the embedded cost of debt for EWSl's total water system, as calculated in Table 2.2.6-2 below:

Table 2.2.6-2
Interest Expense and Cost of Debt
(\$ millions)

		Α	В	С	D	
		20:	21	2017-2	2021	
	Interest Expense and Cost of Debt	PBR		PBR		
		Forecast	Actual	Forecast	Actual	
1	Interest expense					
2	Interest on short-term debt	1.0	1.0	4.8	4.9	
3	Interest on City of Edmonton debentures	0.2	0.2	2.8	2.8	
4	Interest on intercompany debentures	38.2	35.9	174.9		
					169.8	
5	Total interest expense	39.4	37.1	182.5		
					177.4	
6	Mid-year debt and other long-term liabilities					
7	Mid-Year Short-term debt	34.9	23.7			
8	Mid-Year Long-term debt	781.2	808.7			
9	Mid-Year Other Long-term liabilities	1.8	2.1			
10	Total mid-year debt and other long-term liabilities	817.9	834.5			
11	Embedded Cost of Debt	4.82%	4.45%	4.86%	4.73%	

The embedded cost of debt is lower than forecast in 2021. Although, EWSI issued more long term debt than forecast, which is more expensive that short term debt, due to favorable economic conditions EWSI was able to issue the long term debt at lower than forecast rates over the 2017 to 2021 period.

2.2.7 Transactions with Affiliates

In-City Water derives a significant proportion of its revenue and expenses from transactions with affiliates, including the City of Edmonton, EUI and its subsidiaries, and other EWSI business units. Table 2.2.7 provides a summary of In-City Water's 2021 actual and forecast transactions with affiliates.

Table 2.2.7
Transactions with Affiliates
(\$ millions)

		Α	В	С	D
		20	21	2017-	-2021
	Affiliate and Service	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Revenues from the provision of services to the City				
	of Edmonton				
2	Public Fire Protection	12.6	12.4	58.8	58.3
3	Water sales	3.4	2.4	16.5	14.8
4	Other	0.2		1.1	0.1
5	Total	16.3	14.8	76.4	73.2
6	Services provided by (recovered from):				
7	City of Edmonton				
8	Franchise Fees	16.9	16.6	79.0	75.8

		Α	В	С	D
		20		2017-	
	Affiliate and Service	PBR		PBR	
	7 illinate and Service	Forecast	Actual	Forecast	Actual
9	Property Taxes	0.5	0.7	2.2	1.9
10	Interest on City of Edmonton Debentures	0.2	0.2	2.8	2.8
11	Mobile equipment services	2.0	1.6	9.6	10.8
12	Other services	1.4	0.0	6.8	2.3
13	Meter Reading Recoveries			-	(1.4)
14	Total	21.0	19.2	100.5	92.1
15	EPCOR Utilities Inc.				
16	Corporate Shared Service Costs	16.2	13.5	78.0	62.6
17	Interest on Intercompany Debentures	38.2	35.9	174.9	169.8
18	Interest on Short-term debt	1.0	1.0	4.8	4.9
19	Other Services		0.4	-	1.3
20	Total	55.4	50.4	257.8	238.6
21	EPCOR Distribution and Transmission Inc.				
22	Meter Reading Recoveries	-	(0.0)	-	(0.6)
23	Other services	0.1	0.0	0.7	0.0
24	Total	0.1	(0.0)	0.7	(0.5)
25	EPCOR Technologies Inc.				
26	Hydrovac Charges and Space Rentals	0.9	1.0	4.5	7.0
27	Other Services (Recoveries)		(0.1)	-	(0.3)
28	Total	0.9	1.0	4.5	6.7
29	EPCOR Energy Alberta LP				
30	Customer Billing and Collection Services	9.1	8.5	42.1	41.3
31	Meter Data Management			-	8.0
32	Trouble Call Support Services		0.6	-	
33	Total	9.1	9.1	42.1	42.1
34	EPCOR Power Development				
35	Other Services (Recoveries)		(0.2)	-	(8.0)
36	EPCOR Commercial Services		,		` '
37	Commercial Services Rent Recoveries	-	0.0	-	(0.7)
38	Other EWSI Business Units				, ,
39	EWSI Shared Services Allocation	10.7	11.1	51.2	49.5
40	Water Sales to Wastewater	(0.4)	(0.5)	(1.9)	(2.2)
41	Meter Reading Recoveries from Wastewater	(2.5)	(2.2)	(11.5)	(11.6)
42	Meter Reading Recoveries from Drainage Services	(2.5)	(2.2)	(11.5)	`(9.9)
43	Customer Service Fees from Drainage Services	,	,	,	` 0.9
44	Other Services provided to Drainage Services		(0.3)		(8.0)
45	Meter Reading Recoveries from Other EWSI		,		(0.1)
	Business Units				, ,
46	Quality Assurance Lab Testing and Other Services		0.0		0.2
	from Other EWSI Business Units				
47	Drainage Services Rent (Recoveries)		(0.3)		
48	Total	5.2	5.7	26.3	26.2
49	Expenditures on capital projects arising from	0.2	0.1	20.0	20.2
'0	services provided by:				
50	City of Edmonton	3.3	2.8	15.9	5.7
51	EPCOR Technologies Inc.	4.2	7.5	19.9	26.0
52	EPCOR Utilities Inc.	r. ८	0.9		6.0
53	EPCOR Drainage Services		3.7	_	12.7
54	EPCOR Distribution and Transmission Inc.	0.1	0.3	0.6	1.5
55	Other EPCOR Business Units	0.1	0.1	-	0.3
	California Date Date Date Date Date Date Date Dat	1	5.1	l .	0.0

			Α	В	С	D
			20	21	2017-	-2021
		Affiliate and Service	PBR		PBR	
			Forecast	Actual	Forecast	Actual
56	Total		7.5	15.1	36.3	52.2

2.3 Capital Programs

2.3.1 Capital Expenditures

Table 2.3.1 compares approved capital expenditures from the PBR forecast to actual capital expenditures for 2021 for each project with approved or forecast capital expenditures in excess of \$5.0 million over the 2017-2021 PBR term, as well as for each project category. Table 2.3.1 also provides a comparison of total 2017-2021 approved capital expenditures to EWSI's current capital forecast.

Table 2.3.1
Capital Expenditures
(\$ millions)

		Α	В	/ c	D	Е	F	1
			2021			2017-20	-	
		PBR	Actual	Difference	PBR	Actual	Difference	
1	Regulatory							
2	Water Services Replacement and Refurbishment	2.1/	4.6	2.5	10.2	15.3	5.2	1
3	Accelerated Lead Service Replacement Program (NRA)	2.3	3.8	1.5	5.9	6.3	0.3	
4	Phosphoric Injection for Lead Control (NRA)		3.9	3.9	9.8	6.2	(3.6)	2
5	Projects < \$5M	0.3	0.3	(0.1)	1.5	1.9	0.5	
6	Sub-total	4.7	12.6	7.9	27.4	29.7	2.4	
7	Growth/Customer Requirements							
8	LRT Relocates (NRA)	6.0	7.8	1.8	24.9	29.7	4.8	3
9	Network PD Transmission Mains	4.0	7.2	3.1	14.4	26.1	11.7	4
10	Water Service Connections	5.4	6.2	0.9	23.6	28.1	4.5	5
11	WM Cost Sharing Program	0.9	0.4	(0.4)	3.0	6.6	3.6	6
12	Distribution System Modifications	1.0	3.8	2.7	6.0	9.6	3.5	7
13	Private Development Construction Coordination	3.6	2.7	(0.9)	15.4	13.1	(2.3)	8
14	New Meter Purchases and Installations	3.1	2.0	(1.1)	13.2	11.0	(2.2)	9
15	New Water Distribution Mains/DM	1.8	1.8	(0.0)	8.8	10.3	1.5	
16	Discovery Park Reservoir and Annexation Pipeline (NRA)	-	0.2	0.2	9.2	9.7	0.5	
17	Projects < \$5M	0.2	2.0	1.8	2.6	8.5	5.9	10
18	Sub-total	26.1	34.2	8.1	121.2	152.7	31.5	
19	Health, Safety and Environment							
20	Solar Power Systems and Battery Energy Storage System	-	18.0	18.0	-	19.4	19.4	11
21	Stage 2 and 3 Filter Conversion to Deep Bed	10.7	-	(10.7)	22.3	0.4	(22.0)	12
22	Projects < \$5M	1.2	0.2	(1.0)	4.3	3.2	(1.1)	

PBR 2017-2021

EPCOR Water Services Inc.

		Α	В	С	D	Е	F	1
			2021			2017-20		
		PBR		Difference	PBR	Actual	Difference	
23	Sub-total	11.9	18.2	6.3	26.6	22.9	(3.7)	
	Reliability and Life Cycle Improvements							
25	Obsolete Valve Replacements	0.9	4.0	3.1	4.1	13.0	8.9	13
26	Chemfeed Upgrade Program - Rossdale	0.7	1.4	0.7	4.0	9.2	5.2	14
27	Chemfeed Upgrades Program - E.L. Smith	0.5	2.4	1.9	4.0	9.1	5.1	15
28	Obsolete Hydrant Replacements	0.9	1.3	0.4	4.4	9.1	4.7	16
29	E.L. Smith Bypass Main (Ring Main)	-	5.4	5.4	7.0	11.6	4.6	17
30	Water Main Reactive Renewal Program	13.5	13.0	(0.6)	54.7	58.9	4.2	18
31	Filter Underdrain Upgrades - Rossdale	-	0.0	0.0	4.7	8.1	3.4	19
32	Network Valve Chamber Refurbishment	1.2	2.2	1.0	5.6	7.9	2.3	20
33	E.L. Smith HVAC Upgrades Program	0.5	0.2	(0.3)	3.4	5.1	1.7	
34	Mechanical Reliability Program - E.L. Smith	8.0	0.5	(0.3)	4.9	6.3	1.4	
35	Rossale C1-2 Clarifier Upgrade	-	-	-	4.3	5.5	1.1	
36	Vehicle & Fleet Additions	1.7	2.4	0.7	11.8	11.9	0.1	
37	Water Meter Change Outs	6.6	1.2	(5.4)	25.6	12.1	(13.5)	21
38	Water Main Proactive Renewal Program	3.8	(0.0)	(3.8)	18.0	15.0	(3.0)	22
39	Reservoir Cell and Pumphouse Roof Replacement Program	1.5	2.0	0.6	6.3	3.6	(2.7)	23
40	Reservoir Electrical Upgrades Program	1.2	0.3	(0.9)	5.3	2.7	(2.6)	24
41	Plant Electrical Upgrades Program	1.5	0.3	(1.1)	5.2	3.9	(1.3)	
42	Transmission Mains Replacement/ Refurbishment	2.9	1.7	(1.2)	13.3	12.2	(1.1)	
43	SCADA System Upgrade Program	0.7	1.1	0.4	5.7	4.8	(0.9)	
44	Projects < \$5M	11.9	24.0	12.1	70.0	87.2	Ì7.2	12,25
45	Sub-total	50.7	63.4	12.6	262.4	297.3	34.9	1
46	Performance, Efficiency and Improvement							
47	Water Main Cathodic Protection Program	4.4	4.2	(0.2)	21.0	18.8	(2.2)	26
48	Water D&T Facility	_	2.2	`2.2	16.0	14.9	(1.1)	27
49	Projects < \$5.0 million	0.3	0.3	(0.0)	7.1	3.4	(3.7)	28
50	Sub-total	4.7	6.7	2.0	44.1	37.1	(7.0)	1
51 /	Accelerated						, ,	
52	Accelerated Fire Protection Program/DM	2.6	1.4	(1.3)	15.9	10.0	(5.9)	29
53	Accelerated WM Renewal Program	10.9	1.9	(8.9)	51.9	43.7	(8.2)	30
54	Sub-total	13.5	3.3	(10.2)	67.8	53.7	(14.2)	1
_	Capital Expenditures before Contributions	111.7	138.4	26.7	549.6	593.4	43.8	1
	Contributions							1
57	Water Services Connections Contribution	(5.4)	(3.7)	1.6	(23.6)	(17.3)	6.2	5
58	Private Development Contribution	(0.5)	(0.1)	0.4	(1.9)	(1.0)	0.9	
59	New Water Distribution Mains Contribution	(1.8)	(1.9)	(0.1)	(8.8)	(9.1)	(0.2)	

	Α	В	С	D	Е	F
		2021			2017-20	21
	PBR	Actual	Difference	PBR	Actual	Difference
60 Sub-total	(7.7)	(5.7)	2.0	(34.3)	(27.4)	6.9
A 1/1 F 11/1	404.0	400 =	20.	-4-0		
Capital Expenditures	104.0	132.7	28.7	515.3	566.0	50.8

^{*} Amounts include capital expenditures approved through Non-Routine adjustments (see Section 1.5).

Explanations for differences between PBR forecast capital expenditures for 2017 to 2021 in excess of \$2.0 million on individual projects with total costs in excess of \$5.0 million, as well as for project categories in aggregate include:

- 1. Water Services Replacement/Refurbishment \$5.2 million (51%) greater than forecast. This program includes relocation of water service lines that do not meet current servicing standards, reactive replacements of service box and components, and customer-initiated lead service replacements (EPCOR portion of water service lines only). The increased expenditure in the 2017-2021 PBR term is primarily due to a higher than expected number of services qualifying for replacements combined with the increased capitalization of replacement costs that were previously expensed.
- 2. **Phosphoric Injection for Lead Control -** \$3.6 million less than forecast (see section 1.5) due to delays in project completion. This project is now expected to be completed in 2023.
- 3. **LRT Relocates** \$4.8 million (19%) greater than forecast (see section 1.5). Changes to track alignments, as well as the accelerated construction schedule for the West Valley Line LRT project resulted in increases to the projected costs of the required utility relocations.
- 4. Network Private Development Transmission Mains \$11.7 million (81%) greater than forecast. This program represents the reimbursement of the costs incurred by private developers to extend the transmission network (450 mm and larger in diameter) to new subdivisions. Since developers determine both the timing of projects and the areas to be developed, expenditures on this program have proven difficult to forecast. Significant additions to this program include transmission main projects for Fort Road (66 Street), 199 Street 23 to 35 Avenue, and Maskekosikh Trail. EWSI continues to work with developers to identify their upcoming subdivision plans to better predict the program cost.
- 5. Water Services Connections, before Contributions \$4.5 million greater than forecast. This program provides for the construction of new water services for infill developments and redevelopments and for recovery of these costs from private developers. Although recovery is intended to fully cover EWSI's costs, only 62% of total program costs have been fully recovered over the 2017-2021 term. Actual program costs over the 2017-2021 term were \$28.1 million, as opposed to the \$23.6 million forecast. Meanwhile, recovery was \$17.3 million, as opposed to the \$23.6 million forecast. Thus, after accounting for all program costs, service application rates over the 2017-2021 PBR term provided for recovery of 62% of total program costs, resulting in \$10.8 million in unrecovered costs to EWSI. EWSI has updated the service connection charges fee schedule in the 2022-2026 PBR Application, so that fees are based on the cost of service for each service connection. This change is intended to ensure that EWSI will fully recover water service connection costs from developers.
- 6. Water Main Cost Sharing—\$3.6 million (119%) greater than forecast. This program provides private developers with a partial rebate for the construction of water mains 300 to 400 mm in diameter. Similar to Network Private Development Transmission Mains, the costs of this program are driven by developer activity. The increase in the costs of this program result from higher than forecast developer activity during the PBR term.
- 7. **Distribution System Modifications** \$3.5 million (59%) greater than forecast. This program includes relocating or modifying existing water mains and appurtenances to eliminate conflicts arising from City of Edmonton projects, primarily related to road or sidewalk widening. The increase in

- program expenditures primarily relates to neighborhood renewals and transportation projects, which were unforeseen in prior years.
- 8. **Private Development Construction Coordination -** \$2.3 million (15%) less than forecast due to efficiencies achieved in drawing reviews and inspections.
- 9. **New Meter Purchase/Installation** \$2.2 million (17%) less than forecast. The purpose of this program is to comply with the Bylaw, which requires that all water consumed by customers must be metered. The decreased program costs relate primarily to lower activity during the COVID-19 pandemic period, during which home visits have been minimized.
- 10. **Growth and Customer Requirements < \$5.0 million** \$5.9 million (231%) greater than forecast. The increase in this category includes the unbudgeted Laurel Booster Station project needed to address development in a high elevation area (\$1.7 million), as well as additional costs to acquire water mains from the Capital Region Northeast Water Service Commission following city expansion and annexation (\$2.7 million). The remainder of the variance is attributable to higher than forecast capital expenditures in other growth projects.
- 11. E.L. Smith Solar Farm (now the kīsikāw pīsim Solar Farm) and Battery Storage (net of contributions) \$19.4 million (new projects). As noted in Section 2.3.2, instead of purchasing locally produced renewable power at an annual cost of \$1.9 million, EWSI is constructing a solar farm at E.L. Smith, which is expected to generate 21,500 MWh of renewable electricity annually. The solar farm also includes a battery energy storage system that is largely grant-funded. The solar farm is expected to be fully commissioned in 2022.
- 12. **Deep Bed Filtration Conversion E.L. Smith** \$22.0 million (99%) less than forecast and **Structural Rehabilitation Program E.L. Smith** \$4.7 million (10%) greater than forecast. During engineering inspections in 2018, EWSI identified immediate needs for structural rehabilitation of the E.L. Smith Stage 1 and Stage 2 filter plenums (12 filters in total). Accordingly, the conversion to deep bed has been postponed to the 2032-2036 PBR term so that the required structural rehabilitation and upgrades can be completed first.
- 13. **Obsolete Valve Replacement** \$8.9 million (216%) greater than forecast. Higher than expected rates of deterioration, requiring adjustments to valve replacement schedules. Although the projected cost of this program has increased substantially, improving overall valve operability in the system reduces isolation time, lessens the potential for property damage and mitigates customer impacts during emergency main break response.
- 14. **Chemfeed Upgrades Rossdale** \$5.2 million (129%) greater than forecast. EWSI identified significant health, safety and environmental needs, requiring extensive upgrades to the sodium bisulphite room, which accounts for the majority of the program overage during the current PBR term.
- 15. **Chemfeed Upgrades E.L. Smith** –\$5.1 million (127%) greater than forecast. Higher than estimated costs for a significant fluoride room upgrade to replace end-of-life equipment, and unanticipated upgrades to the sodium hypochlorite room, including new generation cells, are the primary factors contributing to the increase in the costs of this program.
- 16. **Obsolete Hydrant Replacement** \$4.7 million (107%) greater than forecast. Similar to the obsolete valve replacement program, higher than expected rates of deterioration have led to increased backlog, requiring adjustments to hydrant replacement schedules. EWSI has adjusted its hydrant replacement schedule to clear backlogs and ensure fire protection service levels are maintained.

17. **E.L. Smith Bypass Main (Ring Main)** – \$4.6 million (65%) greater than forecast. The scope of this project includes the construction of a new bypass primary feeder to help ensure redundancy and uninterrupted service to North and West Edmonton. In 2019, a historical resource impact assessment confirmed the presence of cultural materials within the proposed construction area, requiring archaeological mitigation, and increasing total project costs. Further design also identified the requirement for additional manual isolation valves to improve operational flexibility and isolation redundancy.

- 18. Water Main Reactive Renewal \$4.2 million (8%) greater than forecast. Actual-to-forecast variances for this program generally correlate with the number of main breaks occurring, which is dependent upon weather conditions. Although the ongoing decrease in cast iron water main breaks has resulted in a decrease in the total length of candidates to be replaced, the unit cost of construction for water main replacements has increased due to changes in the City's road restoration standards, increased traffic accommodation requirements, and an increase in transmission mains (350 mm or larger) that qualify for replacement.
- 19. **Filter Underdrain Upgrades Rossdale** \$3.4 million (72%) greater than forecast. Both the scope and cost of this project have increased following an inspection of the filter underdrain system that identified unforeseen needs for upgrades to air scour systems, combined with an unexpected increase in the price of steel.
- 20. **Network Value Chamber Refurbishment** \$2.3 million (41%) greater than forecast due to higher than anticipated number of critical valve replacements required during the 2017-2021 PBR term
- 21. Water Meter Change Out— \$13.5 million (53%) less than forecast. The decrease in cost of this program is primarily due to the actual lives of the batteries used in the Automatic Meter Reading (AMR) devices exceeding their manufacturer-estimated lives of 12 years. Based on manufacturer's useful life, it was expected that the first significant replacement of first generation AMR devices would occur in 2019; however, due to the increase in useful life noted on the AMR batteries, the first significant year of replacement has been extended to coincide with the initiation of the AMI Deployment Project in 2023. As a result, fewer meters were replaced during the 2017-2021 term.
- 22. Water Main Proactive Renewal \$3.0 million (16%) less than forecast. This project is very closely tied to Reactive Renewal and includes replacements or upgrades of water mains in older areas where water mains do not conform to current design standards for water quality, fire protection, and system reliability.
- 23. **Reservoir Cell and Pumphouse Roof Replacement** \$2.7 million (43%) less than forecast. The decreased program expenditures primarily relates to changes in the scope of this program, which has resulted in reclassifying reservoir roof replacement projects to the Reservoir Structural Upgrades Project. This change allows for more efficient project delivery and improvements to project management and coordination. In addition to reclassifying, scope was further reduced on this program when Rossdale Cell 1 was pulled out as a standalone project.
- 24. **Reservoir Electrical Upgrades** \$2.6 million (49%) less than forecast due to reprioritization of other higher priority water plant projects during the 2017-2021 PBR term.
- 25. **Reliability and Life Cycle Improvements < \$5.0 million** \$17.2 million (25%) greater than forecast. The increase in this category result primarily from the combination of the increased scope of the Rossdale stilling basin upgrade project (\$3.0 million); accelerated roof and structural upgrades to

Rossdale Reservoir Cell #1 (\$4.0 million) and unbudgeted filter upgrade work at E.L. Smith (\$9.0 million). These increases were offset by the deferral of lower priority Rossdale roof replacements (\$2.0 million) and E. L. Smith electrical upgrades and a significant portion of the E.L. Smith High Lift Pump #5 upgrades to the next PBR term (\$6.7 million). The remaining increase was related mainly to other annual water treatment plant programs required to rehabilitate or replace on a life-cycle basis. Within each of these programs, the most critical work was prioritized for completion within the current PBR term and deferrable projects were rescheduled for future terms.

- 26. Water Main Cathodic Protection \$2.2 million (11%) less than forecast. The reduction in the costs of the program result from adoption of more efficient anode installation processes combined with delays attributable to the ongoing COVID-19 pandemic.
- 27. Water D&T Facility Expansion (now Real Estate Consolidation Project) \$1.1 million (10%) less than forecast. Completion of the D&T Facility was originally planned for 2017. This project has been re-scoped following the transfer of Drainage to EPCOR and the completion of an EPCOR-wide real estate review. The review concluded that a consolidated solution for Water and Drainage would provide long-term synergies and operational efficiencies that would outweigh the additional capital costs. In August 2021, EWSI finalized the purchase of a developed property on Aurum Road in North East Edmonton, which is ideally suited to EWSI long term needs. Site renovations will be required before large scale moves can occur in 2023 and are included within the projected capital expenditure overage for this project. The costs for the project have been allocated 40% to Water Services and 60% to Drainage Services based on estimated headcount. The project is now expected to be completed in 2023 and is forecasted to incur \$18.0 million in capital expenditures during the 2022-2026 term.
- 28. **Performance Efficiency and Improvement Projects < \$5 million** \$3.7 million (52%) less than forecast, primarily due to the \$2.5 million in savings from the Hydraulic Debottlenecking Project capex which reduced flow restrictions in the UV effluent flume and increased the overall hydraulic capacity of the plant to an acceptable level. The remainder of the difference consists of smaller variances, none of which are individually significant.
- 29. **Accelerated Fire Protection** \$5.9 million (37%) less than forecast. The expenditures within this program are less than approved due to a smaller number of potential sub-projects meeting the Accelerated Fire Protection Program criteria. A portion of the funding was allocated to the Infill funding program which was developed in conjunction with IDEA and the City of Edmonton to help offset the costs of infrastructure upgrades in infill areas. In addition, funding was allocated to critical work identified in areas such as the Distribution System Modifications for City-driven relocates and Transmission Main work where expenditures exceeded PBR forecast.
- 30. **Accelerated Water Main Renewal** \$8.2 million (16%) less than forecast. The expenditures within this program are largely dependent upon the City paving program plans and the water main break frequency. Lower than forecast actual costs are primarily due to reprioritization of other more critical lifecycle and reliability programs.

2.3.2 Construction Work in Progress

In-City Water's rate base consists of plant in service. If a capital project is not completed (i.e. not placed into service) in the year, the capital expenditures on that project remain in Construction Work in Progress

and are excluded from the rate base. In 2021, as shown on Table 2.3.2, the balance in Construction Work in Progress was \$62.9 million greater than forecast.

Table 2.3.2
Construction Work in Progress
(\$ millions)

		Α	В	С	D	
			1	2017-2021		
	Construction Work in Progress	PBR		PBR		
			Actual	Forecast	Actual	
	Balance, beginning of period	11.8	27.2	0.3	3.8	
2	Capital Expenditures	97.9	132.7	475.8	566.0	
3	Capital Additions	(109.5)	(96.8)	(475.8)	(506.5)	
4	Balance, end of period	0.2	63.1	0.2	63.1	

The PBR plan allows EWSI to capitalize the costs of financing certain projects remaining in Construction Work in Progress, using an allowance for funds utilized during construction (AFUDC). In 2021, AFUDC included in capital expenditures on eligible projects amounted to \$2.5 million, compared to the PBR forecast amount of \$0.6 million.

2.4 Operational Performance

2.4.1 Water Quality Index

The Water Quality index is calculated as the percentage of water quality test results that meet EWSI's internal water standards. Water quality standards are established by both the federal and provincial governments and are incorporated into EWSI's Approval to Operate from Alberta Environment and Parks (AEP). In some cases, EWSI sets even stricter limits for critical parameters that are identified in EWSI Quality Standards, to provide early warnings of potential water quality problems; so that corrective actions can be taken before external standards are not met.

Table 2.4.1
Water Quality Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index
Water Quality Index	The percentage of the total number of water quality tests taken in the period that do not yield suspect results	≥ 99.7	99.7	1.000
		A۱	verage Index	1.000
		Index Sta	ndard Points	25.0
Total Actual Points				25.0
Maximum Available Points Including Bonus Points				
		Total Po	ints Earned	25.0

2021 Highlights

• Water Quality Index: During the year, EWSI collected and tested 60,644 samples of treated drinking water, of which only 159 (0.3%) did not meet EWSI internal water quality standards. EWSI met Health Canada's Drinking Water Quality Guidelines and Alberta Environment and Parks' water quality testing requirements in 2021 for all but 3 samples.

2022 Areas for Improvement

Water Quality Index: Increases in turbidity and/or decreases in chlorine concentrations, can be partly
explained by changing water consumption patterns resulting from the COVID-19 pandemic. In 2022,
as part of EWSI's pandemic response to changing consumption patterns we continued to
communicate to large facility owners, encouraging them to flush their building's plumbing systems
when experiencing low occupancy.

2.4.2 Customer Service Index

The customer service index is a composite measure of the customers' perception of satisfaction with EWSI service, the aesthetic quality of water and speed of response to customer issues.

Table 2.4.2
Customer Service Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index
Post Service Audit Factor	The percentage of the customers responding as "completely" or "very satisfied" in the level of service received from the EWSI Emergency group.	≥ 74.9	72.2	0.963
Home Sniffing Factor	The percentage result of customer satisfaction for the home sniffing survey.	≥ 94.4	96.0	1.017
Response Time Factor	The average number of minutes needed to confirm a water main break from the time a call is received at EWSI's dispatch office.	≤ 25.0	19.4	1.225
Planned Construction Impact Factor	The percentage of the total planned construction events where EWSI complies	≥ 95.8	97.4	1.017

with required construction notification procedures.		
Average Index	1.056	
Index Standard Points		
Total Actual Points		
Maximum Available Points Including Bonus Points		
Total Points Earned	21.1	

2021 Highlights

- Post Service Audit (PSA) Factor: In 2021, EWSI continued to focus on enhancing the customer experience. In addition to increased call reviews, EWSI held group sessions with the various teams that interact with customers to improve customer satisfaction. As a result of these efforts, the PSA showed improvement compared to previous years.
- Home Sniffing Factor: An especially mild spring runoff season during 2021 allowed taste and odour issues to be managed effectively so that a 96.0% customer satisfaction rating was achieved, well above the 94.4% target. Special care was exercised to ensure that the home sniffers' distribution represented all areas of the City, to encourage timely (same day) submission of observations, and to encourage participants to stay involved throughout the full monitoring period. A major improvement over previous years was having continuous, near real-time home sniffing results available as feedback to water plant operators.
- Response Time Factor: EWSI continued to exceed the Response Time Factor through efficient dispatching of crews. Crews are typically assigned to quadrants of the city which provide efficient dispatching of those crews to main breaks.
- Planned Construction Impact Factor: On-going training and improvements to construction coordination and communication plans resulted in performance exceeding the PBR standard.

2022 Areas for Improvement

- Home Sniffing Factor: Timeliness of data entry will be improved by imposing a two-day response cut-off so that only entries within that time-frame will be accepted. Any interruptions to automated data transmission will also be handled in a consistent manner, so that manual interventions are readily traceable.
- Response Time Factor: EWSI will continue to improve response time by implementing new
 procedures and identifying additional resources to respond to main breaks and to support shut down
 processes. A new Emergency Support Team has been identified that includes related employee
 positions that simultaneously respond to main breaks.
- **Planned Construction Impact Factor:** Training and construction processes will continue to be reviewed to minimize impacts of planned construction activities.

2.4.3 System Reliability and Optimization Index

The System Reliability Index is a measure of the confidence that customers can place in the reliability of the waterworks system.

Table 2.4.3

System Reliability and Optimization Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index
Water Main Break Factor	Main Break Factor The number of water main breaks that occurred in the reporting period. ≤ 419 305		1.272	
Water Main Break Repair Duration Factor	The percentage of water main breaks repaired and confirmed by EWSI within 24 hours from the time that the flow of water is shut off, excluding main breaks on arterial or collector roads.	≥ 93.7	95.8	1.022
Water Loss Factor	The Infrastructure Leakage Index, a performance indicator quantifying how well a water distribution system is managed for the control of "real" water losses (i.e. leakage).	≤ 2.00	0.90	1.550
System Energy Efficiency Factor	The energy used at all water facilities in kWh divided by the average annual water production per residential customer account (ML/kWh/customer).	≤ 309	245	1.263
Average index				1.277
Index Standard Points			25.0	
Total Actual Points			31.9	
Maximum Available Points Including Bonus Points Total Points Earned				28.5
Total Points Earned				28.5

2021 Highlights

- Water Main Break Factor: EWSI experienced 305 main breaks in 2021. Although this was an
 increase over the previous year, the result remains within the PBR standard, and was due to
 variations in weather and temperature.
- Water Main Break Repair Duration Factor: In 2021, 95.8% of main breaks were repaired within 24 hours which exceeded the PBR standard of 93.7%. When water main break repairs approached 20 hours in duration, additional communication was provided to impacted customers. In addition, EWSI provided temporary water supply via water tanks, hose hook ups, or delivery of water jugs to affected customers. When possible, additional crews were called in overnight to continue repairs to reduce impacts to customers.
- Water Loss Factor (ILI): EWSI's Infrastructure Leakage Index (reported for 2020) of 0.90 exceeded the PBR standard of 2.00.
- System Energy Efficiency Factor: EWSI exceeded the energy efficiency target in 2021 and implemented several energy efficiency improvements and GHG reductions, including:

- Completion of an energy audit to identify baseline and improvement opportunities for water treatment plant and reservoir operations.
- o On-going implementation of office and pump station off-hour temperature control programs.
- On-going implementation of building envelope energy efficiency programs to reduce GHG emissions.

High temperatures late June and early July of 2021 also increased water consumption which in turn improved treatment process and water distribution efficiencies.

2022 Areas for Improvement

- Water Main Break Factor: Capital spending during 2022 will be allocated to projects for the prevention of high consequence main breaks through a new annual transmission main inspection program.
- Water Main Break Repair Duration Factor: EWSI continues to review its processes for mobilization of equipment and crews to ensure minimal impacts of organizational changes to repair timelines.
- Water Loss Factor (ILI): An ILI of 0.9 is considered extremely good for a water utility. Through continuous improvement, EWSI will continue to explore options to further quantify and validate inputs as well as to identify and minimize water loss.
- **System Energy Efficiency Factor:** In 2022, EWSI will continue with several key energy efficiency initiatives which will include:
 - Complete Energy Audit Phase I and II to draft a road map for GHG emission reductions for water treatment plant and reservoir operations.
 - Review major capital projects for GHG emission reductions related to the federal Low Emission Economy Grant. If approved, implementation would be planned to be completed in early 2025.
 - As an industrial leader in sustainable utilities of the future, EWSI will share knowledge of net zero emission reduction strategies and energy efficiency improvement experiences with other utilities in professional organizations.
 - Continue with current building envelope energy efficiency programs to reduce GHG emissions.

2.4.4 Environment Index

The environmental index measures the success of programs and policies designed to mitigate and report adverse environmental impacts.

Table 2.4.4 Environmental Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index
Water Conservation Factor	The actual 10 year rolling average monthly Edmonton residential consumption per household.		15.0	1.145
Environment Incident Factor	Incident The number of reportable and preventable environmental incidents. ≤ 6		3	2.000
Solids Residual Management Factor	The average number of days that the Rossdale and E.L. Smith water treatment plants are operating in direct filtration mode.	≥ 120	131.0	1.092
Average index				1.412
Index Standard Points				15.0
Total Actual Points			21.2	
Maximum Available Points Including Bonus Points			16.5	
Total Points Earned			16.5	

2021 Highlights

- Water Conservation Factor: Similar to much of 2020, the COVID-19 pandemic continued through 2021 and residential consumption per customer continued to remain elevated because of people spending more time at home. In addition to higher indoor residential consumption, seasonal or outdoor consumption was much higher than normal due to lower than usual precipitation and higher average temperatures over the summer months. Despite the COVID-19 pandemic, the actual Water Conservation Factor was still well below the standard. This is attributable to historical and ongoing changes in water usage habits and technology improvements resulting in efficient appliances and toilets.
- Environment Incident Management Factor: For 2021, there were four reportable environmental incidents pertaining to water distribution and transmission operations. Three related to bacteriological sample failures while the fourth related to a drainage wastewater release. A root cause investigation was carried out for each incident. Three events were determined to be preventable (two bacteriological samples resulting from equipment failure and the drainage wastewater release when a valve on a lift station was closed in error). These investigations provided information that resulted in improvements to maintenance and operating procedures.
- Solids Residual Management Factor: The water treatment plants successfully operated in direct
 filtration an average of 131 days in 2021, exceeding the target of 120 days. As a result, total solids
 discharged to the North Saskatchewan River during the winter months (January, February, November
 and December) were reduced by 52% relative to baseline conventional treatment.

2022 Areas for Improvement

- Environment Incident Management Factor: During 2022 there will be a continued focus on environmental and public health significant incident investigations that will be targeting root cause identification and tracking of corrective actions to completion.
- Solids Residual Management Factor: EWSI will continue to optimize chemical dosing and other
 operating strategies for direct filtration, with the goal being to minimize solids discharged to the North
 Saskatchewan River.

In December 2021, EWSI submitted a proposed Wastestream Monitoring Program to Alberta Environment and Parks for review and approval. The proposed plan will build on previous assessment work, further quantifying residuals discharged to the river and their impacts, and will help inform future residual management strategies.

2.4.5 Safety Index

The safety index is a measure of the success of programs and the application of policies that maximize the safety of employees and the public.

Table 2.4.5 Safety Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index
Near Miss Reporting Factor	The number of near miss reports entered in the ERS system.	≥ 550	748	1.360
Work Site Inspections and Observations Factor	·		3919	3.797
Lost Time Frequency Factor	The actual lost time frequency rate.	≤ 0.57	0.00	2.000
All Injury Frequency Factor	The actual all injury frequency rate	≤ 1.54	0.81	1.899
Average index				2.264
Index Standard Points				15.0
Total Actual Points				34.0
Maximum Available Points Including Bonus Points				16.5
Total Points Earned			16.5	

2021 Highlights

- **Near Miss Reporting Factor:** Near miss and hazard identification reporting continued to be an effective means to proactively identify hazards and implement corrective actions to mitigate potential harm to employees, contractors and members of the public.
- Work Site Inspections / Observations Factor: Work site inspections and observations continued to be a successful leading indicator that provided leadership and employees the opportunity to

engage in field activities, proactively identify areas of improvement, and verify conformance to EWSI standards

- Lost Time Frequency Rate Factor: In 2021, EWSI exceeded the lost time frequency rate factor by having no lost time events.
- All Injury Frequency Rate Factor: In 2021, EWSI had 6 recordable incidents. Three were related to musculoskeletal strains. The remaining three were due to an insect bite, a crush injury and an electrical shock.

2022 Areas for Improvement

- Near Miss Reporting Factor: With consideration of the reintegration back into the workplace in 2022, there will be a continued focus on the reporting of near miss and hazard identification events.
 A Mind on Task initiative will drawn attention to the need to focus on mitigating hazards before an event occurs.
- Work Site Inspections / Observations Factor: With consideration of the reintegration back into the workplace in 2022, EWSI will continue to monitor inspection and observation activities and support proactive field engagements.
- Lost Time Frequency Rate Factor/All Injury Frequency Rate Factor. EWSI will continue to review investigation information for causal themes. This will assist in the identification of future direction for communications and activities related to addressing root causes.

2.5 Rates and Bill Comparisons

Water bill comparisons for 2021 are based on the published water rates for Calgary, Vancouver, Winnipeg and Regina, as well as four local communities. These bill comparisons represent the total cost to the customer and include fixed charges, consumption charges and any other applicable surcharges.

2.5.1 Residential Water Bills

Figure 2.5.1 provides a comparison of residential household water bills for residential household consumption of 15.1 m³ per month, the average residential customer consumption per month in Edmonton in 2021. Comparison of residential water bills shows that Edmonton's water bills are competitive with all of the cities and local communities surveyed. Vancouver continues to have the lowest rates due to its excellent raw water source and, therefore, lower needs for water treatment than Edmonton which has a naturally highly variable water source in the North Saskatchewan River.

Figure 2.5.1
2021 Monthly Residential Water Bill Comparison
(15.1 m³/month)



2.5.2 Commercial Water Bills

Table 2.5.2 provides a comparison of the water bills for commercial customer of various sizes. This table shows that water bills for EWSI's commercial customers are competitive with all of the other surrounding communities and other major cities in western Canada, except for Vancouver.

Table 2.5.2
Commercial Monthly Water Bill Comparison
(\$ per month)

		Α	В	С	D
	Average Monthly Bill	Small	Medium	Large	Extra Large
1	Monthly Consumption - m3 per month	10	250	1,000	5,000
2	Vancouver	22.52	353.11	1,435	7,029
3	Calgary	28.76	378.78	1,558	7,647
4	Regina	47.40	561.90	2,390	11,266
5	Winnipeg	38.80	498.10	2,006	9,761
6	Edmonton	24.97	428.33	1,711	7,223
7	St. Albert	28.41	465.21	1,830	9,110
8	Sherwood Park	32.96	695.36	2,765	13,805
9	Stony Plain	37.12	928.03	3,712	18,561
10	Leduc	36.60	680.95	2,822	13,462

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3 Wastewater Treatment Services

3.1 Customers and Consumption

Wastewater's customer counts, consumption and consumption per customer are similar to those of In-City Water. Differences in customer counts, almost entirely within the commercial customer class, are attributable to "water-only" customers who are not tied into the City's drainage system. Water-only customers include businesses in industrial parks that are served by septic systems, as well as seasonal water customers, such as commercial lawn watering services and golf courses. Table 3.1 below provides a comparison of 2021 and 2017-2021 forecast to actual customer counts and consumption per customer.

Table 3.1
Wastewater Treatment Customers, Consumption and Consumption per Customer

· · ·						
		Α	В	С	D	
		20	21	2017-2021		
	Customers and Consumption	PBR		PBR		
		Forecast	Actual	Forecast	Actual	
1	Customers					
2	Residential	276,223	277,598	266,113	268,676	
3	Multi-Residential	3,929	3,801	3,837	3,775	
4	Commercial	17,414	17,167	16,972	16,952	
5	Total	297,566	298,566	286,922	289,403	
6	Monthly Consumption per Customer					
7	Residential	13.7	15.0	14.2	14.5	
8	Multi-Residential	408.8	417.3	408.8	400.6	
9	Commercial	117.0	96.1	120.9	107.4	
10	Annual Consumption - ML					
11	Residential	45,438	49,973	226,109	234,025	
12	Multi-Residential	19,276	19,035	94,122	90,739	
13	Commercial	24,459	19,798	123,083	109,203	
14	Total	89,173	88,806	443,314	433,967	

Actual to forecast differences in Wastewater's customer counts and consumption are attributable to the same factors discussed in Section 2.2.

3.2 Financial Performance

Wastewater's revenue requirements are summarized on Table 3.2 below.

Table 3.2
Wastewater Treatment Revenue Requirements
(\$ millions)

	·	A	В	С	D
		202	21	2017-	2021
	Summary of Revenue Requirements	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Wastewater Rate Revenue*	112.8	107.3	496.3	473.0
2	Wastewater Revenue Requirement				
3	Operating expenses	60.4	56.6	286.8	257.1
4	Other revenue	(7.4)	(9.8)	(33.9)	(35.4)
5	Depreciation and amortization	20.0	20.6	86.1	88.7
6	Return on rate base financed by debt	14.5	11.6	62.0	56.1
7	Return on rate base financed by equity	21.7	28.0	95.4	106.6
8	Wastewater Revenue Requirement*	109.4	107.3	496.3	473.0
9	Return on Rate Base Financed by Equity	10.18%	14.25%	10.18%	12.13%

^{*} In the PBR forecast, rebasing and other special rate adjustments have been smoothed over the PBR term. Therefore, although forecast revenue is equal to the revenue requirement over the 2017-2021 PBR term, in any year within the PBR term, forecast revenue may be greater or less than the revenue requirement

Detailed explanations for forecast to actual variances for each of the elements of the revenue requirement are provided in sections 3.2.1 to 3.2.6.

3.2.1 Revenue

Wastewater's rate revenues include fixed monthly services charges applied on a per connection basis, and consumption charges applied to each cubic metre of consumption. Besides rate revenues, Wastewater's other revenue consists primarily of over-strength surcharges that are subject to the same rate adjustment mechanism as Wastewater's rate revenue. The remaining other revenue is derived from a variety of sources, including provision of services to the Alberta Capital Region Wastewater Commission and other suburban customers, sale of nutrients derived from Ostara, late payment charges, and various other services. Table 3.2.1 below provides a comparison of Wastewater's 2021 actual and forecast revenue.

Wastewater's rate revenues were \$5.5 million less than forecast in 2021, and \$23.3 million less than forecast over the 2017-2021 PBR period. This difference is primarily attributable to four factors:

- Lower than forecast inflation resulted in \$4.0 million less revenue in 2021 than forecast (\$11.1 million lower than forecast for 2017-2021);
- Lower than forecast consumption resulted in a \$3.7 million decrease in 2021 (\$17.5 million lower than forecast for 2017-2021); and
- A Non-Routine Adjustment related to the transfer of Drainage Services to EPCOR (see Section 1.5) which reduced revenues by \$1.2 million in 2021 relative to the forecast (\$4.3 million lower than forecast for 2017-2021); partially offset by

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 Higher than forecast over-strength surcharges increased other revenue by \$1.4 million in 2021 (\$1.6 million higher than forecast for 2017-2021). The remainder of the higher than forecast other revenue related to numerous items, none of which are individually significant.

Table 3.2.1
Wastewater Treatment Revenue
(\$ millions)

		Α	В	С	D
		20	21	2017-	-2021
	Wastewater Treatment Revenue	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Fixed Monthly Service Charges				
2	Residential	18.3	16.7	78.7	73.4
3	Multi-Residential	0.3	0.2	1.1	1.0
4	Commercial	1.2	1.0	5.0	4.6
5	Fixed Monthly Service Charges	19.7	18.0	84.9	79.0
6	Consumption Charges				
7	Residential	48.1	51.2	213.0	216.2
8	Multi-Residential	20.4	19.5	88.8	83.7
9	Commercial	24.5	18.5	109.7	94.0
10	Consumption Charges	93.0	89.3	411.4	393.9
11	Wastewater Rate Revenue	112.8	107.3	496.3	473.0
12	Other Revenue	7.4	9.8	33.9	35.4
13	Total Wastewater Treatment Revenue	120.1	117.0	530.2	508.4

3.2.2 Operating Expenses by Function

Wastewater's operating expenses are presented and analyzed on both functional and cost category bases. Actual and forecast operating expenses by function are shown in Table 3.2.2 below:

Table 3.2.2
Wastewater Treatment Operating Expenses by Function
(\$ millions)

		Α	В	С	D
			2021		2021
	Function and Sub-function	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Power, Other Utilities and Chemicals				
2	Power and Other Utilities	5.7	5.2	27.2	25.1
3	Chemicals	1.7	1.1	8.2	5.8
4	Power, Other Utilities and Chemicals	7.4	6.2	35.4	30.9
5	Wastewater Treatment				
6	Wastewater Treatment Plant	19.9	19.3	96.6	89.6
7	Operations Support Services	8.6	6.1	41.5	31.8
8	Capitalized Overhead	(2.5)	(2.8)	(12.2)	(14.4)
9	Wastewater Treatment	26.0	22.7	125.9	107.0
10	Billing, Meters and Customer Service				
11	Billing and collections	3.7	3.5	17.2	17.1
12	Meter reading	2.5	2.2	12.2	11.6
13	Regulatory Services	1.1	2.0	5.1	7.3
14	Billing, Meters and Customer Service	7.3	7.7	34.5	36.0
15	EWSI Shared Services				

		Α	В	С	D
		202	1	2017-	2021
	Function and Sub-function	PBR		PBR	
		Forecast	Actual	Forecast	Actual
16	EWSI Shared Services	3.6	4.0	17.3	17.4
17	Incentive and Other Compensation	1.2	1.8	5.8	5.0
18	EWSI Shared Services	4.8	5.8	23.1	22.4
19	Corporate Shared Services	5.2	4.8	25.1	20.7
20	Franchise Fees and Property Taxes				
21	Franchise Fees	8.5	8.6	37.9	37.1
22	Property Taxes	1.3	0.6	4.9	3.0
23	Franchise Fees and Property Taxes	9.8	9.3	42.8	40.1
24	Total Operating Expenses by Function	60.4	56.6	286.8	257.1

Overall, Wastewater's operating expenses for 2021 were \$3.8 million lower than forecast (\$29.6 million lower for 2017-2021). Key factors contributing to this difference include:

- **Power and Other Utilities** \$0.5 million lower than forecast in 2021 (\$2.1 million lower than forecast for 2017-2021) due to lower than forecast power prices related to new power agreements.
- Chemicals \$0.6 million lower than forecast in 2021 (\$2.4 million lower than forecast for 2017-2021), due to two factors. First, the Ostara nutrient removal facility was offline more than expected, resulting in lower chemical usage over the 2017 to 2021 period. Second, process and dosing optimization enabled Wastewater to achieve significant reductions in alum usage over the 2017 to 2021 period.
- Wastewater Treatment \$3.3 million lower than forecast in 2021 (\$18.9 million lower than forecast for 2017-2021). The variance is primarily attributable to adjustments to the capital program, where projects with a high component of contractor costs have been replaced by capital maintenance and repair projects completed by Wastewater personnel. These changes have led to capitalization of an additional \$2.3 million of internal labour costs that would otherwise have been expensed (\$8.1 million for 2017-2021) and additional capitalized overheads of \$0.3 million in 2021 (\$2.2 million for 2017-2021). Besides these changes, the variance also reflects lower than forecast fringe benefits costs of \$0.4 million in 2021 (\$2.8 million lower than forecast for 2017-2021) related to lower pension contributions, and \$1.1 million in savings in contractor costs (\$5.0 million lower than forecast for 2017-2021) resulting from dissolution of the Centre for Excellence, lower maintenance costs, and the completion of fewer engineering studies in 2021. The remainder of the variance results from numerous small items, none of which are individually significant.
- Billing, Meters and Customer Service \$0.4 million higher than forecast in 2021 (\$1.5 million greater for 2017-2021) primarily due to higher than forecasted drainage compliance costs related to measurement of wastewater overstrength constituents. These increases, which amounted to \$0.9 million in 2021 (\$2.2 million for 2017-2021) were partially offset by lower than forecast billing and collections and meter reading costs.
- EWSI Shared Services \$1.0 million higher than forecast in 2021 (\$0.7 million lower than forecast for 2017-2021). Higher than forecast costs in this category in 2021 reflect a \$0.4 million increase in business unit allocations (\$0.1 million higher than forecast for 2017-2021) and higher than forecast incentive compensation of \$0.6 million (no variance from forecast for 2017-2021). The 2017-2021 variance also includes \$0.8 million of savings in long term disability premiums.

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Corporate Shared Services – \$0.4 million less than forecast in 2021 (\$4.4 million less for 2017-2021). These differences reflect both the reduction in corporate cost allocations resulting from the transfer of Drainage from the City of Edmonton to EUI, as well as cost savings in corporate functions. As with In-City Water, the cost reductions arising from the transfer of Drainage Services have been returned to Wastewater customers through a Non-Routine Adjustment to 2018 to 2021 wastewater rates.

• Franchise Fees and Property Taxes – \$0.5 million less than forecast in 2021 (\$2.7 million less for 2017-2021). Franchise fees are calculated as 8% of eligible revenue less the municipal portion of property taxes. Although 2021 revenues were less than forecast, lower than forecast property taxes resulted in a lower than forecast reduction to 2021 and 2017-2021 franchise fees. Lower than forecast property taxes of \$0.7 million in 2021 (\$1.9 million less than forecast for 2017-2021) relate to the deferral of capital projects, including the Operations Center at Mid-point Entrance project, which had been forecast to increase property taxes starting in 2018.

3.2.3 Operating Expenses by Cost Category

Table 3.2.3 shows operating expenses by cost category for Wastewater Treatment Plant Operations, Billing Meters and Customer Service, and EWSI Shared Services, where cost categories differ from the sub-functions in Section 3.2.2.

Table 3.2.3
Wastewater Treatment Operating Costs by Cost Category
(\$ millions)

		Α	В	С	D
		20	21	2017-2021	
	Cost Category	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Wastewater Treatment Plant Operations				
2	Staff Costs and Employee Benefits	18.5	15.8	89.2	75.9
3	Contractors and Consultants	4.3	2.7	21.4	15.3
4	Materials and Supplies	2.1	2.1	10.3	10.7
5	Other	1.1	2.1	5.0	5.1
6	Wastewater Treatment Plant Operations Expenses	26.0	22.7	125.9	107.0
7	Billing, Meters and Customer Service				
8	CUS Charges	3.7	3.5	17.2	17.1
9	Contractors and Consultants	3.6	4.2	17.3	18.9
10	Billings, Meters and Customer Services Expenses	7.3	7.7	34.5	36.0
11	EWSI Shared Services				
12	EWSI Shared Services Allocation	3.3	3.4	16.0	15.0
13	Staff Costs and Employee Benefits	1.3	2.1	6.5	6.7
14	Other	0.1	0.2	0.6	0.7
15	EWSI Shared Services Expenses	4.8	5.8	23.1	22.4

The information presented in this table supports the explanations of differences between 2021 actual and forecast expenses provided in Section 3.2.2. Accordingly, no additional explanations are considered necessary.

3.2.4 Depreciation and Amortization

Wastewater's depreciation expense and amortization of contributed assets for 2021 are shown in Tables 3.2.4 below:

Table 3.2.4
Wastewater Treatment Depreciation and Amortization (\$ millions)

		Α	В	С	D
Depreciation and Amortization		20	21	2017-2021	
		PBR		PBR	
			Actual	Forecast	Actual
1	Gross depreciation expense	21.0	21.6	90.7	93.3
2	Amortization of contributions	(0.9)	(0.9)	(4.7)	(4.6)
3	Depreciation, net	20.0	20.6	86.1	88.7

Wastewater's 2021 depreciation expense was \$0.6 million greater than forecast (\$2.6 million greater for 2017-2021), even though plant in service was \$77.4 million (10%) less than forecast at December 31, 2021 (Table 3.2.5, line 5). This difference results from adjustments to Wastewater's capital program where asset replacement projects were replaced with capital maintenance and repair projects with shorter expected useful lives and, therefore, higher effective depreciation.

3.2.5 Rate Base

Wastewater's 2021 mid-year rate base, shown in Table 3.2.5 below, was \$43.7 million less than forecast, reflecting lower than forecast capital additions over the 2017 to 2021 period resulting from project deferrals and other adjustments to the capital program described in Section 3.3.1.

Table 3.2.5
Wastewater Treatment Mid-Year Rate Base (\$ millions)

		Α	В
			21
		PBR	
	Components of Mid-Year Rate Base, net of Contributions	Forecast	Actual
1	Plant in Service		
2	Balance, beginning of year	745.8	681.9
3	Capital additions	34.9	24.7
4	Retirements and adjustments	-	(3.3)
5	Balance, end of year	780.7	703.3
6	Mid-Year Plant in service	763.3	692.6
7	Accumulated Depreciation		
8	Balance, beginning of year	206.0	181.4
9	Depreciation expense	21.0	21.5
10	Retirements and adjustments	-	(3.3)
11	Balance, end of year	227.0	199.6
12	Mid-Year Accumulated Depreciation	216.5	190.5
13	Other Rate Base Items		
14	Working Capital	7.0	7.5
15	Materials and Supplies	1.6	2.1
16	Gross Mid-Year Rate Base	555.3	511.6

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		Α	В
		202	21
		PBR	
	Components of Mid-Year Rate Base, net of Contributions	Forecast	Actual
17	Contributions		
18	Balance, beginning of year	41.0	41.0
19	Contributions in aid of construction		-
20	Balance, end of year	41.0	41.0
21	Mid-Year Contributions	41.0	41.0
22	Accumulated Amortization		
23	Balance, beginning of year	19.3	19.3
24	Amortization of contributions	0.9	0.9
25	Balance, end of year	20.3	20.2
26	Mid-Year Accumulated Amortization	19.8	19.8
27	Mid-Year Contributions	21.2	21.2
28	Mid-Year Rate Base	534.1	490.5

Unlike In-City Water, where contributions relate primarily to developer-funded assets, contributions included in Wastewater's rate base offset the cost of non-utility assets included in Wastewater's plant in service. This treatment ensures that the capital costs associated with these assets are not borne by utility rate payers. The cost of operating these assets, as well as any related revenues are also excluded from Wastewater's financial results.

3.2.6 Return on Rate Base

In 2021, Wastewater's return on equity was \$6.3 million greater than forecast (\$11.2 million greater for 2017-2021) enabling Wastewater to achieve a return on equity of 14.25% in 2021 (12.13% for 2017-2021). Approximately \$3.4 million of the 2021 difference results from revenue smoothing, where rate increases related to the Special Rate Adjustments for Rebasing are smoothed over the PBR term. The remainder of the difference results from cost savings (see section 3.2.2) and interest expense savings (see below) that exceeded lower than forecast revenues (see section 3.2.1). The lower than forecast rate base also contributed to the higher than forecast rate of return on equity; if the 2021 rate base had been at forecast levels, EWSI's 2021 return would have been 13.2%, rather than 14.25%.

Table 3.2.6-1
Wastewater Treatment Return on Rate Base (\$ millions)

		202	21	2017-2	2021
	Return on Rate Base	PBR Forecast	Actual	PBR Forecast	Actual
1	Mid-year Rate Base	534.1	476.8		
2 3 4	Deemed Capital Structure Debt (%) Equity (%)	60.00% 40.00%	60.00% 40.00%		
5 6 7	Cost of Capital Cost of Debt Cost of Equity	4.53% 10.18%	4.04% 14.25%	4.41% 10.18%	4.25% 12.13%
8	Weighted Average Cost of Capital (WACC) Return on Mid-Year Rate Base	6.79%	8.12%	6.72%	7.40%
10	Return on Rate Base Financed by Debt	14.5	11.9	62.0	56.1

11	Return on Rate Base Financed by Equity	21.7	28.0	95.4	106.6
12	Return on Mid-year Rate Base	36.3	39.8	157.4	162.6

Wastewater's weighted average cost of debt calculation are shown in Table 3.2.6-2 below. Lower than forecast cost of debt reflects lower than forecast interest rates on new debt issuances, attributable to the Bank of Canada's efforts to maintain low interest rates in response to COVID-19-related declines in economic activity in 2020 and 2021.

Table 3.2.6-2
Wastewater Treatment Interest Expense and Cost of Debt
(\$ millions)

	(†one	Α	В	С	D
		20	21	2017-	-2021
	Interest Expense and Cost of Debt	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Interest Expense				
2	Interest on short-term debt	1.0	0.2	4.6	3.8
3	Interest on City of Edmonton debentures	2.3	-	14.0	6.2
4	Interest on intercompany debentures	11.3	11.6	44.6	46.9
5	Total Interest expense	14.5	11.9	63.3	56.9
6	Mid-year debt and other long-term liabilities				
7	Mid-Year Short-term debt	35.1	14.1		
8	Mid-Year Long-term debt	284.0	279.0		
9	Mid-Year Other Long-term liabilities	0.5	0.4		
10	Total Mid-year debt and other long-term liabilities	319.6	293.5		
11	Embedded cost of Debt	4.53%	4.04%	4.41%	4.25%

3.2.7 Transactions with Affiliates

Wastewater derives a significant proportion of its revenue and expenses from transactions with affiliates, including the City of Edmonton, EUI, and its subsidiaries, and other EPCOR Water Services Inc. business units. Table 3.2.7 summarizes Wastewater's transactions with affiliates.

Table 3.2.7
Wastewater Treatment Transactions with Affiliates (\$ millions)

		Α	В	С	D
			21	2017-2021	
	Affiliate and Service	PBR		PBR	
		Forecast	Actual	Forecast	Actual
1	Revenues from the provision of services to the City of				
	Edmonton				
2	Wastewater Treatment Services	1.1	8.0	5.2	5.3
3	Other Services	0.2	-	1.2	0.3
4	Total	1.3	0.8	6.4	5.6
5	Services provided by (recovered from):				
6	City of Edmonton				
7	Franchise Fees	8.5	8.6	37.9	37.1
8	Property Taxes	1.3	0.6	4.9	3.0
9	Interest on Long Term Debt	2.3	-	14.0	6.2
10	Regulatory Services	1.1	-	5.1	0.7

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11	Biosolids Contractor Service		0.4	-	-
12	Other Services	0.2	0.1	0.9	0.9
13	Total	13.3	9.8	62.9	47.9
14	EPCOR Utilities Inc.				
15	Corporate Shared Service Costs	5.2	4.8	25.1	20.7
16	Interest on Intercompany Loans	11.3	11.6	44.6	46.9
17	Interest on Short-term debt	1.0	0.2	4.6	3.8
18	Other Services	-	0.1	-	-
19	Total	17.4	17.0	74.3	71.4
20	EPCOR Distribution and Transmission Inc.				
21	Maintenance and other services	0.1	(0.0)	0.1	0.1
22	EPCOR Technologies Inc.				
23	Hydrovac Charges	-	0.0	-	0.3
24	EPCOR Energy Alberta LP				
25	Billing and Collection Services	3.4	3.1	15.5	14.8
26	Other EWSI Business Units				
27	EWSI Shared Services Allocation	3.3	3.3	16.0	14.9
28	Meter reading services from In-City Water	2.5	2.2	12.2	11.6
29	Water purchases from In-City Water	0.4	0.4	1.9	2.1
30	Regulatory services from Drainage Services	3.4	2.0	15.5	6.7
31	Project engineering recoveries from Drainage	-		-	(1.2)
32	Laboratory services recoveries from Drainage	-	(0.3)	-	(1.3)
		-	(0.0)	-	-
33	Total	9.6	7.7	45.6	32.7
34	Expenditures on capital projects arising from				
	services provided by:				
35	City of Edmonton	-	0.0	-	0.1
36	EPCOR Technologies Inc.	-	0.0	-	0.3
37	EPCOR Utilities Inc.	-	0.1	-	0.4
38	Total	-	0.1	-	8.0

3.3 Capital Programs

3.3.1 Capital Expenditures

Table 3.3.1 compares approved capital expenditures from the PBR forecast to actual capital expenditures for 2021 for each project with approved capital expenditures in excess of \$5.0 million over the 2017-2021 PBR term, as well as for each project category. Table 3.3.1 also provides a comparison of total 2017-2021 approved capital expenditures to EWSI's current capital forecast.

Water and Wastewater Treatment PBR 2017-2021

EPCOR Water Services Inc.

Table 3.3.1
Wastewater Treatment Capital Expenditures
(\$ millions)

		A	В	С	D	Е	F	1
			2021			2017 to 202	21	
		PBR			PBR			Ī
		Forecast	Actual	Difference	Forecast	Actual	Difference	
	Reliability and Life Cycle Improvements							
1	Build Pipe Racks	-	1.0	1.0	-	10.3	10.3	1
2	Sludge Line Upgrades	-	0.0	0.0	3.4	8.1	4.7	2
3		-	0.0	0.0	-	7.8	7.8	2
4	Clarifier Chain Replacement	0.7	1.4	0.7	4.1	9.4	5.3	3
5	Mechanical Rehab Program	1.6	2.4	0.7	15.6	20.5	5.0	4
6	Structural Rehab Secondaries 1-8	3.6	3.3	(0.3)	17.6	21.1	3.5	5
7	Structural Rehab Pgm	1.6	3.9	2.3	7.7	10.9	3.3	6
8	Digester 3 Upgrades	-	0.3	0.3	11.3	14.4	3.1	7
9	Distribution Chamber Reconstruction	-	0.0	0.0	3.8	6.8	3.0	8
10	Operations Centre at Mid-Point Entrance	-	2.3	2.3	19.4	3.8	(15.6)	9
11	Digester 4 Upgrades	-	0.0	0.0	12.0	1.4	(10.6)	10
12	Square 1 Gas Room Replacement	3.6	4.5	1.0	15.6	5.8	(9.7)	11
13	Site HVAC Rehabilitation	1.8	6.6	4.9	31.5	25.0	(6.5)	12
14	Headworks & Primary Aeration Upgrades	-	0.0	0.0	6.7	1.4	(5.3)	13
15	Utility Hot Water System Rehabilitation	1.0	0.2	(8.0)	13.9	9.0	(4.8)	14
16	Buildings and Site Rehab	1.2	2.5	1.3	12.8	8.2	(4.6)	15
17	Electrical Rehab Program	1.8	1.3	(0.5)	7.2	8.1	0.9	16
18	Projects < \$5 million	1.8	7.9	6.1	21.2	27.2	6.1	16
19	Subtotal	18.7	37.6	18.9	203.4	199.3	(4.1)	
	Performance Efficiency and Improvement							
20	Plant Improvements	0.6	2.8	2.2	2.9	8.5	5.6	17
21	Projects < \$5 million	2.3	0.8	(1.5)	14.7	8.4	(6.3)	18
23	Subtotal	2.9	3.5	0.7	17.6	16.8	(8.0)	Ī
	Growth/Customer Requirements							
24	Hydrovac Sanitary Grit Treatment Facility	-	0.3	0.3	8.4	7.7	(0.7)	
25	Projects < \$5 million	-	0.1	0.1	1.5	2.1	0.5	
26	Subtotal	-	0.4	0.4	9.9	9.7	(0.2)	
	Health, Safety and Environment							
27	Projects < \$5 million	0.6	2.1	1.5	4.5	4.2	(0.3)	
	Regulatory						,	
28	Projects < \$5 million	-	1.5	1.5	-	2.8	2.8	19
29	Capital Expenditures, net of Contributions	22.1	45.1	23.0	235.4	232.9	(2.6)	

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Explanations for differences between PBR forecast capital expenditures for 2017 to 2021 and EWSI's current projection in excess of \$2.0 million include:

- 1. Build Pipe Racks \$10.3 million (new project) greater than the 2017-2021 PBR forecast. This project is required to construct the first portion of an above-ground pipe rack network at the Gold Bar WWTP needed to improve site safety by relocating natural gas and other utilities from the underground tunnels. This project is currently on hold until 2024-2025 and is forecasted to incur \$9.1 million in capex during the 2022-2024 PBR term.
- 2. Sludge Line Upgrades and Replace 2.5 km of Sludge lines \$12.5 million (372%) greater than the 2017-2021 PBR forecast. EWSI needed to replace 2.5 km of sludge lines which were found to be in such poor condition that repairs and/or rehabilitation was not technically feasible at a total cost of \$7.8 million. The remaining \$4.7 million increase relates to the completion of other sludge line rehabilitation work following inspections that showed that these sludge lines required significant rehabilitation to minimize risk of leakage.
- 3. Clarifier Chain Replacement \$5.3 million (132%) greater than the 2017-2021 PBR forecast following identification of severe corrosion of the stainless steel chain within several primary and secondary clarifiers at the Gold Bar WWTP in 2017 and premature chain failures in late 2017 and early 2018.
- 4. **Mechanical Rehabilitation Program** \$5.0 million (32%) greater than the 2017-2021 PBR forecast, primarily due to advancing mechanical rehabilitation of the secondaries into the 2017-2021 PBR term. This work was completed in conjunction with the structural rehabilitation projects, allowing for additional efficiencies in delivery of the work.
- 5. **Structural Rehabilitation Secondaries 1-8** \$3.5 million (20%) greater than the 2017-2021 PBR forecast, primarily due to additional rehabilitation work on Secondaries 1 and 4, which could not be identified until the clarifiers could be shut down, cleaned and inspected.
- 6. **Structural Rehabilitation Program** \$3.3 million (43%) greater than the 2017-2021 PBR forecast due to the need to address severe concrete deterioration at the diversion structure caused by long-term H2S gas exposure. This increase has been partially offset by deferral of lower priority structural rehabilitation sub-projects to future PBR periods.
- 7. **Digester 3 Upgrades** \$3.1 million (27%) greater than the 2017-2021 PBR forecast, primarily due to the costs associated with addressing unanticipated structural integrity issues identified during construction.
- 8. **Distribution Chamber Reconstruction** \$3.0 million (79%) greater than the 2017-2021 PBR forecast, resulting in higher than expected competitive bids from contractors, as well as higher than expected costs to demolish the existing distribution chamber and to construct the lift station tie-ins.
- 9. Operations Centre at Mid-Point Entrance \$15.6 million (81%) less than the 2017-2021 PBR forecast, due to design and scope adjustments incorporating the results of public consultation and Gold Bar's commitment to complete all future construction within the existing footprint of the Gold Bar WWTP. The project is now expected to be completed in 2022 with a much reduced scope of renovations to the existing Centre of Excellence building, and is forecasted to incur \$3.8 million in capex during the 2022-2024 PBR term.

10. Digester 4 Upgrades – \$10.6 million (88%) less than the 2017-2021 PBR forecast. When structural issues were identified with Digester 3 in 2019, requiring Digester 3 to remain out of service, EWSI completed an overall assessment of the solids loading to the Gold Bar WWTP. This assessment determined that Digester 4 was not required in the short term to meet treatment requirements, allowing EWSI to defer this project to the 2022-2024 PBR term and focus on other higher priority wastewater plant projects. The \$1.4 million in capex during the 2017-2021 PBR term reflects the cost associated with shutting down the digester, removal of sludge and cleaning of the digester interior, and a visual condition assessment.

- 11. **Square 1 Gas Room Replacement** \$9.7 million (63%) less than the 2017-2021 PBR forecast. This project was initially expected to include the construction of a new gas room as part of the overall upgrades to Digester Square 1. Instead of building a single larger new gas room, EWSI's revised engineering solution will relocate new gas mixing compressors to a separate enclosure. EWSI determined the revised solution would better minimize explosion risks by installing the new equipment within a single skid unit located outside the existing Square 1 Gas Room. The project is on-going and is forecasted to incur \$7.3 million in capex during the 2022-2024 PBR term.
- 12. **Site HVAC Rehabilitation** \$6.5 million (21%) less than the 2017-2021 PBR forecast. This program includes various sub-projects that will address Gold Bar WWTP spaces that have insufficient ventilation, improve or replace deficient ventilation equipment, and/or upgrade existing ventilation systems. Included in this sub-project is the EPT Scrubber Upgrade intended to upgrade the current EPT Scrubber system at Gold Bar WWTP (\$4.3 million). The EPT Scrubber project is on-going and is forecasted to incur \$15.3 million in capex during the 2022-2024 PBR term.
- 13. **Headworks and Primary Aeration System Upgrades** \$5.3 million (79%) less than the 2017-2021 PBR forecast. This project was intended to resolve air supply capacity constraints associated with the blowers that supply air to the grit tanks, pre-treatment channel aeration systems and aeration equipment. Increased aeration to the channels is intended to reduce deposition of solids in these channels. As the project progressed through detailed design, it was determined that some elements of the original scope were not necessary to achieve the desired system performance. As a result, total project scope and costs were able to be reduced.
- 14. **Utility Hot Water System Rehabilitation** \$4.8 million (35%) less than the 2017-2021 PBR forecast. The decrease in project spending is primarily due to the deferral of certain non-critical upgrades to a future PBR period, allowing these upgrades to be better coordinated with upgrades to other key components within the heating system.
- 15. **Buildings and Site Rehabilitation Program** \$4.6 million (36%) less than the 2017-2021 PBR forecast. EWSI reduced the scope of this program following an internal review of the program in 2020, which concluded that certain non-critical sub-projects could be safely deferred to future PBR periods, allowing resources to be re-allocated to unanticipated, higher-priority projects.
- 16. **Reliability & Life Cycle Improvement Projects < \$5 million** \$7.0 million greater than the 2017-2021 PBR forecast, due to:
 - a. \$2.0 million to purchase and install new on-site emergency back-up power generation;
 - \$3.1 million in unanticipated preliminary scope and design costs associated with a new Clover Bar Dewatering Facility, which were triggered by the shutdown of the City of Edmonton's composting facility;

- c. \$1.8 million in unanticipated capex for Digester 5 Structural Assessment and Rehabilitation project to complete cleaning, structural assessments and brick shoring;
- d. \$1.5 million in unanticipated capex for Digester Square 1 to complete the rehabilitation of various structural components;
- e. \$3.2 million reduction in capex due to the deferral of the Gas Compressor Replacement, Fermenter TPS Pumps and Blower 6 overhaul projects.
- f. \$1.7 million in capital expenditures on minor projects, none of which are individually significant.
- 17. **Plant Improvements** Program \$5.6 million (193%) greater than the 2017-2021 PBR forecast. Over the past several years, improvement projects have been delivered in several different programs including Plant Improvements, Instrumentation Upgrades, and Control System Upgrades. Significant portions of these three programs have been combined into the Plant Improvements program (\$5.4 million).
- 18. **Performance Projects < \$5.0 million** \$6.3 million less than forecast for 2017-2021. The decreased capital expenditures result primarily from the cancellation of the Channel Access Improvement project (\$2.1 million) and a number of small variances on individual programs and projects (each less than \$1.0 million).
- 19. **Regulatory Capital Projects < \$5.0 million -** \$2.8 million (100%) greater than forecast for 2017-2021 primarily due to the unbudgeted installation secure pedestrian access pathways and gates (\$1.1 million) and the unbudgeted construction of an air quality monitoring station between the Gold Bar WWTP and communities to the south of the plant (\$1.3 million) as required by EWSI's Alberta Environmental Protection and Enhancement Act approval to operate and reduce air quality impacts from the wastewater treatment process.

3.3.2 Construction Work in Progress

Wastewater's rate base consists of plant in service. If a capital project has not been completed (i.e. not placed into service) during the year, the capital expenditures on that project remain in Construction Work in Progress and are excluded from the rate base. The 2021 year-end balance of Wastewater's Construction Work in Progress was \$41.1 million greater than forecast, almost entirely due to changes in the timing of project completion.

Table 3.3.2
Wastewater Treatment Construction Work in Progress
(\$ millions)

		Α	В	С	D
		2021		2017-2021	
	Construction Work in Progress	PBR		PBR	
			Actual	Forecast	Actual
1	Balance, beginning of period	12.8	20.7	19.2	22.6
2	Capital Expenditures	22.1	45.1	235.4	232.9
3	Capital Additions	(34.9)	(24.7)	(254.7)	(214.4)
4	Balance, end of period	0.0	41.1	0.0	41.1

The PBR plan allows EWSI to capitalize the costs of financing certain projects remaining in Construction Work in Progress, using AFUDC. In 2021, because of the higher average balance of Construction Work

in Progress, AFUDC included in capital expenditures on eligible projects amounted to \$1.7 million, compared to the PBR forecast amount of \$0.4 million.

3.4 Operational Performance

3.4.1 Water Quality and Environmental Index

The Water Quality and Environmental index is a composite measure intended to assess EWSI's impact on the environment through the quality of the wastewater effluent returned back to the North Saskatchewan River and the effectiveness of environmental management programs.

Table 3.4.1 Water Quality and Environmental Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index	
Water Quality Factor	The value of the Wastewater Effluent Limit Performance, which aggregates measures of the percentage of the discharge limit for five parameters in the Gold Bar wastewater treatment plant's final effluent.	≤ 28.0	18.2	1.535	
Environmental Incident Factor	The actual number of environmental incidents that are both reportable and preventable	≤ 10	1	10.000	
		A	verage Index	5.768	
Index Standard Points					
Total Actual Points					
Maximum Available Points Including Bonus Points					
		Total Po	oints Earned	60.5	

2021 Highlights

- Wastewater Effluent Limit Performance Index: The use of "winter mode" for the secondary
 treatment process by increasing aeration in the bioreactors also proved to be effective in controlling
 ammonia in winter. Lower than average wet weather flows in 2021 resulted in more consistent
 secondary treatment throughout the summer months. As a result, 2021 had the lowest WELPI in the
 past five years.
- Environment Incident Management: For 2021, there were three reportable environmental incidents pertaining to Gold Bar operations. Root cause investigations were carried out on three reportable events (water main break, missed fence line H₂S sample and unplanned power outage). One of these events were determined to be preventable after review (i.e., missed fence line H₂S sample). These investigations provided information that resulted in improvements to operating, maintenance and asset management practices.

2022 Areas for Improvement

 Wastewater Effluent Limit Performance Index: There will be a continued focus on limiting unplanned process downtime to maximize treatment levels. Installation of a full-scale inDENSE™

secondary system will start in 2022 to further improve the overall performance of the biological nutrient removal (BNR) process.

Environment Incident Management: Efforts to manage odour-related incidents will be continued
with planned commissioning of an air quality monitoring station south of the Gold Bar plant in 2022
as required by the approval to operate. EPCOR will also complete additional daily H2S fence line
sampling refresher training for field staff.

3.4.2 Customer Service Index

Wastewater's customer service index for the 2017-2021 PBR term includes three equally weighted odour metrics. These metrics recognize that Wastewater's customer interactions typically relate to odour concerns from customers located close to the Gold Bar Wastewater Treatment Plant.

Table 3.4.2
Customer Service Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index	
H ₂ S – 1 Hour Exceedance Factor	The number of hourly exceedances of the 1 hour limit averaged between Gold Bar and Beverly air quality monitoring stations.	≤ 6	1	6.000	
H ₂ S – 24 Hour Exceedance Factor	The number of hourly exceedances of the 24 hour limit averaged between Gold Bar and Beverly air quality monitoring stations.	≤2	0	2.000	
Scrubber Uptime Factor	The percentage of time that the scrubbers are on line.	≥ 90.0	99.2	1.102	
	/	Α	verage Index	3.034	
Index Standard Points					
Total Actual Points					
Maximum Available Points Including Bonus Points					
		Total Po	oints Earned	16.5	

2021 Highlights

- H₂S 1 and 24 Hour Exceedance Factor: There was one 1-hour H2S exceedance and no 24-hour exceedances in 2021. Continued routine fence line H2S monitoring and ad hoc H2S monitoring when scrubbers were offline for maintenance enabled Gold Bar operations to intervene prior to elevated levels of H2S and avoid additional potential exceedances.
- **Scrubber Uptime Factor:** Additional focus was placed on planning preventative and corrective maintenance activities to limit scrubber downtime. Chemical feed pumps and instrumentation were continuously monitored to ensure scrubber reliability and operations.

2022 Areas for Improvement

 H₂S – 1 and 24 Hour Exceedance Factor: Construction of a new air quality monitoring station south of the Gold Bar WWTP will be completed and operational by Q3 2022. Routine fence line H2S monitoring will continue as a supplement to the Gold Bar odour monitoring strategies. Design

activities will also begin on projects to capture and treat odour from the diversion structure and primary clarifier areas of the plant.

 Scrubber Uptime Factor: The current preventative maintenance program will be continued to limit scrubber downtime. A program to increase scrubber performance and reliability by rehabilitation or scrubber media replacement will occur in 2022. Construction of an additional new EPT scrubber with increased redundancy is currently underway.

3.4.3 System Reliability and Optimization Index

The system reliability and optimization index is a measure of the performance of the Gold Bar Wastewater Treatment Plant and the degree to which the wastewater treatment system is optimized to minimize its impact on the environment.

Table 3.4.3
System Reliability and Optimization Index

			Actual	
Index Component	PBR Performance Measure	Standard	Score	Index
Enhanced Primary Treatment Factor	The percentage of time that the enhanced primary treatment facility ran during wet weather events where the influent flow rate exceeded the EPT event threshold.	≥ 80.0	100.0	1.250
Biogas Utilization Factor	The percentage of biogas utilized, calculated as the volume of biogas produced less the volume flared divided by the volume produced.	≥ 60.0	86.4	1.440
Energy Efficiency Factor	The energy used in all wastewater facilities in kWh divided by the volume of wastewater effluent that either receives ultraviolet (UV) treatment or is membrane plant effluent.	≤ 514	539	0.954
		A	verage Index	1.215
		Index Sta	ndard Points	15.0
	/	Total	Actual Points	18.2
	Maximum Available Po	ints Including I	Bonus Points	16.5
		Total Po	oints Earned	16.5

2021 Highlights

- Enhanced Primary Treatment (EPT) Factor: In addition to proactive replacement of assets nearing end-of-life, EPT clarifiers were proactively cleaned and inspected to minimize clarifier downtime and maximize availability for primary treatment.
- Biogas Utilization Factor: In 2021, heating requirements were slightly lower and overall biogas
 production was slightly higher than planned. Overall, the volume of Biogas utilized and flared in 2021
 was comparable to 2020. However, higher biogas utilization score was still achieved due to lower
 natural gas consumption throughout 2021.
- **Energy Efficiency Factor:** Above average energy consumption and much lower effluent flow volumes resulted in a higher than target Energy Efficiency Factor.

2022 Areas for Improvement

- Enhanced Primary Treatment (EPT) Factor: Planning for proactive replacement of assets nearing end-of-life to minimize unplanned downtime and completion of preventative maintenance activities will continue in 2022.
- **Biogas Utilization Factor:** Operations will continue to focus on maximizing biogas utilization while minimizing natural gas whenever possible.
- Energy Efficiency Factor: During 2022, there will be a continued focus on optimization of secondary aeration blower operation to reduce power demand. In addition, design activities to improve blower performance will continue.

3.4.4 Safety Index

EUI and EWSI are committed to a safe, healthy lifestyle and demonstrate this through care and concern for people. The safety index is a measure of the success of programs and the application of policies that maximize the safety of employees and the public.

Table 3.4.4 Safety Index

Index Component	PBR Performance Measure	Standard	Actual Score	Index		
Near Miss Reporting Factor	The number of near miss reports entered in the ERS system.	≥ 220	253	1.150		
Work Site Inspection Factor	Number of Work Site Inspections and observations completed per year.	≥ 919	1353	1.472		
Lost Time Frequency Factor	The actual lost time frequency rate.	≤ 0.75	0.00	2.000		
All Injury Frequency Factor	The actual all injury frequency rate	≤ 1.50	0.64	2.339		
		Α	verage Index	1.740		
		Index Sta	andard Points	15.0		
Total Actual Points						
	Maximum Available Points Including Bonus Points					
		Total Po	oints Earned	16.5		

2021 Highlights

- Near Miss Reporting Factor: Near miss and hazard identification reporting continued to be an
 effective means to proactively identify hazards and implement corrective actions to mitigate
 potential harm to employees, contractors and members of the public.
- Work Site Inspections / Observations Factor: Work site inspections and observations continued
 to be a successful leading indicator that provided leadership and employees the opportunity to
 engage in field activities, proactively identify areas of improvement, and verify conformance to
 EWSI standards
- Lost Time Frequency Rate Factor: In 2021, Gold Bar exceeded the lost time frequency rate factor by having no lost time events.

 All Injury Frequency Rate Factor: In 2021, Gold bar had only 1 recordable incident when an employee slipped on stairs.

2022 Areas for Improvement

- Near Miss Reporting Factor: Gold Bar will continue with internal monthly promotion for Near Miss and Hazard Identifications reporting. The goal is to promote increased reporting and show employees the impact of site specific reporting and changes.
- Work Site Inspections / Observations Factor: With consideration of the reintegration back into the workplace in 2022, Gold Bar will continue to monitor inspection and observation activities and support proactive field engagements.
- Lost Time Frequency Rate Factor/All Injury Frequency Rate Factor: Gold Bar will continue to review investigation information for causal themes. This will assist in the identification of future direction for communications and activities related to addressing root causes.

3.5 Rates and Bill Comparisons

EWSI's wastewater (combined wastewater treatment, sanitary and stormwater) bill comparisons for 2021 are based on the published sanitary and stormwater rates for Calgary, Vancouver, Winnipeg and Regina, as well as four local communities. These bill comparisons represent the total cost to the customer and include fixed charges, consumption charges and any other applicable surcharges.

Unlike most cities, where wastewater treatment services and drainage services are combined, EWSI's Wastewater Treatment operations is only responsible for wastewater treatment and the operations and maintenance of sanitary, storm and combined sewer systems are provided through EPCOR Drainage Services. Accordingly, wastewater bill comparisons are based on the EWSI's combined wastewater treatment bill and its sanitary and stormwater bills.

3.5.1 Residential Wastewater Bills

Figure 3.6.1 provides a comparison of residential household wastewater bills for residential household consumption of 15.1 m³ per month, the average residential customer consumption per month in Edmonton in 2021.

Figure 3.5.1 2021 Monthly Residential Wastewater Bill Comparison (15.1 m³/month)



Unlike water services which are relatively consistent among cities and communities, the nature and extent of wastewater treatment and drainage services vary significantly between cities and communities due to differences in wastewater treatment processes, the inclusion of certain services in property taxes, and geographic and climatic factors which affect the level of investment in and approach to flood mitigation and stormwater services. In particular, stormwater charges are often included as a component of taxes.

Edmonton's \$61.17 average monthly bill from Figure 3.5.1 includes Wastewater charges of \$20.71 (blue) and Drainage charges of \$40.46 (green, including both sanitary and storm charges). While the total bill is higher than Vancouver, it is lower than Calgary and Regina, the two cities where drainage and wastewater treatment are most comparable to Edmonton. EWSI notes that cities across Canada are experiencing increased risk of flooding related to climate change and that substantial investments are needed to assess and address climate change-related flood mitigation.

3.5.2 Commercial Wastewater Bills

Table 3.5.2 provides a comparison of the drainage and wastewater treatment bills for commercial customer of various sizes. This table shows that drainage and wastewater treatment bills for EWSI's commercial customers are competitive with all of the other surrounding communities and other major cities in western Canada, except for Vancouver.

Table 3.5.2 2021 Monthly Commercial Wastewater Bill Comparison (\$ per month)

		Α	В	C	D
					Extra
	Monthly Bill - \$ per month	Small	Medium	Large	Large
1	Monthly Consumption - m3	10	250	1,000	5,000
2	Vancouver	21.94	338.50	1,377	6,737
3	Calgary	61.09	482.97	1,801	8,833
4	Regina	56.70	511.20	2,120	10,069
5	Winnipeg	45.48	748.75	2,928	14,435
6	Edmonton	41.60	594.92	2,430	12,117
7	St. Albert	76.31	558.71	2,066	10,106
8	Sherwood Park	40.43	482.03	1,862	9,222
9	Stony Plain	73.87	756.94	2,921	14,441
10	Leduc	33.00	501.00	1,964	9,764

4 Drainage Services

4.1 Customers and Consumption

Drainage provides sanitary services to the same customers served by Wastewater Treatment, while Drainage storm customers' charges are determined based on parcel size and other factors. Therefore, actual customer counts, consumption per customer and total consumption are the same as those of Wastewater Treatment and actual to forecast differences in Drainage's customer counts and consumption are attributable to the same factors.

4.2 Financial Performance

As explained in Appendix A.2, the drainage rates set out in Bylaw 18100 reflect EWSI's commitment to limit average annual rate increases to 3% over the period from January 1, 2018 to March 31, 2022. Therefore, there is no City of Edmonton-approved PBR forecast to serve as the basis of comparison for financial performance. Instead, as in 2018 and 2019, Drainage's 2018 EPCOR drainage budget, adjusted to incorporate annual revenue increases of 3% and annual operating expense increases of 2%, serves as a proxy for a PBR forecast, providing a basis for assessing actual financial performance.

Drainage's revenue requirements are summarized on Table 4.2 below. Explanations of forecast to actual variances are provided in sections 4.2.1 to 4.2.6.

Table 4.2

Drainage Revenue Requirements
(\$ millions)

		Α	В	С	D
	Summary of Revenue Requirements		21	2018-2021	
			Actual	Budget	Actual
1	Drainage Rate Revenue				
2	Sanitary utility revenue	137.2	141.3	525.2	517.8
3	Stormwater utility revenue	68.6	81.2	262.5	285.9
4	Drainage Rate Revenue	205.7	222.5	787.7	803.8
5	Drainage Revenue Requirement				
6	Operating expenses	123.4	132.6	473.5	484.9
7	Other revenue	(9.0)	(9.0)	(34.6)	(35.6)
8	Depreciation and amortization	39.8	38.0	137.2	138.9
9	Return on rate base financed by debt	38.1	26.6	120.5	91.5
10	Return on rate base financed by equity	13.5	34.3	91.1	124.2
11	Drainage Revenue Requirement	205.7	222.5	787.7	803.8
12	Return on Rate Base Financed by Equity	2.24%	5.52%	3.92%	5.13%

4.2.1 Revenue

Drainage's rate revenues are derived from both sanitary utility and stormwater utility services. Sanitary utility revenues are comprised of variable monthly charges based on monthly metered water consumption and flat monthly service charges based on the meter size. Stormwater utility revenues are based on

parcel area, development intensity, and run-off coefficients based on the zoning of individual land parcels. Rates for both sanitary and stormwater utility services from January 1, 2018 to March 31, 2022 are prescribed in Bylaw 18100 and incorporate an average annual rate increase of 3%.

Table 4.2.1 below provides a comparison of 2021 and 2018-2021 Drainage revenues to the budget:

Table 4.2.1
Drainage Revenue
(\$ millions)

		Α	В	С	D
	Drainage Revenue	20	21	2018-	-2021
	Diamage Revenue	Budget	Actual	Budget	Actual
1	Sanitary Utility				
2	Flat Monthly Service Charges			/	
3	Residential	38.8	35.5	148.4	132.8
4	Multi-Residential	0.6	2.4	2.1	8.9
5	Commercial	2.9	5.9	11.0	22.5
6	Large Wholesale	0.0	0.0	0.1	0.1
7	Flat Monthly Service Charges	42.2	43.9	161.7	164.3
8	Variable Monthly Charges				
9	Residential	49.5	55.8	189.3	195.3
10	Multi-Residential	19.4	21.3	74.2	75.3
11	Commercial	24.8	19.2	95.0	78.4
12	Large wholesale	• 1.3	• 1.1	• 5.0	• 4.5
13	Variable Monthly Charges	94.9	97.4	363.5	353.6
14	Sanitary Utility Revenue	137.2	141.3	525.2	517.8
15	Stormwater Utility			-	-
16	Residential	36.2	43.0	138.4	153.3
17	Multi-Residential	3.5	4.7	13.5	16.4
18	Commercial	28.9	33.5	110.6	116.2
19	Stormwater Utility Revenue	68.6	81.2	262.5	285.9
20	Drainage Rate Revenue	205.7	222.5	787.7	803.8
21	Other Revenue	9.0	9.0	34.6	35.6
22	Total Drainage Revenue	214.8	231.5	822.3	839.4

In 2021, Drainage's rate revenues were \$16.8 million greater than budget (\$17.1 million greater for 2018-2021). Higher than budget revenues included \$11.7 million in revenues related to non-routine adjustments, including \$6.0 million for CORe, \$4.2 million for SIRP and \$1.5 million for LRT relocations. The remainder of the difference results from higher than forecast customer growth and higher consumption as explained in section 3.2. Besides rate revenues, Drainage has Other Revenue derived from biosolids management services provided to the Alberta Capital Region Wastewater Commission, application and connection fees, wastewater transfer station services, late payment fees, miscellaneous fees pursuant to third party agreements, and other incidental services.

4.2.2 Operating Expenses by Function

Table 4.2.2 below compares Drainage's 2021 actual operating expenses to its budget:

Table 4.2.2
Operating Expenses by Function
(\$ millions)

	A B C D								
	Function		<u>!</u> 1	2018-	-2021				
	Function	Budget	Actual	Budget	Actual				
1	Drainage Operations								
2	Maintenance	31.9	30.6	121.3	112.8				
3	Biosolids	17.4	16.3	67.0	65.9				
4	Monitoring and Compliance	4.4	3.8	17.6	16.3				
5	Other	0.5	0.7	3.7	4.5				
6	Drainage Operations	54.1	51.5	209.5	199.4				
7	Planning and Project Support								
8	Planning	10.6	5.1	43.5	28.2				
9	Project Support	5.3	9.7	15.8	30.7				
10	NRA – SIRP	-	6.7		9.3				
11	NRA - CORe	ı	3.6	-	4.1				
12	Planning and Project Support	15.9	25.0	59.3	72.2				
13	Billing and Meter Reading		/						
14	Meter Reading	6.8	6.6	25.9	26.1				
15	CUS Charges	0.6	(0.5)	2.3	2.9				
16	Billing and Meter Reading	7.4	6.1	28.2	28.9				
17	Drainage Services Administration								
18	Drainage Shared Services	16.0	14.8	60.4	60.1				
19	Incentive and Other Compensation	2.2	3.8	8.6	11.8				
20	Drainage Services Administration	18.2	18.6	69.0	71.9				
21	Corporate Shared Services	16.9	20.0	65.6	70.3				
22	Franchise Fees and Property Taxes								
23	Franchise Fees	9.7	10.2	38.8	38.1				
24	Property Taxes	1.1	1.4	3.2	3.9				
25	Franchise Fees and Property Taxes	10.8	11.5	41.9	42.0				
26	Total Operating Expenses by Function	123.4	132.6	473.5	484.9				

Total operating expenses for 2021 were \$9.2 million greater than budget (\$11.4 million greater for 2018-2021). Key factors contributing to this difference include:

- **Maintenance** \$1.3 million less than budget (\$8.5 million less for 2018-2021). Lower than budgeted expenses are almost entirely attributable to higher than budgeted proportions of staff time charged to capital projects, most notably SIRP and CORe. The remainder of the variance is attributable to numerous minor items, none of which are individually significant.
- **Biosolids** \$1.1 million less than budget (\$1.1 million less for 2018-2021). This function includes the storage and management of biosolids generated by the Gold Bar and Alberta Capital Regional wastewater treatment plants. As in prior years, lower than budgeted expenses reflect lower than planned activity and lower processed volumes.
- Monitoring and compliance \$0.6 less than budget (\$1.3 million less for 2018-2021). Lower than budget expenses reflect lower than anticipated contractor costs of \$0.5 million (\$0.9 million for 2018-2021) and higher recoveries from Gold Bar of \$0.6 million (\$0.6 million greater for 2018-2021), offset by higher staff costs of \$0.5 million (\$0.2 million for 2018-2021).
- **Planning** \$5.5 million less than budget (\$15.3 million less for 2018-2021). This function includes infrastructure, system and administration planning. Lower than budget expenses reflect lower than

anticipated consultant costs by completion of more planning analysis with in house resources of \$2.1 million (\$7.6 million for 2018-2021), capitalization of a higher than anticipated portion of staff costs of \$0.7 million (\$2.1 million for 2018-2021), and lower staff costs net of vacancy factor of \$1.3 million (\$2.6 million for 2018-2021). A savings of \$0.5 million (\$1.0 million for 2018-2021) related to the transfer of the customer services function to Water (now recovered through CUS charges) was also obtained by combining this function for water and drainage within the Water business. The remainder of the 2021 and 2018-2021 variances is primarily attributable to savings of \$0.9 million related to the transfer of lot grading inspection services back to the City of Edmonton in 2018. The lot grading inspection cost savings were offset with a proportionate decrease in associated revenues.

• Project Support - \$4.4 million greater than budget (\$14.9 million greater for 2018-2021). This function includes surveying and engineering (conceptual, preliminary design or detailed design), project management, in-house construction, and emergency repairs. Higher than budgeted expenses include: \$2.5 million of additional salary costs (\$16.2 million for 2018-2021) related to design and construction work that had originally been budgeted as capital expenditures and \$2.0 million of fleet costs (\$2.0 million for 2018-2021. The 2018-2021 variance also includes \$1.5 million of cost resulting from higher equipment utilization in operations and \$1.8 million of higher than anticipated contractor costs, primarily related to project management.

This category of costs illustrates the impact of the differences in accounting treatment between the City of Edmonton and EPCOR. Specifically, the PBR budget was prepared using City of Edmonton's Drainage's capitalization policies, which included capitalizing preliminary design costs (i.e. the costs incurred before there was a specific project). The actual results reflect EWSI capitalization policies, where most preliminary design costs are expensed, and where additional costs – capital overhead, higher salary burden, major inspections, abandonments, etc., are capitalized.

- NRAs for SIRP and CORe \$6.7 million for SIRP (\$9.3 million for 2018-2021) SIRP and \$3.6 million for CORe (\$4.1 million for 2018-2018). EWSI commenced work on these programs following approval for NRAs on December 2, 2019. Additional information on these NRAs is provided in section 1.5.
- Billing and Meter Reading \$1.3 million less than budget (\$0.7 million greater for 2018-2021. The
 favourable variance in 2021 is primarily attributable adjustments to the bad debt provision related to
 the 90 day deferral program. Over the 2018-2021 period, this adjustment was offset by higher than
 budgeted expenses for metering and customer service support costs provided by EPCOR Energy
 Services, as well as unbudgeted call centre support costs from the City of Edmonton.
- Drainage Shared Services \$1.2 million less than budget (\$0.3 million less for 2018-2021). Lower
 than budgeted costs both for 2021 and for 2018-2021 reflect organizational changes in almost all
 administrative functions. These changes are primarily related to Drainage transition and integration.
- Incentive and Other Compensation \$1.6 million greater than budget (\$3.2 million greater for 2018-2021). Higher than budget expenses in 2021 are due to incentive compensation (\$1.3 million for 2018-2021. The 2018-2021 variance also includes \$0.5 million in adjustments to corporate benefits and a \$1.5 million adjustment to long-term disability.
- Corporate Shared Services \$3.1 million greater than budget (\$4.7 million greater for 2018-2021). Higher than budgeted expenses reflect growth in assets and revenue, which are key corporate cost allocators, and increases in corporate IT costs charged directly to Drainage.

• Franchise Fees and Property Taxes - \$0.7 million greater than budget, (\$0.1 million greater for 2018-2021). As with Water and Wastewater, higher than forecast franchise fees reflect higher than forecast revenues for 2021. These increases are partially offset by higher property taxes, which were not included in the budget as no accurate cost estimate was available at the time of budget preparation.

Variances in other operating expense functions and sub-functions are not significant, either individually or in aggregate.

4.2.3 Operating Expenses by Cost Category

Table 4.2.3 below shows operating expenses by cost category for Drainage Operations, Planning, Project Support Costs and Drainage Services Administration, where cost categories differ from the sub-functions in Section 4.2.2.

Table 4.2.3
Operating Expenses by Cost Category
(\$ millions)

		Α	В	С	D
	Cost Category	20	21	2018-	2021
	Cost Category	Budget	Actual	Budget	Actual
1	Drainage Operations	/			
2	Staff Costs and Employee Benefits	27.3	25.6	104.1	100.9
3	Contractors and Consultants	22.1	20.7	84.1	76.8
4	Materials and Supplies	0.2	0.0	0.9	0.3
5	Other	4.5	5.3	20.4	21.4
6	Drainage Operations	54.1	51.5	209.5	199.4
7	Planning and Project Support	/			
8	Staff Costs and Employee Benefits	10.7	17.8	39.7	56.9
9	Contractors and Consultants	4.6	6.0	19.7	16.4
10	Other	0.6	1.3	(0.1)	(1.1)
11	Planning and Project Support	15.9	25.0	59.3	72.2
12	Drainage Shared Services				
13	Staff Costs and Employee Benefits	12.5	14.6	46.7	50.4
14	Contractors and Consultants	5.3	4.9	20.2	17.5
15	Other	0.4	(0.9)	2.2	4.0
16	Drainage Shared Services	18.2	18.6	69.0	71.9

The information presented in this table supports the explanations of differences between 2021 actual and budget expenses provided in Section 4.2.2. Accordingly, no additional explanations are considered necessary.

4.2.4 Depreciation and Amortization

Drainage's depreciation expense and amortization of contributed assets for 2021 are shown in Table 4.2.4 below:

Table 4.2.4
Depreciation and Amortization
(\$ millions)

		Α	В	С	D
Depreciation and Amortization		20	21	2018-2021	
		Budget	Actual	Budget	Actual
1	Provision for depreciation	85.9	82.3	298.2	303.5
2	Amortization of contributions	(46.2)	(44.3)	(161.0)	(164.6)
3	Depreciation, net	39.8	38.0	137.2	138.9

Drainage's net depreciation expense was \$1.8 million less than budget (\$1.7 million greater for 2018-2021). These differences are primarily attributable to both changes in capital programs discussed in section 4.3, as well as changes to depreciation rates resulting from asset componentization and other adjustments needed for regulated accounting following the transfer of Drainage to EPCOR.

4.2.5 Rate Base

Drainage's mid-year rate base, shown in Table 4.2.5 below, is \$45.2 million greater than forecast. This difference, reflected in higher balances of both plant in service and contributed assets, results from reprioritization of capital projects to address urgent needs for emergency repairs and asset rehabilitation, and work on approved NRA programs (SIRP, CORe and LRT Relocations). These changes are discussed in detail in Section 4.3.1.

Table 4.2.5
Mid-Year Rate Base
(\$ millions)

		А	В
	Mid-Year Rate Base	202	1
	Wild-Teal Nate Dase	Budget	Actual
1	Plant in Service		
2	Balance, beginning of year	5,175.1	5,366.8
3	Additions - EPCOR-funded	175.9	186.9
4	Additions – Contributed	200.9	151.2
5	Retirements and adjustments	(15.2)	-
6	Balance, end of year	5,536.7	5,704.9
7	Mid-Year Plant in service	5,355.9	5,535.9
8	Accumulated Depreciation		
9	Balance, beginning of year	1,053.1	1,059.6
10	Depreciation expense	85.9	82.2
11	Retirements and adjustments	(15.2)	(29.4)
12	Balance, end of year	1,123.9	1,112.4
13	Mid-Year Accumulated Depreciation	1,088.5	1,086.0
14	Other Rate Base Items		
15	Working Capital	17.3	18.3
16	Materials and Supplies	1.5	1.1
17	Other Rate Base Items	18.7	19.5
18	Gross Mid-Year Rate Base	4,286.1	4,469.3
29	Contributions		
20	Balance, beginning of year	(3,274.1)	(3,441.1)
21	Contributions in aid of construction	(200.9)	(151.2)
22	Balance, end of year	(3,475.0)	(3,592.4)

		Α	В
	Mid-Year Rate Base	202	1
	Wild-Teal Rate Dase	Budget	Actual
23	Mid-Year Contributions	(3,374.5)	(3,516.8)
24	Accumulated Amortization		
25	Balance, beginning of year	(574.2)	(579.6)
26	Amortization of contributions	(46.2)	(44.3)
27	Balance, end of year	(620.3)	(623.9)
28	Mid-Year Accumulated Amortization	(597.2)	(601.8)
39	Mid-Year Contributions	(2,777.3)	(2,915.0)
30	Net Mid-Year Rate Base	1,508.8	1,554.3

4.2.6 Return on Rate Base

In 2021, Drainage's total return on rate base is \$9.2 million greater than budget (\$4.1 million greater for 2018-2021). In 2019 and 2020, EUI provided one-time preferential financing to Drainage in the form of short term notes at rates between 0.75% and 2.31%. These notes, which will be rolled over to higher cost debt prior to April 1, 2022, reduce the average cost of debt by 1.32% in 2021 and 0.83% over the 2018-2021 period. The low cost of debt, together with significant increases in revenue related to NRAs for SIRP and CORe, have enabled Drainage to earn equity returns in 2021 in excess of its budgeted returns.

Table 4.2.6-1
Return on Mid-Year Rate Base
(\$ millions)

		Α	В	С	D
	Return on Rate Base	20	2021		-2021
	Return on Rate base	Budget	Actual	Budget	Actual
1	Net Mid-Year Rate Base	1508.8	1554.3		
2	Capital Structure				
3	Debt	60.00%	59.38%		
4	Equity	40.00%	40.62%		
5	Total	100.00%	100.00%		
6	Cost Rates				
7	Debt //	4.20%	2.88%	4.00%	3.17%
8	Equity	2.24%	5.42%	3.92%	5.13%
9	Weighted Average Cost of Capital (WACC)	3.58%	3.66%	3.97%	4.06%
10	Return on Rate Base				
11	Debt	38.1	26.6	120.5	91.5
12	Equity	13.5	34.3	91.1	124.2
13	Total Return on Drainage Rate Base	51.6	60.8	211.6	215.7

Returns on rate base are calculated separately for the debt-financed and equity-financed portions of Drainage's net rate base. The rate of return on debt for 2021 and 2018-2021 reflects the "rollover" of City of Edmonton debentures into EUI notes with the same terms and conditions, as well as the preferential financing on short-term notes issued to EUI in 2019 and 2021. The calculation of the average cost of debt is shown in Table 4.2.6-2 below.

Table 4.2.6-2
Interest Expense and Cost of Debt
(\$ millions)

		Α	В	С	D
	Interest Expense and Cost of Debt	20	21	2018-2021	
	interest Expense and Cost of Debt	Budget	Actual	Budget	Actual
1	Interest expense				
2	Interest on short-term debt	1.9	3.1	7.1	6.9
3	Interest on City of Edmonton debentures	18.5	-	57.6	18.1
4	Interest on intercompany debentures	12.5	24.2	38.5	68.1
5	Total interest expense	31.1	27.3	103.2	93.1
6	Mid-year debt				
7	Mid-Year Short-term debt	43.8	28.2		
8	Mid-Year Long-term debt	739.3	919.9		
9	Total mid-year debt	783.2	948.1		
10	Average Cost of Debt	4.20%	2.88%	4.00%	3.17%

4.2.7 Transactions with Affiliates

Drainage derives a portion of its revenues and expenses from transactions with affiliates, including the City of Edmonton, EUI and its subsidiaries. Table 4.2.7 provides a summary of Drainage's 2021 and 2018-2021 transactions with affiliates.

Table 4.2.7
Transactions with Affiliates
(\$ millions)

		Α	В	С	D
	Affiliate and Service		21	2018-	2021
			Actual	Budget	Actual
1	Revenues from the provision of services to the City of				
	Edmonton				
2	Utility Services	2.9	3.0	11.6	8.8
3	Other Revenue	0.9	0.0	3.6	3.5
4	Total /	3.8	3.0	11.4	9.3
5	Services provided by (recovered from):				
6	City of Edmonton				
7	Franchise Fees	9.7	10.2	38.8	38.1
8	Property Taxes	1.1	1.2	3.2	3.7
9	Interest on City of Edmonton debentures	18.5	-	57.6	18.1
10	Other services	7.8	4.7	31.3	29.8
11	Total	37.1	16.1	130.9	89.7
12	EPCOR Utilities Inc.				
13	Corporate Shared Service Costs	17.2	20.3	66.8	71.5
14	Interest on short-term debt	12.5	24.2	38.5	68.1
15	Interest on intercompany debentures	1.9	3.0	7.1	6.7
16		-	0.6	-	-
17	Total	31.6	48.0	112.3	146.4
18	Other Affiliates				
19	EPCOR Energy Alberta LP	3.9	5.0	15.6	18.1
20	EPCOR Distribution and Transmission Inc.	0.9	(0.1)	3.6	8.0
21	EPCOR Technologies Inc.	-	0.5	-	0.3

		Α	В	С	D	
	Affiliate and Service		21	2018-	-2021	
			Actual	Budget	Actual	
22	EPCOR Commercial Services Inc.	-		-	0.7	
23	Other EWSI Business Units	2.0	1.0	8.0	7.6	
24	Total	6.8	6.4	27.2	27.5	
25	Expenditures (Contributions) on capital projects arising					
	from services provided by:					
26	City of Edmonton	(43.1)	(16.6)	(162.3)	(76.9)	
27	EPCOR Technologies Inc.	_	5.3	-	17.9	
28	EPCOR Utilities Inc.	2.3	1.1	7.4	5.3	
29	EPCOR Energy Services	(2.2)	(3.4)	(9.8)	(11.5)	
30	EPCOR Distribution and Transmission Inc.	-	0.1	-	0.5	
31	EPCOR Water Services Inc.	0.2	0.2	0.8	0.9	
32	Total	(42.9)	(13.3)	(163.9)	(63.7)	

4.3 Capital Programs

4.3.1 Capital Expenditures

Drainage's forecast capital program is based on the 2018-2021 long term plan (LTP) included in Grant Thornton report CR_8300, an independent third party report assessing the transition of Drainage from the City of Edmonton to EPCOR. Drainage's 2021 capital expenditures program is summarized in Table 4.3.1 below. Table 4.3.1 provides a comparison of forecast to actual capital expenditures for 2021 and 2018 to 2021 for each program and for each project with capital expenditures in excess of \$10.0 million over the 2018-2021 term, as well as a comparison of total forecast capital expenditures for 2018 to 2021 from the LTP, adjusted for approved Non-Routine Adjustments, to EWSI's current capital projection. Please note that forecast capital expenditures also include capital expenditures approved for Non-routine Adjustments.

Table 4.3.1
Capital Expenditures and Contributions
(\$ millions)

	(\$ minoris)							•
		Α	В	С	G	Н	I	
			2021			2018 - 2021		
	Project Description	Forecast	Actual	Difference	LTP	Actual	Difference	Note
1	Capital Expenditures							
2	Drainage Neighbourhood Renewal	51.8	29.1	(22.7)	175.8	116.2	(59.6)	1
3	Drainage System Expansion	26.9	23.4	(3.5)	84.2	91.1	6.9	2a
4	Drainage System Rehabilitation					/		
5	Groat Rd Trunk S OP-001639-01	-	0.1	0.1	-	34.6	34.6	3a
6	High Priority Replacement Program	14.1	21.2	7.1	54.2	74.2	20.1	3b
7	Projects under \$15 million	17.0	45.4	28.4	65.0	129.5	64.5	3с
8	Drainage System Rehabilitation	31.1	66.7	35.6	119.2	238.4	119.2	j
9	Environmental Quality Enhancement							
10	Kinnard OSS	-	7.8	7.8	-	10.3	10.3	
11	Projects under \$15 million	26.1	6.7	(19.4)	100.8	32.8	(68.0)	
12	Environmental Quality Enhance	26.1	14.5	(11.6)	100.8	43.1	(57.7)	4
13	Flood Mitigation							
14	Tweddle Place OP-001334-01	0.0	4.3	4.3	29.6	18.8	(10.8)	5a
15	Malcolm Twed & Ed OP-001695-01	9.8	20.6	10.8	58.4	24.6	(33.8)	5a
16	Kenilworth Dry Pond	-	0.5	0.5	-	1.1	1.1	
17	Lauderdale West Dry Pond	-	0.0	0.0	-	0.0	0.0	
18	Projects under \$15 million	50.8	22.9	(27.9)	159.5	66.2	(93.3)	5b
19	Flood Mitigation	60.6	48.3	(12.2)	247.5	110.7	(136.8)	
20	SSSF Projects							
21	SESS SW4 OP-001336-01	-	2.6	2.6	-	20.2	20.2	
22	NEST NC2 & NC3 OP-001795-01	- /	9.9	9.9	-	33.5	33.5	
23	SESS SA10A CP-002993-01	/-	7.8	7.8	-	36.5	36.5	
24	SW5	-	0.1	0.1	-	0.4	0.4	
25	Projects under \$15 million	34.9	2.9	(32.0)	137.8	6.0	(131.8)	
26	SSSF Projects	34.9	23.3	(11.6)	137.8	96.6	(41.3)	6
27	NRA - LRT							
28	West Valley LRT	41.5	35.8	(5.7)	55.4	52.2	(3.2)	
29	Metro LRT	0.7	0.2	(0.5)	5.5	7.4	2.0	
30	NRA-LRT Projects	42.2	36.0	(6.2)	60.9	59.6	(1.2)	7
31	NRA - CORe							
32	151S/99A SanTrunk OP-001940-01	-	15.1	15.1	-	23.8	23.8	1
33	Duggan Tunnel Replacement	8.3	0.4	(7.9)	10.4	1.2	(9.2)	
34	Mill Creek Combined	-	0.4	0.4	-	1.1	1.1	1
35	Projects under \$15 million	23.4	20.6	(2.9)	43.3	49.8	6.5	j

		Α	В	С	G	Н	I	
			2021			2018 - 2021		
	Project Description	Forecast	Actual	Difference	LTP	Actual	Difference	<u>Note</u>
36	NRA - CORe	31.8	36.5	4.8	53.7	76.0	22.2	8
37	Real Estate	-	3.0	3.0	ı	21.8	21.8	9
38	Total Capital Expenditures	305.4	280.9	(24.5)	980.0	853.6	(126.4)	
39	Contributions							
40	Drainage System Expansion	(16.2)	(5.6)	10.6	(60.1)	(22.0)	38.1	2b
41	Flood Mitigation							
42	Malcolm Twed & Ed OP-001695-01	-	(6.8)	(6.8)	-	(8.6)	(8.6)	
43	Projects under \$15 million	-	(2.2)	(2.2)	-	(7.2)	(7.2)	
44	Flood Mitigation	-	(8.9)	(8.9)	1	(15.7)	(15.7)	5c
45	SSSF							
46	SESS SW4 OP-001336-01	-	(2.5)	(2.5)	-	(20.1)	(20.1)	
47	NEST NC2 & NC3 OP-001795-01	-	(9.7)	(9.7)	/-	(33.4)	(33.4)	
48	SESS SA10A CP-002993-01	-	(7.8)	(7.8)		(36.5)	(36.5)	
49	SW5	-	(0.1)	(0.1)	-	(0.4)	(0.4)	
50	Projects under \$15 million	(34.9)	(1.4)	33.6	(137.8)	1.2	139.0	1
51	SSSF Projects	(34.9)	(21.5)	13.4	(137.8)	(89.2)	48.6	6
52	Total Contributions	(51.2)	(36.1)	15.0	(197.9)	(126.9)	71.0	
53	Capital Expenditures, Net	254.3	244.8	(9.5)	782.1	726.6	(55.4)	

Table 4.3.1 shows that despite the challenges posed by the COVID-19 pandemic, Drainage undertook an extensive capital program in 2021. Both actual and projected expenditures differ significantly from the LTP as Drainage (1) focused its resources on addressing critical needs for drainage system rehabilitation that had not been identified in the LTP; (2) re-evaluated flood mitigation projects in line with SIRP strategy; and (3) undertook capital projects to address needs identified in Non-Routine Adjustments approved for CORe and LRT relocations.

Explanations for significant differences between the LTP and Drainage's current projections for 2018 to 2021 are as follows:

- 1. **Drainage Neighbourhood Renewal** 2018-2021 \$59.6 million less than LTP. This category includes the costs of neighbourhood drainage asset renewals and is aligned with the timing of the City of Edmonton's Building Great Neighbourhoods program. Lower than LTP spending reflects a reduction in sewer upgrading costs due to fewer locations requiring upgrades in the neighbourhoods that were the focus for construction by the City based on a risk of failure analysis and CCTV inspection of pipes with these locations. Lower cost SIRP strategy options including low impact development and inflow/infiltration reduction programs were also aligned with neighbourhood work at a lower cost than traditional full pipe replacement or relining.
- 2. **Drainage System Expansion, net of contributions** 2018-2021 \$45.0 million greater than LTP.
 - a. Capital expenditures –2018-2021- \$6.9 million greater than LTP. Increases in 2018-2021 projected expenditures in this partially-contributed program are primarily due to higher service connection costs reflecting increases in non-standard connections and capitalization of the costs of private development construction project services provided by City of Edmonton staff.
 - b. Contributions 2018-2022 \$38.1 million less than LTP. These decreases are primarily attributable to the removal of contributions from local improvement fees following the Drainage transfer.
- 3. **Drainage System Rehabilitation Projects** 2018-2021 \$119.2 million greater than LTP.
 - a. **Groat Road Storm Trunk Rehabilitation** 2018-2021 \$34.6 million greater than LTP. This project, completed in 2021, was originally planned to be complete prior to Drainage transfer but due to project complexity, design took longer than expected.
 - b. **High Priority Replacement Program** 2018-2021 \$20.1 million greater than LTP. The additional costs in this program result from asset inspections, which identified higher than anticipated volumes of assets meeting criteria for high priority replacement.
 - c. **Drainage System Rehabilitation Projects < \$15 Million** 2018-2021 \$64.5 million greater than LTP. Increases in the costs of these projects are primarily due to the large number of emergency projects requiring immediate rehabilitation, including the void at 109th Street and 61st Avenue. This also reflects the increased need for rehabilitation of aging drainage infrastructure resulting in increased scope on the local sewer rehabilitation program to include catch basin leads

EPCOR Water Services Inc. PBR 2017-2021

and service connections as well as the new manhole catch basin program and proactive service relining project, as well as vehicle and fleet replacements that had been included in Drainage System Expansion in the LTP.

- 4. Environmental Quality Enhancement 2018-2021 \$57.7 million less than LTP. This category includes projects that mitigate the impacts of the drainage system on the environment, including sewer overflows, river loading, and reuse of biosolids. Actual and projected expenditures in this category have been reduced significantly due to the incorporation and reassessment of the River for Life, Mill Creek End of Pipe Facility and Enhanced Biosolids projects as part of the re-prioritization of environmental projects within the SIRP strategy. The SIRP strategy has incorporated these environmental quality objectives.
- 5. **Flood Mitigation, net of contributions** 2018-2021 \$152.5 million less than LTP.
 - a. **Malcolm Tweddle and Edith Rogers Dry Ponds** 2018-2021 \$44.6 million less than LTP. Expenditures on this multi-year project have been deferred first due to delays in finalizing land agreement in 2019, then from weather-related pauses in construction and delays on the City's LRT construction which impacted sewer installations.
 - b. Other Flood Mitigation Projects \$92.2 million less than LTP. This category includes development of drainage infrastructure and program improvements to decrease flood risks. As described in Section 1.5, Drainage has consolidated management of flood mitigation projects under SIRP. The projected underspend is consistent with 2018, 2019 and 2020 reporting and reflects re-evaluation of flood projects in line with the SIRP strategy combined with delays in land acquisition in accordance with the City of Edmonton's new City consultative process.
 - c. Flood Mitigation Contributions 2018-2021 \$15.7 million greater than LTP. These contributions represent provincial and federal grant funding in respect of flood mitigation projects. Separate presentation of these contributions, rather than netting the grants against the related project reflects a change in the treatment of grant recoveries following the transfer of dry pond structure ownership to Drainage.
- 6. Sanitary Servicing Strategy Fund (SSSF) Projects, net of contributions \$7.3 million greater than LTP. The SSSF provides for developer financing of major sanitary trunk construction to service new development areas. Drainage works with the SSSF Management Committee to coordinate design, construction, schedules and budgets for various projects. While significantly less than the City LTP amounts, Drainage's current projected expenditures, align with the SSSF Management Committee's five year construction plan (2018-2022) to support orderly, cost-effective development. Drainage is currently reviewing the timing and requirement of future SSSF trunks with the SSSF committees considering changing sewerage generation patterns in the City and the new City Plan. The major projects in this category are fully funded through the SSSF. The unfunded amounts represent EWSI's annual contributions to the SSSF
- 7. **NRA-LRT Relocations** 2018-2021 \$1.2 million less than NRA approval. Capital expenditures on these projects vary only slightly from the NRAs approved by City Council, primarily due to rescheduling to align with the latest City construction plans on the West Valley LRT.

8. **NRA-CORe** – 2018-2021 – \$22.2 million greater than NRA approval. Higher than NRA-approved costs reflect the inclusion of the costs of the large trunk program previously planned under Drainage System Rehabilitation in the CORe program. Rehabilitation of large sanitary trunks are primarily driven by the requirement to address corrosion and odour issues.

9. Real Estate Consolidation Project (new project) - 2018-2021 - \$21.8 million. Following the transfer of Drainage to EPCOR, an EPCOR-wide real estate review was undertaken to identify and evaluate alternatives for consolidating Water Distribution and Transmission and Drainage's operations and maximize the contribution to the cost reduction and efficiency commitments made as part for the Drainage transfer. This project, expected to be completed in 2022 at a total cost of approximately \$33 million, consolidates the many physical locations occupied by Water and Drainage and will provide operational cost-savings reflected in the 2022-2024 PBR. Projected expenditures are supported by a comprehensive business case submitted with Drainage's 2022-2024 PBR Application.

4.3.2 Construction Work in Progress

Drainage's rate base consists of plant in service. If a capital project is not completed (i.e. not placed into service) in the year, the capital expenditures on that project remain in Construction Work in Progress and are excluded from the rate base. Because of the long time frames required to complete large, complex projects, Drainage has larger balances of Construction Work in Progress than Water or Wastewater. Drainage's construction work in progress is summarized in Table 4.3.2 below:

Table 4.3.2
Construction Work in Progress
(\$ millions)

		Α	В	С	D
Construction Work in Progress		2021		2018	-2021
		Budget	Actual	Budget	Actual
1	Balance, beginning of year	146.2	71.3	32.8	32.8
2	Capital expenditures	254.3	242.9	782.1	728.0
3	Cancelled costs, write-offs and adjustments	-	1.9	-	(2.4)
4	Capital additions	(175.9)	(186.9)	(590.3)	(629.2)
5	Balance, end of year	224.6	129.2	224.6	129.2

The PBR allows Drainage to capitalize the costs of financing certain projects remaining in Construction Work in Progress, using an allowance for funds utilized during construction (AFUDC). In 2021, AFUDC included in capital expenditures on eligible projects amounted to \$3.9 million (\$10.7 million for 2018-2021).

4.4 Operational Performance

On February 19, 2020, City Council approved amendments to Bylaw 18100. These amendments provide for the introduction of new PBR performance metrics, scoring and penalties beginning in 2020. The new proposed PBR metrics program is effective for the remainder of the PBR term (2020 and 2021), and is patterned after the water and wastewater PBR metrics and meets the requirements of the Letter of Intent developed for the transition of Drainage Services from the City to EPCOR.

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4.4.1 Environmental Index

The environmental index measures the success of Drainage's programs and policies designed to mitigate and report adverse environmental impacts.

Table 4.4.1 Environmental Index

	Index Component	PBR Performance Measure	Standard	Actual Score	Index
1	Stormwater Flow and Flow Monitoring	The percentage of storm drainage area monitored.	≥ 63.0	65.3	1.037
2	Environment Incident Management	The actual number of reportable environmental incidents.	≤ 50	16	3.125
3	Green Hectares	Number of hectares with runoff managed by green infrastructure.	≥ 22.0	18.0	8.190
			Aver	age Index	1.660
			Index Standa	ard Points	30.0
			Total Act	ual Points	49.8
		Maximum Available	Including Bor	nus Points	33.0
			Total Point	ts Earned	33.0

2021 Highlights:

- **Stormwater Flow and Flow Monitoring:** Detailed design of 6 monitoring sites and tendering for construction was completed during 2021.
- Environment Incident Management: Reportable environmental incidents decreased from 34 in 2020 to 16 in 2021. This reduction was attributed to decreases in number and intensity of precipitation events in 2021, proactive pre-identification of environmental hazards and risks during project planning, and improved field management of internal releases that minimized escalation to reportable incidents.
- Green Hectares: Although the Green Hectares target was below target in 2021 due to shifting in timing to 2022 for some of the construction coordinated with other capital projects, progress to improve future performance was carried out. This included development of Low Impact Development (LID) design standards and practices in conjunction with City of Edmonton teams, standardized scopes of work, and processes to improve project consistency. Process improvement sessions were also held for work on road Right-of-Way projects which resulted in LID being successfully incorporated in several neighbourhood renewal projects. Outreach to the commercial sector also occurred to identify additional locations for LID installation beyond coordination with City roadwork construction.

2022 Areas for Improvement

Environment Incident Management: In 2021, there were several significant third party
environmental incidents at storm water management facilities. In 2022 response plans and
information sheets are being drafted for storm water management facilities to streamline response
and proactively identify response points (e.g. control structure gate details, potential boom locations,
inlets and outlets and upstream and downstream isolation points).

• **Green Hectares:** In 2022, LID standards and process development will continue. An LID training program for contractors is also being developed. Development of a management of change process to evaluate and approve additional LID products and suppliers, including underground storage products to enhance the number of Green Hectares installed will continue. There will also be efforts to increase the number of installations on commercial and industrial privately owned properties. Finally, a targeted communications strategy including clear agreements around the operations and maintenance of the facilities is a goal of 2022.

4.4.2 Customer Service Index

The Customer Service Index is a composite measure of the customers' perception of satisfaction with EWSI service, the speed of response and quality service level to customer issues.

Table 4.4.2
Customer Service Index

				Actual	
	Index Component	PBR Performance Measure	Standard	Score	Index
1	Service Maintenance	The percentage of service			
	Calls	maintenance calls resolved within 24	≥ 80.0	95.7	1.197
		hours.			
2	Emergency Dig Ups -	The percentage of emergency dig ups			
	Service Restored	services restored within 48 hours from	≥ 98.0	88.9	0.907
		time received from operations.			
3	Service Connections	The percentage of service connection	≥ 85.0	69.1	0.813
		meeting the 6 week target.	2 00.0	09.1	0.013
4	Sewer Odour Hotspots	The percentage of the city area with	≥ 16.7	10.1	1.661
		odour hotspots.	2 10.7	10.1	1.001
Average Index					1.144
Index Standard Points					20.0
Total Actual Points					22.9
Maximum Available Including Bonus Points					22.0
Total Points Earned					22.0

2021 Highlights:

- Service Maintenance Calls: Despite the ongoing challenges associated with accessing customers homes during the pandemic, Drainage achieved better than standard performance. This was achieved primarily by altering shift schedules to align with call volume trends. Additionally, a standby schedule was introduced to better accommodate responses to sporadic weekend, evening calls.
- Emergency Dig Ups Service Restored: The COVID pandemic adversely impacted Drainage construction in two main ways - decreased crew availability and adjustments to site-working conditions. As a result, 4 services of 44 resulted in average restoration time not meeting the PBR standard.
- **Service Connections:** The COVID pandemic adversely impacted Drainage construction in two main ways decreased crew availability and adjustments to site-working conditions. This, in addition to a

significant increase in number of services (477 in 2020 to 578 in 2021) resulted in 72 locations not meeting the 6-weeks target.

Sewer Odour Hotspots: City-wide tracking of odours was accomplished through air monitoring at
over 150 locations. This included assessment of odours emanating from every pump station in
service. 16 long-term monitoring stations were installed and manhole and trunk inspections were
completed on priority trunks to inform cleaning priorities. CORe monitoring planning was also
integrated in the Sanitary Integrated Resource Plan monitoring to optimize construction costs through
sharing of communication equipment.

2022 Areas for Improvement

- Service Maintenance Calls: Technical training focused on efficient work practices will continue to
 be reinforced during 2022. This will allow crews to provide all services during first response which in
 turn will reduce re-work and customer inconvenience. Additional equipment tailored to smaller scale
 jobs will also be introduced. This is expected to decrease response time and thereby increase the
 number responses during a standard shift.
- Emergency Dig Ups Service Restored and Service Connections: Alternate systems and equipment for preparing trench construction are being investigated and implemented to reduce time required to complete work and restore services.
- **Sewer Odour Hotspots:** To ensure on-going prevention of odour and corrosion, CORe will continue to reassessing mitigation and odour control needs across the City.

4.4.3 Reliability and Optimization Index

The System Reliability Index is a measure of the confidence that customer can place in the reliability of the drainage sanitary and stormwater systems.

Table 4.4.3

				Actual	
	Index Component	PBR Performance Measure	Standard	Score	Index
1	Blocked Sewers	The number of blocked sewers per 100km of sanitary/combined pipe.	≤ 2.10	2.70	0.787
2	Sewer Renewal	The km of sewers renewed / relined.	≥ 60.0	47.3	0.788
3	Infrastructure Condition Rating – Min Level	The percentage of all infrastructure (including non-linear) assessed at or above the minimum level of condition rating.	≥ 90.0	90.4	1.004
4	4 Full Property Flood Proofing Inspections The number of inspections completed. ≥ 750 669		669	0.892	
Average Index			e Index	0.868	
Index Standard Points				35.0	
Total Actual Points				30.4	
Maximum Available Including Bonus Points			38.5		
Total Points Earned			30.4		

2021 Highlights:

- Blocked Sewers: There was an increase in blocked sewers resulting from inappropriate wastes
 (specifically flushable wipes) flushed into the system compared to previous years. This was attributed
 to the large number of people continuing to work from home in 2021. There was also an increase in
 construction related blocked sewers due to debris from road construction being introduced into the
 sewer system. The issue of proper debris management during the Road Renewal Projects has been
 raised with project managers and contractors.
- Sewer Renewal: Sewer renewal and relining are proactive maintenance activities. The PBR target
 of 60km of sewers renewed or relined was not met due to emergency rehabilitation work in other
 areas of the system to restore service to customers.
- Infrastructure Condition Rating Min Level: The standard was met taking into account the quantity and conditions of assets assessed. Rehabilitation programs and ongoing investment in higher value critical assets this year, such as large trunk lines, can be expected to contribute favourably to future ratings as many of these are multi-year projects.
- Full Property Flood Proofing Inspections: Despite the challenges of entering individual properties
 brought about by the pandemic, the Flood Prevention Team completed 669 full flood prevention
 inspections at single home residential properties in 2021. Additionally, 700 multi-family property (i.e.
 condominium) inspections were completed. While these were not included in the performance
 measure for 2021, they identified the need to include this building form in future metrics. The SIRP
 strategy supports flood proofing inspections for all property types in Edmonton, with this performance
 measure focused on the single family home.

2022 Areas for Improvement

- **Blocked Sewers:** A flushing program review will continue during 2022. In addition, communication strategies related to ongoing sewer blockages by grease are planned for 2022
- **Sewer Renewal:** The focus on Drainage Services sewer infrastructure renewal will continue to proactively reduce future emergencies.
- Infrastructure Condition Rating Min Level: Odour Control facilities will be added to the current
 inventory of infrastructure. Capital projects which include Large Trunk Line rehabilitation and riskbased local sewer rehabilitation of poor condition assets during 2022 can also be expected to improve
 system condition. Renewal records are also being updated to ensure the most current information is
 available for calculating ratings.
- Full Property Flood Proofing Inspections: The program continues to explore and implement
 optimization opportunities as knowledge of stormwater basins through SIRP continues to evolve.
 Areas of focus for 2022 will include additional outreach to properties within high risk flood basins,
 updated inspections and processes to align with industry best practices and re-engagement with
 previously inspected properties to measure and trend both engagement and completion of
 recommended flood prevention actions.

<u>Proposed Change to the Full Flood Inspection Metric</u>

When first introduced in 2020, the Full Flood Inspection metric was defined as full inspections where a report of recommended improvements was developed. Full inspections were further defined as excluding partial inspections such as backwater valve installation confirmation and exterior only check-ups. With the implementation of the inspection programs, it has been determined that a strict application of this definition does not work for multi-family or commercial premises. Specifically, we are unable to complete a full interior inspection for multi-family residential properties and commercial properties as some elements require a more complex assessment with the building operator and are beyond the expertise of the flood inspection team within EPCOR (elevator shafts, mechanical rooms, etc.). There is unclear ownership between the property management company and the individual owner on any recommendations for interior components, further complicating the completion of a full interior and exterior inspection report for these building types. As a result, EWSI is proposing to adjust the metric as follows:

Commencing for 2022 reporting, the Full Flood Inspection metric will be based on full single family residential inspections (i.e. comprised of both interior and exterior inspection components) and full multifamily residential inspections (i.e. comprised of only exterior inspection components) with the completion of the report of recommended improvements. The metric will continue to exclude backwater valve installation confirmation only appointments. The current performance standard of 750 inspections per year will remain.

4.4.4 Safety Index

The Safety Index is a measure of the success of programs and the application of policies that maximizes the safety of employees and the public.

Table 4.4.4 Safety Index

				Actual	
	Index Component	PBR Performance Measure	Standard	Score	Index
1	Near Miss Reporting	The number of near miss reports	≥ 750	2304	3.072
	Factor	entered in the ESS system.	2 7 30	2504	3.072
2	Work Site Inspection	Number of Work Site Inspections			
	Factor	and observations completed per	≥ 1300	2149	1.653
		year.			
3	Lost Time Frequency	The actual lost time frequency rate.	≤ 0.75	0.35	2.170
	Rate		⊒ 0.73	0.55	2.170
4	All Injury Frequency	The actual all injury frequency rate	≤ 4.00	3.11	1.286
	Rate		= 4.00	5.11	1.200
Average Index			2.045		
Index Standard Points				15.0	
Total Actual Points				30.7	
Maximum Available Including Bonus Points			16.5		
Total Points Earned			16.5		

2021 Highlights:

- Near Miss Reporting Factor: Communications regarding the importance of near miss reporting has
 resulted in Drainage exceeding the performance target. Communication processes were also
 improved to facilitate sharing of learnings from reported near misses across all areas of the business.
- Work Site Inspections Factor: Similar to near miss reporting, there has been on-going
 communications of the importance of performing work site inspections and observations. Resulting
 reports were reviewed by leadership on a monthly basis. Real time visibility via a results dashboard
 also provided a means to track corrective action activities stemming from inspections and
 observations to allow for timely completion.
- Lost Time Frequency Rate: Drainage continued to use the Modified Work Program and Injury
 Management Procedure introduced in 2020 to allow injured employees to work in a modified capacity,
 rather than to be off work. Drainage also initiated a manhole project aimed at reducing recurring
 injuries for specific work activities. This included the development of resources for employees,
 ergonomic assessments and implementation of better tools for the task.
- **All Injury Frequency:** Similar to the Lost Time Frequency metric, in 2021, Drainage continued to investigate injuries to determine root causes and to develop corrective actions to prevent recurrences.

2022 Areas for Improvement

- Near Miss Reporting Factor: In 2022, Drainage will be incorporating trend analysis of reported near misses to further reinforce the contribution of near miss reporting in reducing and / or eliminating workplace injuries.
- Work Site Inspections Factor: In 2022, Drainage will continue to implement the dashboard to
 ensure inspections and observations continue to be done as required. Trending analysis from near
 miss reporting will be used for focused inspections and observations to further drive injury elimination
 and reduction.
- Lost Time Frequency Rate: In 2022, Drainage will investigate an ergonomic assessment tool as well as exoskeleton technology to see if these applications can be implemented to eliminate or reduce specific ergonomic injuries related to specific manual tasks.
- All Injury Frequency: Similar to the Lost Time Frequency metric, in 2022, Drainage will continue to
 investigate injuries to determine root causes and to develop corrective actions to prevent recurrences.
 Drainage will also assess an alternative root cause analysis methodology to see if it will improve
 incident investigations and prevent reoccurrence.

4.5 Rates and Bill Comparisons

Unlike most cities, where wastewater treatment services and drainage services are combined, EWSI currently has separate bills for wastewater treatment services and for drainage services. Accordingly, in order to provide a better basis for comparison with other cities and communities, bill comparisons in Section 3.5 utilize EWSI's blended wastewater treatment and drainage bills.

5 2021 Annual Operating Plans

Water Services presented the 2021 Annual Operational plan to Utility Committee on February 5, 2021. The purpose of that document was to provide Edmonton City Council, Utility Committee and stakeholders a high level perspective of the major activities and initiatives that Water Services would undertake during 2021. As with the preceding year's plan, the 2021 Plan recognized that a significant number of initiatives were common to both the water and drainage business units. These initiatives were intended to drive synergies and efficiencies and to align the two businesses operationally. As a result, the plan was structured in three major sections: 1) Common Initiatives that are being pursued by Water Services and Drainage Services collaboratively, 2) Water Services' specific initiatives and 3) Drainage Services' specific initiatives. In all three areas, initiatives planned for 2021 were organized within six strategic focus areas:

- 1. Customer Service
- 2. Public Health and the Environment
- 3. Employee and Public Safety
- 4. Employee Development
- 5. Operational Performance
- 6. Growth and Financial Performance

The intent of this section of the PBR Progress Report is to provide an update of progress on the 2021 Operational Plan. All initiatives have been described as either: 1) Completed, indicating that the activities are finished and the initiative is closed, 2) In-progress, indicating that work continues and the initiatives has been continued in the 2022 Operational Plan (as many initiatives are multi–year), or 3) On-going, indicating that the initiatives will never be formally completed as business requirements continue to change (e.g. operational improvement). Some initiatives planned for 2021 were delayed from the original timelines due to the impact of the COVID pandemic. This has resulted in many continuing in 2022 and are therefore designated as on-going in the charts below.

5.1 Water and Drainage Services – Common Initiatives

Initiative	Year End Status
Customer Service	
Implement the Service Optimization Project The final stages of this multi-year project will review how customer service is measured in other EPCOR business units and include an assessment of how EPCOR's website can be further optimized from a customer perspective. Water D&T will also cross train and amalgamate existing water customer service groups. The other primary focus is optimizing the recently implemented billing system and ensuring staff	Complete. The PBR customer service metric review was completed and the final metric approved in the PBR application was aligned with other EPCOR business units (and the AUC approach) to ensure comparability. The customer service groups have been amalgamated and training was completed ensure all staff effectively utilized the new billing

Initiative	Year End Status
are trained and able to provide a positive	system that was implemented in late 2020.
customer experience.	Further enhancements are planned.
Review Developer Funding Mechanisms to	In-progress – EWSI postponed further
Align Approaches Across all Business Units	development of this initiative during 2021 as it
Capital investments required to support new	was not intended to be part of the PBR
development across the city are allocated	applications that occurred at that time. The
between developers and ratepayers differently	initiative has now been included in current work
across EPCOR's various lines of business.	with City Administration and developers as part
EWSI is drafting a white paper to establish cost	of a larger discussion on the City's Growth
minimization, cost allocation and regulatory	Management plan. The final proposed approach
principles to be applied in its approach to funding	will be presented to Utility Committee as per their
water and drainage infrastructure required to	request.
support growth.	

Public Health and the Environment

Enhance the Climate Adaptation/River Flooding Resiliency Plan

The Climate Change Adaptation action plan has identified 15 key risks for the Edmonton water treatment plants (WTP), water transmission and distribution systems and the Gold Bar Wastewater Treatment Plant (WWTP) that will be significantly affected by climate change. Initial risk mitigation strategies and specific actions were developed for each of these risks. River flooding was identified as the greatest of the sudden onset risks for the Edmonton facilities.

In-progress – A comprehensive climate change strategy was developed in 2018 and has served as the basis for initiatives since that time. In 2021, the strategy continued to be operationalized through a number of subprojects. All of the risks on the water system associated with climate changes were reviewed and will continue to be on an annual basis. As part of the PBR applications, capital projects were approved to mitigate flood risks at the plants. Continuation of the SIRP strategy and its associated projects was also approved. The implementation of these projects will continue for several years beyond 2021. Stakeholder engagement is currently underway for some of these projects. The development of an outward looking document that can be shared with key stakeholders such as the City of Edmonton Council and Administration, Alberta Environment and Parks, and others was postponed to 2022.

Execute Green Energy Purchase Agreement In addition to the kīsikāw pīsim Solar Farm, another key component of Water Services' strategy to reduce its environmental footprint is to explore a competitive procurement for new renewable power from other Alberta sources for

In-progress – In 2020, EPCOR Utilities Inc. signed an agreement with Renewable Energy Systems Canada ("RES") to develop and construct a new wind farm in southern Alberta. EPCOR will acquire the Renewable Electricity Certificates ("RECs") from the project for a 20 year term. The combination of this offtake

Initiative	Year End Status
the remainder of the grid sourced electricity currently used by water operations.	agreement and the kīsikāw pīsim Solar Farm will result in EPCOR Water utilizing 100% green electricity for all its operations within the City of Edmonton. This initiative was included in the PBR applications as was approved as part of the overall application approval. The wind farm is expected to be operational in Q1 of 2022.
Improve Understanding of the Impact of Residuals Develop a strategy for the continued reduction of residuals loading to the North Saskatchewan River. This strategy will revisit options for the potential diversion of water treatment plants residuals to sanitary sewer, landfill or other solids disposal and will explore opportunities to further reduce solids loading to the river and expanding water plants residual solids management to other seasons. EWSI will study the net environmental benefit of various options.	In-progress – In 2020, a Sustainable Return-On-Investment (SROI) study was completed with multiple stakeholders, including AEP, the CoE and the NSWA. The SROI study examined options for construction of facilities at the water treatment plant that would treat the residuals on site and divert to dewatered residuals to landfill for disposal. Based on a Triple Bottom (TBL) assessment, EWSI has concluded that the costs (financial, environmental and social) of on-site treatment strategies far outweigh the environmental benefits. The SROI study also revealed that information on the environmental impact of the discharges on the river was incomplete. EWSI's has developed and proposed a residuals strategy to Alberta Environment and Parks in the 2021-2031 operating renewal application. The strategy is focused on developing more detailed evaluation of the residual discharges, which is planned for 2022 implementation and will inform future
Develop an Integrated Watershed Management (IWM) Strategy for Edmonton - The objective of the IWM strategy is to manage total loadings to the NSR from all municipal discharges in Edmonton and to ensure drinking water security and source water protection for the Edmonton water supply in one unified watershed management program.	In-progress – In 2020, a joint Drainage and Water committee were established to explore, define and potentially implement opportunities in the development of an IWM, which were ultimately defined within a strategy document and detailed implementation plan. In 2021, portions of strategy commenced implementation including the SIRP Slow programs which are intended to enhance source control to deter the release of sediment to Edmonton's storm system from urban development and/or construction The strategy will be expanded in 2022 to include the broader watershed stakeholders including regional municipalities, counties and indigenous groups. This work is foundational to the planned

Initiative	Year End Status
	discussions with Alberta Environment and Parks on integrated watershed management in order to establish the strategic objectives and requirements for the 2025 renewal of the Edmonton wastewater system approval.

Employee and Public Safety

Develop and Implement Company-wide Standard operating procedures for all High Hazard activities.

EWSI will develop and implement company-wide assessments for six of the lifesaving rules as well as chemicals to review existing procedures to ensure conformance to the EPCOR Standards and provincial legislative requirements. This review will increase the layers of protection for our people and assets.

On-going – the initial development has commenced with a focus on ensuring conformance to both EPCOR Standards and provincial legislative requirements. Future work will expand this foundation to the other rules. This initiative is being developed in conjunction with the competency program described below. Additional modules will be develop over time.

Implement Contractor Management and Incident Management Response Procedures

Contractors are required to adhere to the same safety standards as EPCOR employees. This initiative will review processes and procedures to advance that objective.

On-going - Standardized HSE evaluation criteria for contractor awards have been established. The next step in this implementation will be monitoring the effectiveness of those standards, which will be completed through 2022 and beyond. Additional contractor initiatives are underway including the implementation of a compliance tracking took to ensure EPCOR Owner's representatives are completing and overseeing the critical tasks.

Employee Development

Improve Employee Engagement and Build a Respectful, Inclusive, Collaborative, Safe and Healthy Work Culture – EWSI will pursue a variety of activities through the Diversity Council including increasing awareness of diversity and inclusion at EPCOR, incorporating diversity into hiring practices, supporting employee resource groups and working with Careers: The Next Generation to provide work opportunities for indigenous youth.

On-going – The original Diversity Council, established in 2020, has continued to expand its mandate and is now the EPCOR Diversity, Equity & Inclusion (DEI) Council. That council has developed a framework and strategy with the primary goals of establishing: 1) a diverse workforce that is reflective of the differences among people in the communities we serve, 2) an inclusive workplace that respects, values and leverages different opinions, beliefs, lifestyles and experiences and 3) employees that feel valued, engaged and enabled to professionally and personally succeed. In addition, 6 employee

Initiative	Year End Status
	resource groups have been established. These are grassroots groups formed by employees who share a common diversity characteristic (e.g. gender, ethnicity or race, sexual orientation, disability, education, geography etc.) or consider themselves an ally of that diversity community.
Develop and Implement Company-Wide Competency Based Training for All High Hazard Activities – Competency training will include fall protection, hazardous energy isolation, confined space and lifting devices.	On-going – work has continued with a focus on Ground Disturbance and Hazardous Energy Isolation procedures. The intent is to address the areas sequentially in order to ensure subsequent modules reflect the learning gained in the initial development.
Develop Our Employees for the Future To ensure a strong pool of talent now and into the future, this program will identify suitable candidates for job-to-job or project-to-project opportunities and support all aspects of the transition.	On-going – In 2019, EPCOR initiated a Professional Growth Initiative assessment and associated development plans for people leaders at the higher stratums in the organization. The implementation of this program has continued through successively lower stratums and with some initial participants are now going being resurveyed. Formal employee rotation slowed due to the challenges related to the COVID pandemic.
Operational Performance	
Implement a Standardized Process Improvement Methodology This initiative will develop standardized processes or continuous improvement programs to support productivity increases and service quality improvements. The program will encompass methods, techniques and tools and be used to design, control and analyze both business and operational processes. It is critical that any approach chosen involves the people aspect of the process and integrates processes and systems.	On-going – a team with six sigma credentialed employees has continued to develop the process improvement discipline and conduct process improvement projects. This has been supported by the development of a consistent set of tools to conduct process improvement initiatives as well as educational materials to foster a process improvement orientation across the organization. Several process improvement projects have been identified and are under development with a particular focus on the opportunities resulting from the move to the Aurum facility.

Implement the Organizational Project
Management Office (OPM) Initiative – This
initiative will standardized the way project
managers plan, execute and monitor their
projects and programs. It involves creation of a

On-going – a cross organizational team has been formed to review project management processes across all business units of EPCOR. The group has identified common process and re-developed many of the supporting documents. More detailed process modelling is currently

Initiative	Year End Status
project management methodology along with several processes, tools and templates	underway as part of the introduction of the process into the respective business units.
Develop and Implement Strategies for Realizing Synergies between Water and Drainage – The initial focus of this initiative has been on integrating Drainage into EPCOR processes. Recent activities have focused on cross functional teams meeting to identify and prioritize efficiency opportunities in the areas of planning, capital and operations.	On-going – several short term opportunities for synergies have been identified and implemented. Detailed analysis has been completed to address larger opportunities to move towards a more consolidated approach across water and drainage. Central to this assessment is the planned consolidation of the drainage and water D&T teams at the new Aurum site. A number of specific opportunities related to that move were identified in 2020 and they are currently under development. These initiatives will be rolled—out over the next 1-3 years

Growth and Financial Performance

Contribute to the "Utility of the Future" Initiative

The Utility of the Future is an ambitious path to modernize operations and reduce long term operating costs by leveraging technology and processes used and refined by leading water utilities around the world. This Corporate initiative will provide a roadmap and framework identifying potential opportunities to implement emerging technology solutions and processes in the existing utilities operated by EPCOR, and the prioritization of those opportunities based on the highest potential return on investment (ROI)

In-Progress – Over 2021, a combination of internal working groups and an external consultant developed the high level strategies and a plan for the 6 specific initiatives that will support the development of the Utility of the Future. Two of those initiatives, 1) situational awareness and adaptability and 2) procurement, partnership and alliances were identified as high priority and are currently under development with dedicated resources assigned to each.

Initiative Year End Status

One Water – Continue the Alignment of the Integrated Resource Planning Activities Between Water and Drainage

Water and Wastewater utilities around the world are enhancing their strategic planning by moving to a "One Water" approach to managing the entire Water cycle in their community. The One Water approach has been defined as a holistic approach to sustainable water management that breaks down the traditional silos within the water utility sector and encourages collaboration between water utilities and other sectors.

In-progress – The One Water initiative started in 2020 with the formation of the One Water Planning group within EWSI with a mandate to consolidate planning across all of the water cycle. 2021 saw continued focus in a number of high priority areas including: 1) Consumption Patterns – an assessment of overall consumption patterns completed and presented to Utility Committee in early 2022. This work will be used to inform City Design and Constructions standards in consultation with the development community – planned for fall, 2022.

- 2) Situational Awareness development of situational awareness dashboard for both water and drainage operations was completed
- 3) SanIRP/ SSSF/ Future Wastewater Plants Expansions under development with the plan to complete the first consolidated report by the end of 2022
- 4) Growth Strategies for City and Region ongoing as EWSI coordinates with City planning groups as they implement the City Plan.

Submit and Defend the 2022-2026 Water PBR and the 2022-2024 Drainage and Wastewater Treatment PBRs

EPCOR is proposing to renew the Water PBR rates for another five year term for the period 2022-2026. To stagger the future renewal periods, EPCOR will file the Gold Bar and Drainage PBR applications for a three-year term 2022-2024.

Completed – The majority of the application development was completed in 2020, with final review completed in early 2021 prior to submission to the City of Edmonton. Three separate applications were developed, one each for water, wastewater and drainage along with business cases for the majority of the capital spending. Common appendices were included to address issues and requirements that cross all three utilities. Post submission activities focused on answering information requests from City Administration, City Council and external parties in order to provide additional clarity and background information where required. The approval process then culminated in a public meeting where the applications were reviewed and then ultimately approved by City Council on August 30.

5.2 Water Services

INITIATIVE	Year End Status		
Customer Service			
Improve Development Processes and Coordination with City of Edmonton and UDI/IDEA – Water Services will focus on better coordination with City Roadways, LRT, Development and Planning group for greenfield and infill development work as well as local industry associations (UDI, IDEA).	On-going – Initiatives to improve coordination with the City continued through 2021. Examples include Roadways, LRT planning and infill development. New requirements will evolve as both organization introduce new processes. EWSI worked with the City and IDEA to develop the Infill Cost Sharing Program which was successfully piloted in 2020. Based on that success, this program was proposed to be expanded and received approval as part of the 2022-2026 Water PBR application.		
Improve Operational Coordination with the Regional Water Customer Group (RWCG) – This initiative will improve communication, planning and coordination of operational activities and unplanned events to ensure an effective and coordinated response to planned or unplanned events.	On-going – Operational communication and planning with the RWCG members continued to improve over 2021, particularly around outages, repairs and other operational activities. This also includes sharing of information such as reservoir levels, pressure data and other important operational information. Additionally, EWSI attends all RWCG Steering Committee meetings to provide updates on major operational initiatives (e.g. Lead program) in addition to regular financial updates.		
Develop a Strategy for Additional Communication Around Water Breaks and Outages	In -progress – To further improve outage communication, Water D&T commenced the review the process for updating the outage map on epcor.com. The intent is to update the map to provide more real time information to customers. Water D&T and PGA will also evaluate additional means to notify customers of unplanned outages and updates. This work was delayed from the original schedule and will continue into 2022		
Public Health and the Environment			
Execute the Lead Mitigation Strategy in Edmonton and roll out to other communities – Water Services will develop a proactive means of reducing public health risks to customers from	In-progress – Design of the orthophosphate dosing systems at Rossdale and E.L. Smith has been completed and construction has commenced. The orthophosphate systems are on track to commence operations in early 2023		

INITIATIVE	Year End Status
lead and to ensure compliance with the new guidelines for lead in drinking water.	(AEP provided formal approval to add orthophosphate to the Edmonton water in early 2020 after receiving an environmental impact assessment from EPCOR). Broader communication plans and messaging related to the implementation of orthophosphate for customers will commence mid-2022. A long-term monitoring program will be developed to optimize and ensure the effectiveness of orthophosphate dosing across Edmonton. After initial delays due to the impact of COVID-19 in early 2020, the program for full LSL replacements (from "main to meter") started in mid-2020 for high priority LSLs and those LSLs associated with water main renewal projects. The program continued through 2021 with 144 high priority LSLs replaced (44% higher than planned). The overall object is to eliminate the high priority LSLs by end of 2024.
Complete kīsikāw pīsim Solar Farm and Smart Grid System – The kīsikāw pīsim Solar Farm is planned as a 13.6 MW solar farm that will provide renewable energy for water treatment plant operations. In conjunction with that project, EWSI has received federal grant funding to build a Smart Grid System including a 4 MW battery energy storage system and micro-grid controls.	On-going – This project received final approval in October 2020 after considerable public and stakeholder consultation. Construction commenced in 2021 with completion planned by year end 2022.
Execute Green Energy Purchase Agreement – In addition to the kīsikāw pīsim Solar Farm, another key component of Water Services' strategy to reduce its environmental footprint is to explore a competitive procurement for new renewable power from other Alberta sources for the remainder of the grid sourced electricity currently used by water operations.	On-going – In 2020, EPCOR Utilities Inc. signed an agreement with Renewable Energy Systems Canada ("RES") to develop and construct a new wind farm in southern Alberta. EPCOR will acquire the Renewable Electricity Certificates ("RECs") from the project for a 20 year term. The combination of this offtake agreement and the kīsikāw pīsim Solar Farm will result in EPCOR Water utilizing 100% green electricity for all its operations within the City of Edmonton. Permitting activities are currently underway and the wind farm is expected to be constructed in summer 2022 with commercial operations commencing in Q1 2023
Confirm to ISO 14001 Across All Water Services Sites – Environmental Management	Complete – all Water Service facilities in Edmonton operate under a common

INITIATIVE	Year End Status		
Systems (EMS) are required at facilities and treatment systems across Water Services. Those facilities/systems with an Environmental Management Systems built to meet the old standard are required to transition and conform to the new ISO 14001:2015.	Environmental Management system. Work in 2021 focused on developing plans for implementing ISO14001 at EPCOR's regional sites that were not registered and to begin the process of implementing management systems at these sites. Maintaining the same processes and management systems at regional sites facilitates staff transfers and backups in case of emergencies.		
Employee and Public Safety			
Conform to ISO 45001 Standards Across all Water Services Sites – Water Services has implemented and obtained registration to the OHSAS 18001 safety management system and is progressing to convert to the updated ISO 45001 safety management system to support continued safety performance improvement.	Completed – For its core Edmonton operations, Water Services has obtained registration in the updated ISO 45001 safety management system in order to support continued safety performance improvement. The transition to ISO 45001 for non Edmonton sites is progressing and will continue into 2022.		
Review Effectiveness of Safe Work Planning Across All Water Services Sites – Safe work planning includes implementing a field level hazard assessment that effectively identifies hazards and implements controls to prevent potential injury to employees, contractors and the public. Water Services will review safe work planning for all locations to strengthen hazard assessment and reinforce safety integration into routine and non-routine tasks.	On-going - EWSI continues to develop and implement company-wide assessments for six of the lifesaving rules and chemicals to effectively review existing procedures to ensure conformance to the EPCOR Standards and provincial legislative requirements		
Employee Development			
All initiatives are detailed in the Common sec	tion above		
Operational Performance			
Conduct an Energy Audit Across All Areas	In-Progress – a review of energy utilization across all areas of water has commenced with the goal of reducing overall energy use through increased efficiency. This program will support the achievement of EPCOR's environmental goals as defined in the ESG report published in 2021.		
Develop a Standardized Approach to Asset Management Across Water Services by Confirming to ISO 55000 – The Asset	On-going – The Asset Management Methods Office continued to develop with a focus on aligning the current Asset Management		

INITIATIVE **Year End Status** Management Framework will be expanded and Framework with ISO 55000 standards to allow adapted to allow greater consistency in how it is greater consistency in how it is applied across applied across business units of Water Services various Business Units of Water Services. The by aligning with the international standard for resulting asset management plans formed a asset management ISO 55000. central input into the development of the capital plans approved as part of the 2022-2024/26 PBR Applications. **Optimize Meter Reading Function Through** On-going - In 2021, Water Services completed

Introduction of AMI

Water Services will seek to optimize the meter reading function through an analysis of current routing as well as the implementation of meter reading technologies to determine if they are viable from a cost benefit perspective. Analysis of the costs and benefits of introducing Automated Meter Reading (AMR) and Advanced Metering Infrastructure (AMI) technology will be completed.

the analysis of the costs and benefits of introducing AMI technology and incorporated the results of that analysis into a business case as part of the submission for the 2022-2026 PBR. The proposed implementation of an AMI network in Edmonton would utilize the existing EDTI communications backbone in order to provide a more cost effective solution than a stand-alone installation. The project was approved as part of the overall PBR approval. Planning and design work commenced in in late 2021 and will continue with implementation over the next few years.

Develop and Implement a Bio-solids Strategy –

Since the 1970's, biosolids have been sent to the Clover Bar lagoons for additional processing and disposal, mostly through composting, landfilling and agricultural land application. Over time, the inventory of biosolids in the lagoons have increased as disposal has not met production, to where there is more than 6 years of inventory stored in the lagoons. Additionally, the City of Edmonton made a decision to close down composting operations, due to the integrity of the facility. An overall strategy is required to address these concerns.

In-progress – In late 2019, the development of a biosolids management program was initiated. The objectives of the program were to continue to finds ways to beneficially dispose of biosolids, in a financially and environmentally sustainable manner, while reducing the inventory of biosolids in the Clover Bar lagoons. Work on this strategy continued to include the development of the business case for the development of a dewatering facility which was included in the PBR application. The implementation requirements for the dewatering facility and the overarching strategy continued to be refined during 2021 and will continue into the future. This will include a review of bio-solids generation forecasts, regulatory and market changes, assessment of emerging technologies and the quantification of environmental benefits.

Growth and Financial Performance

All initiatives are detailed in the Common section above

5.3 Drainage Services

Initiatives and Objectives	Year End Status	
Customer Service		
Build Relationships with Stakeholders to Create Trust and Understanding – Drainage Services will continue to build stakeholder engagement plans that are aligned with the capital plans.	On-going – In 2021, Drainage Services continued to ensure that stakeholder engagement plans were developed for all major capital projects. This work included considering when and how to engage with stakeholders to ensure the largest impact. Stakeholder engagement has become an operationalized process and will be incorporated into new capital projects that commence over the coming years.	
Build Systems, Processes and Training to Provide Consistently Good Service Continue to evaluate sources of customer escalations and implement remedial actions; reduce the number of escalations and reduce customer service connection time.	On-going – through 2021, Drainage continued to focus on improving levels of customer services. Unfortunately, as indicated in the customer service metrics (section 4.5.2), the impact of COVID on crews and site working conditions impacted customer service in a number of areas. As noted in that section, adjustments were made in crew assignments and other areas to address the situations as they arose. These and other efforts are continuing in 2022 in order to ensure customer service performance is aligned with levels defined within the PBR metrics.	
Execute Corrosion and Odour Mitigation Strategy The Corrosion and Odour Reduction (CORe) Strategy was developed using similar principles and approaches to SIRP program in order to determine an optimized mix of operational and capital solutions to reduce corrosion and odour. The CORe Strategy expands the previous plan by focusing on preventing the formation of H ₂ S gas, which will reduce community odour impacts and lengthen the life of sewer network assets. The current strategy also differs from previous plans by segregating the City into regions with consistent odour issues, those with dynamic odour issues, and those with emerging odour issues. Different approaches are proposed for	In-progress – a review of the work completed in 2021 for the execution of the CORe program is contained in sections 4.3.1 of this report and a more detailed listing of planned projects and initiatives in the approved. the 2022-2024 Drainage PBR Application	

Initiatives and Objectives	Year End Status
each region to ensure that causes of the odour are fully understood and to ensure that capital projects will provide sustainable relief.	
Execute the Stormwater Integrated Resource Plan (SIRP) As part of the agreement to transfer Drainage Services to EPCOR, EPCOR committed to developing a complete stormwater strategy to reduce flooding risks within the City of Edmonton for urban and riverine flooding events. Drainage Services has created the Stormwater Integrated Resource Plan (SIRP) project to integrate environmental and social externalities; operational, planning and infrastructure responses; risk assessment and management; financial analysis; and an open participatory process that incorporates continuous improvement.	In-progress – a review of the work completed in 2021 for the execution of the SIRP program is contained in section 4.3.1 of this report and a more detailed listing of planned projects and initiatives in the approved the 2022-2024 Drainage PBR Application
Complete Drainage LRT Relocations - In 2018, Drainage Services received notifications from the City of Edmonton requesting Drainage Services to start sewer facility relocation for several LRT projects. The notifications indicated that the Valley Line West (VLW) and the Metro Line Northwest (NW) Phase 1 are the City's next two LRT priorities. Since receiving the City's notifications, Drainage Services has been diligently working on the LRT Drainage Relocation Projects. Drainage Services has undertaken corresponding investigations, planning and design works for the VLW LRT project.	In-progress – a review of the work completed in 2021 for the execution of the LRT Relocates program is contained in section 4.4.1 of this report and a more detailed listing of planned projects and initiatives in the approved the 2022-2024 Drainage PBR Application
Public Health and Environment	

Optimize Impact of Our Operations on the Environment

As an environmental steward in Edmonton,
Drainage Services will minimize our
environmental impact in all aspects of our
operations. Drainage Services has been
working with the City of Edmonton on the climate
change initiative through the work on the SIRP.
The purpose of this plan is to identify work that

On-going – Drainage Services continues to work towards ensuring that all environmental work is aligned with considerations arising from the SIRP, and Corrosion and Odour Mitigation (CORe) Strategies. The over-riding goal remains to reduce flow to the river.

Initiatives and Objectives	Year End Status
needs to be accomplished to reduce the impact of stormwater flow on Edmonton residents and businesses.	
Employee and Public Safety	
Reduce Tolerance towards safety related risks - Develop customized safe work plans for each unique work area. Implement a new Contractor Management Program, including a framework and guidelines for managing prime contractor accountabilities Cultivate a culture of Safety Leadership – Ensure that incidents are reported accurately within our Event Reporting System (ERS), investigations are completed in a timely manner, and learnings are shared with all employees.	 On-going - as noted above in the drainage metrics section, Drainage Services exceeded all metrics and a number by a significant margin. This performance was the culmination of a number of programs including: Safe work plans have been developed for each unique work area. Work is underway to integrate these into a Safe Work Plan App for use in the field. The Contractor Management Program, including guidelines for managing prime contractor accountabilities and serious incident response plans, were updated and communicated to managers as required. Initiatives intended to develop a strong safety culture continued including training for compliance and conformance, revision of process, near miss and other reporting metrics as well as programs to increase general awareness among staff. Training of people leaders to lead incident investigations began in 2019 and has continued since that time. This will form a common approach for incident investigation
Train Staff for Competency and Confidence This initiative includes creating and implementing Hazard Registries for all high risk work; establishing competency based assessments for high risk tasks; and implementing "EPCOR Athletes" – a program to learn about body mechanics and how to incorporate healthy movement into everyday tasks for both field works and office workers.	On-going - The EPCOR Learning and Development team began the development of the formal Competency Assessment Project in 2019. The roll out of the program commenced in 2020 and will continued for several years as additional modules are developed and implemented.
Employee Development	
Develop Great Leaders Who Embody EPCOR's Values	On-going - Drainage created functional area business plans that outline two year objectives

Initiatives and Objectives

In order to make sound business decisions, leaders must understand their accountabilities and their specific role in delivering the Water Services and the Drainage Services Operational Plans.

Year End Status

that align with the goals and strategies of this higher level Operational Plan. The intent is to create a deeper understanding of the business plan and alignment across all work units by directly involving leaders in the development of their section's business and responsibilities. In order to further support this understanding, a focus has been placed on ensuring that 100% of people leaders have a Position Description that outlines their role and accountabilities.

Operational Excellence

Develop and Optimize End-to-End Processes within Drainage

Drainage Services will be reviewing all processes to determine opportunities for efficiency and optimization. Process improvement projects may utilize project management, reporting, metrics and change management to monitor success and ensure sustainment. This program supports the identification, facilitation and realization of benefits of/from improvement opportunities across the Plan-Design-Build-Operate business cycle in Drainage.

In-progress – In 2021, the focus of process optimization has been concentrated on 17 separate initiatives identified in the water/drainage synergy project. The majority of these are opportunities are specifically related to the co-locating of Drainage Services' and Water's distribution and transmissions functions in the new Aurum facility (planned for 2023) Effectively, these opportunities are related to the synergies that would result from combining/co-locating groups that do similar functions in a common facility.

Identify and Manage Emerging Risks – This initiative identifies business risk and formulates appropriate mitigation strategies. Is also includes implementing knowledge transfer to mitigate the risk of losing technical expertise as well as addressing findings from internal audits to mitigate operational risks.

On-going – Drainage continues to identify and manage risk across a number of areas within the business. Operating procedures continue to be developed and updated to ensure system knowledge is captured and operational risks are mitigated. Internal audits are utilized to identify areas of risk, including the Construction Services Audit that was completed in 2021. Drainage also completed a risk based assessment of capital programs that were approved in the PBR application and is now utilizing the same methodology in developing and Sanitary IRP program.

Growth and Financial Performance

Correct the Revenue Leakage that is Occurring

In Progress – work continued through 2021 to address the issues identified in the original audit. A comprehensive analysis of City of

Initiatives and Objectives	Year End Status
In 2019, Drainage Services began an audit of the	Edmonton properties was completed. As part of
Stormwater Utility. Through the initial analysis,	the drainage transfer review conducted by
the stormwater team found multiple	Grant Thornton for the City, the
discrepancies in the billing system due to a	recommendation was made to include City
number of factors including lack of auditing since	properties in billing. This potential change will
system inception in 2003, lack of written	be further reviewed and included in Drainage's
standards, information system limitations and	2025-2029 PBR application.
billing system limitations.	

6 Stormwater Integrated Resource Plan Update

6.1 Introduction

The SIRP program, presented to the City of Edmonton Utility Committee and approved by City Council in 2019, is a \$1.6 billion system-wide integrated approach, which began in 2019 and expected to be completed over the next 20 to 30 years. The program will mitigate flood risk by reducing the health and safety, financial and social risks of flooding with lower overall capital investment than compared to traditional engineering approaches. This includes the incorporation of green infrastructure and operational programs that support building community resiliency and leveraging advanced technologies to better manage stormwater volumes during storm events. In addition, annual operating costs for SIRP include an average of \$2.2 million per year for operational activities plus the backwater valve subsidies which are forecast to increase over a 20 year period from approximately \$0.8 million per year to \$1.76 million per year. The SIRP program can be classified into five investment themes described below:

- SLOW: We slow the entry of stormwater into the drainage network by absorbing it in green infrastructure such as Low Impact Development (LID) features and holding it in ponds, creating space in the collection system during storm events;
- MOVE: We move excess water away from areas at risk, quickly and efficiently;
- SECURE: We help secure individual properties in higher risk areas against sewer backups, inflow infiltration (I/I) and overland flooding and river flooding;
- PREDICT: We predict and manage the movement of stormwater through smart sensors and technologies that integrate into the collection system; and
- RESPOND: We respond through fast rollout of flood barriers, traffic diversions, and public communications to protect life, safety and property.

The largest investment theme of the SIRP strategy is the "SLOW" theme with an estimated investment of \$470 million in dry ponds and \$480 million in LID over the 20-year SIRP plan. The SLOW theme involves slowing the entry of stormwater into the drainage network by absorbing it in green infrastructure and holding it in ponds, creating space in the collection system during storm events. Green infrastructure includes both dry ponds and LID. Dry ponds are designed to capture the large intensity rainfall events and hold the water within the neighbourhood until after the storm event has ended and then slowly release the water into the adjacent trunk networks. LID installations are designed to capture the lower intensity stormwater volumes that occur around the periphery of the large storm and have the ability to capture, absorb, slow and filter stormwater before it flows into the sewer system, groundwater or surface waters. LID installations also provide water quality enhancement for the primary storm events that do occur throughout the year helping EPCOR to meet the environmental regulations surrounding discharges to the rivers and creeks in Edmonton.

Due to the topography of the urban environment there exists numerous low or sag locations throughout the city of Edmonton. The SIRP strategy prioritizes investment in low-lying sag locations because there is potential for water to pool in these areas during major storm events. The objective is to redirect

stormwater to dry ponds and LID in order to reduce peak flows to the stormwater system via the MOVE investments. Under the SECURE theme, SIRP will rehabilitate the grey infrastructure in these sag locations to reduce inflow and infiltration and includes an enhanced building flood proofing program for the properties adjacent to these localized sag areas to further protect the property from damage. The SECURE theme also includes improvements to the existing outfalls and control gates to secure the pipe network and properties from river flooding during high water level events. The PREDICT theme includes adding monitoring and real time controls to transition the entire stormwater system (including both pipes and ponds) into a "smart" system. This will aid in improving response times to major storm events and will allow for real time management of flow volumes between adjacent stormwater retention locations. Finally, the RESPOND theme includes the development of emergency response stations located throughout the city. These stations will be outfitted with emergency response equipment such as portable flood barriers, pumps and hoses to allow for efficient deployment during a major flooding event.

In addition to the five themes, EPCOR continues to actively engage with the Federal government and Insurance industry including participation in the development of the National Adaptation Strategy as a member of the Disaster and Resiliency table. EPCOR also has presented the SIRP strategy at numerous industry organizations supporting the municipal and insurance sectors. In 2021, the SIRP strategy and the project team were recognized with Clean50 awards as leaders in Canada in approaches to flood mitigation. The Intact Center for Climate Adaptation also released their updated report ranking Cities across Canada on their flood mitigation efforts and in particular highlighted that the approach being taken in Edmonton can be considered a model approach for other communities to emulate. EPCOR is also working with the EMRB Stormwater collaborative on a project to extend the SIRP framework to the Edmonton Region. This initiative will be begin later in 2022.

6.2 Major Accomplishments

SIRP Theme Description

SLOW - SIRP Dry Ponds Program

EWSI identified 31 locations across the city where dry ponds should be considered to support flood mitigation in a community. The final siting, sizing and design will be part of a coordinated discussion between EWSI and the City and working closely with local communities.

EWSI developed the dry pond schedule over the next 20 years assuming that typically there will be 6 active pond projects per year (2 in planning, 2 in design and 2 in construction). This timing aligns with the recently approved

Α

2021 Accomplishments

All 31 proposed new dry ponds have been reviewed through the City of Edmonton Open Spaces Repurposing Phase 1 review procedure and initial assessments were completed to confirm that all can proceed to Phase 2 reviews. The Phase 2 reviews will occur as the individual locations move into the concept design phase and include additional consultation with the City and local community on pond configuration and considerations for amenities and construction impacts.

In 2021, construction was substantially completed for the Malcolm Tweddle, Parkallen and Tawa dry ponds. Construction was initiated for the Steinhaurer dry pond. Concept design was completed for the Kennilworth dry pond and detail design was initiated.

R water Services Inc.	PBR 2017-20.
SIRP Theme Description	A 2021 Accomplishments
Federal Government Disaster Mitigation and Adaptation Fund (DMAF) grant of \$44 million supporting construction of 13 dry ponds over the next 10 years.	Lauderdale and Parkdale ponds are currently in the concept design phase and the Ottewell dry concept design will be initiated later in 2022.
SLOW - SIRP LID Program SIRP includes wide scale implementation of LID throughout the entire city to reduce the peak stormwater flows that are entering the storm pipe network and pooling at low areas on the city streets. LID has the ability to support the capture, detention and retention of large stormwater events. In 2020, EWSI added the Greened Hectare as a new PBR performance metric and target to measure its performance in implementing LID. An increase in LID through the City of Edmonton will also result in improved performance on the total loadings to the river and the combined sewer overflow reduction strategies.	LID Design standards were developed and approved through consultation with the City of Edmonton and the development community and added to the Design and Construction standards available for use by developers for both greenfield and infill development. The standards clarified both the below ground components and the vegetation requirements to reduce the cost of detailed design for the development community. The project team continues to evaluate additional types of LID to increase the variation in form factor of LID to support different urban form constraints. Of particular note is the development of a proposed green sidewalk design to allow for the use of the space below the sidewalks and a portion of the grassed area adjacent on the private side of the property to capture stormwater prior to reaching the street.
	In 2020 and 2021, LID was installed in 23 project locations, (with each location having one or multiple LIDs associated with it); and two small storage proje locations for a total number of added Greened Hectares over the 2 years of 36. In 2022, it is expected that 45 GHa will be added across the City 20-21 project locations including the 103 Avenue location immediately to the west of City Hall currentl under construction.
	The LID construction to date has focused on sites managed by EPCOR and coordinated with City of Edmonton planned construction sites. This initial approach was to facilitate the development of the design standards to support broader implementation For 2022 and beyond the focus is on increasing the LID on private customer sites with projects currently underway with the University of Alberta, Lafarge and

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the Shamrock curling club. Design has also been

CIDD Thomas Decembring	A 2024 Assemblishments
SIRP Theme Description	completed for a box planter design suitable for connection to residential, low rise multi family and small scale commercial downspouts to slow roof drainage flows.
	EPCOR will also be working with City Operations in 2022 to assess the potential cost and environmental benefits for small underground parking lot storage to be dual purposed for capture of snow melt during extreme storm events necessitating residential snow clearing.
MOVE - SIRP MOVE Program The move theme involves moving excess water away from areas at risk, quickly and efficiently through both stormwater tunnels, trunks, sewer separation and movement of water through overland drainage paths. The	With the COVID-19 restrictions limiting the ability to move forward with activities related to in home property specific enhanced flood proofing, the focus shifted to developing strategies to reduce the historical on-going flooding risks related to ditches and swales. Working closely with the City of Edmonton, EWSI
SIRP proposed investment in MOVE infrastructure is estimated at \$300 million over 20 years. For the 2022 to 2024 PBR term, the infrastructure investments identified in the SIRP-MOVE theme are primarily aligned with the SIRP-SLOW initiatives and confirmation of overland flow paths in locations without a piped stormwater system.	identified historical surface flooding locations associated with ditches and swale flooding. Through this review a number of locations requiring regrading and culvert upgrades were identified, a number of these locations were upgraded in Mistatim and North east Edmonton leveraging Federal government stimulus funding obtained by IIS. The work in Mistatim reduced the typical annual complaints of overland flooding down to 2 from a historical 50 per year.
	A ditches and swales maintenance manual was developed with City Operations and new equipment requirements and maintenance schedules required fo vegetation management in ditches was developed. A formal process was also developed to manage and track any new ditches and swales flooding concerns, as historically these were only addressed each season.
	EWSI completed a detailed review of the partially separated sewer areas to identify quick win reconfigurations to reduce stormwater entry into the combined system if there was an adjacent storm pipe and identify locations where catch basins connected to sanitary pipes lead to increased flooding risk in

SIRP Theme Description	A 2021 Accomplishments
SIRE THEME DESCRIPTION	neighbourhoods.
	The Kinnard storm trunk and storm trunks on 105ave in the downtown core were under construction in 2021 and continue into 2022. The storm trunk supporting the Kennilworth dry pond will begin construction in 2022.
SECURE - Outfall and Control Gates Program The SIRP strategy includes a \$30 million investment in outfalls and control gates to be added to existing outfalls	A standard outfall gate design has been selected with one alternative configuration developed. Typical designs for both retrofitting a gate within an existing manhole and/or installing a new gate in a new manhole are being developed.
located within the river valley to provide additional protection to the residential homes located within these areas from river water backing up through the pipe	The methodology for confirmation of outfall suitability to have a gate added has been developed and approximately 30% of the outfalls have been assessed for outfall gate configuration.
network. EWSI is planning to install the proposed automatic controls and new outfalls over 12 years due to the higher damage risk exposure for river valley neighbourhoods. Some outfall control gates will be partially funded by Federal DMAF grant programs.	Construction to retrofit the outfalls with existing manual gates will occur in late 2022 for the Cloverdale neighbourhood. New installations for outfalls without existing gates will begin in 2023 and continue over the next ten years in alignment with the DMAF grant funding for this work.
DIVIAF GIAIIL PIOGIAITIS.	A DMAF2 grant application was also submitted in late 2021 for additional three outfall gates to protect the Gold Bar Wastewater treatment plant from high river flood events. The Federal government has not yet announced the successful communities who will receive DMAF2 funding.
SECURE - I&I reduction The SIRP strategy includes a \$100 million investment in I&I reductions. I&I occurs when inflow flood waters enter	The topographical sag locations across the City of Edmonton were reviewed and all manholes and pipes requiring relining were identified and prioritized completion in the coming years.
the piped network either through openings in manhole lids or through	More than 1000 manholes have been relined in 2020 and 2021.
cracks in the manhole frames and in the pipe network when the soils are fully saturated. Minor leaks on these pipes can induce a high volume of infiltration into the pipe network when the soils are fully saturated with water. SIRP	Detailed I&I monitoring, smoke testing and modelling analysis was completed for the northwest areas contributing excess storm flows into the NEST sanitary trunk system. Detailed community outreach plans are in development for the neighbourhoods showing higher levels of infiltration after a major storm

SIRP Theme Description

includes implementation of increased maintenance and repair on drainage infrastructure that is at higher risk of exposure to flooding in numerous sag locations along the road network.

A 2021 Accomplishments

event. Direct inflow connections due to storm pipes connected to sanitary pipes were confirmed as not a contributing factor to the flooding risks in these locations.

Additional analysis was completed on the sanitary system Inflow/infiltration levels within the Windermere, Riverview and Edgemont neighbourhoods are significantly lower than the current design standards, providing the opportunity to reassess the requirements for SSSF funded sanitary trunks in Southwest Edmonton. Once reviews are completed recommendations for SSSF trunks in these neighbourhoods will come to City Council Executive committee for approval of any changes to the SSSF plans.

SECURE - Enhanced Flood Proofing Program

EWSI's analysis of the localized sag areas with higher flooding risk has identified that there are approximately 6,000 properties (including 2,500 in the river valley neighbourhoods) that have a higher flooding risk due to being adjacent to areas where the water in the road could pool at depths above the 1 meter depth during an extreme storm event. There are an additional 40,000 properties with a mid-high exposure risk where ponding in the road network could be between 0.35 and 1 meter depth during these extreme events.

Under SIRP, \$60 million will be invested over 20 years for the Enhanced Building and Flood Proofing Program to support correction of lot grading on publicowned portion of the parcel and repairs to public-owned portion of drainage service lines in conjunction with the property owner implementing these improvements on the privately-owned

EPCOR provided a detailed project update on the SIRP SECURE activities in the August 2021 Utility committee meeting.

Since the approval of the SIRP strategy additional resources have been hired to support property owners through the flood inspection and backwater subsidy programs. The inspectors also completed the certified flood inspectors training program developed by the Intact Center on Climate Adaption and the standard report delivered after an inspection has been updated to match the certified program components for a full inspection.

EPCOR also completed a public opinion survey of the backwater subsidy program, detailed results were also shared in the August 2021 report to Utility committee. In general there is a positive perception of the program with recommendations to improve the process and timelines for submission for the subsidy.

EPCOR has also implemented an online booking tool to support customers in arranging for a flood inspection and have seen increased uptake in customers applying for an inspection as a result.

In 2021, EPCOR also worked with Edmonton Public School Board and City of Edmonton Facilities group to provide detailed flood risk information for their

SIRP Theme Description

portion of the service line.

EWSI will also continue to invest in the Backwater Valve Subsidy Program with a subsidy amount of \$800 per property for backwater valve installation for eligible properties. This program has been supported by the utility since 2004 and is consistent with programs offered in other communities across Canada.

PREDICT

EWSI will predict and manage the movement of stormwater through implementation of smart sensors into the collection system and a dashboard system to increase situational awareness of real time storm tracking and ability to respond to major storm events. EWSI estimates total investment in \$70 million in monitoring and controls under SIRP over 20 years.

The capital plan for SIRP includes the installation of permanent underpass warning systems at 20 locations identified as being at higher risk of flooding with depths where there is a higher risk to public safety.

2021 Accomplishments

properties to support their internal capital programs.

Additional flood risk awareness building was initiated in the Rossdale neighbourhood in alignment with the water treatment plant flood protection public consultation processes. Additional outreach to all property owners (commercial, institutional and residential) is planned as a priority over the next few years, aligned with City of Edmonton Climate Change adaptation and Resiliency efforts.

The SIRP Dashboard project was implemented in 2021, bringing together a number of disparate monitoring systems used with the Drainage and Water business units. The dashboard provides access to real time sensor data and is integrated with EPCOR GIS systems and is available to all employees to view via the EPCOR intranet.

A grant application was submitted to the Federal Government DMAF2 initiative in late 2021. The grant included proposals to convert the existing wet ponds throughout the City into a Smart pond system to allow for real time management of Stormwater pond water levels during a rainfall event.

Underpass warning systems were implemented in conjunction with the City of Edmonton at Whitemud Drive/Gateway Boulevard, Whitemud Drive/106 & 111 Streets, and 63 Avenue/Gateway Boulevard. The remaining underpass locations for warning systems were confirmed and design is progressing for installation each year. The team has also been working with IIS to have these incorporated as any new underpasses are constructed.

A detailed analysis of the geyser location at 30th avenue and Calgary trail was completed and the probable root cause of the geyser has been determined to allow for the implementation of mitigation measures through introduction of flow controls on the storm basin to the north and additional ventilation manholes on the storm basin to the east.

Updated IDF curve analysis was completed based on an additional 5 years of rain gauge data in the

	A
SIRP Theme Description	2021 Accomplishments
	Edmonton region. Consultation with the City and UDI to update the design standards based on this new information will occur in 2021. This information was also shared with EMRB Stormwater collaborative for use in the region.
RESPOND	
The respond theme will enable EWSI to	In 2021, EPCOR purchased two mobile flood

The respond theme will enable EWSI to effectively respond to flood events through fast rollout of flood barriers, traffic diversions, and public communications to protect life, safety and property. The SIRP strategy includes a \$45 million investment over 10 years to modernize emergency response equipment to ensure effective response to flooding events at emergency response locations within the river valley and at other high risk locations.

The SIRP RESPOND approach broadens the role of the traditional stormwater utility from one that focuses primarily on the management of the pipe moving stormwater, to one where the utility is an active participant in the response to the flooding event and proactively develops emergency response protocols in advance of the flooding events to support the Office of Emergency Management who leads the response efforts.

In 2021, EPCOR purchased two mobile flood response trailers equipped with Tiger Dam flood barriers and associated equipment to provide flood protection of critical Drainage infrastructure located within the River Valley. Due to the temporary and portable nature, these barriers can be deployed at multiple locations as required. EPCOR also purchased a sandbagging attachment for skid steer equipment, which allows for filling and deployment of sandbags on location when needed.

In 2022 additional coordination is planned with City resources in the Office of Emergency Management, City Operations and the Climate Adaptation team to refresh the emergency response protocols for river valley flooding and identify locations and types of flood barriers suited for the different reaches of the river valley.

EPCOR completed a flood risk assessment review of all 1300 City owned properties and provided this information back to the City Risk Management and Asset management teams to allow them to assess mitigation measures for these locations. Additional coordination will occur in 2021 to provide our expertise in mitigating these risks going forward.

Similar analysis was completed for Water Services and EPCOR Electricity Distribution and Transmission (EDTI). Water Services was able to secure grant funding to implement flood protection measures at their facilities and purchased additional equipment to protect high risk electrical equipment. EDTI has also incorporated flood mitigation measures into their future capital planning.

Analysis was currently completed for the Edmonton Public School Boards to inform their emergency

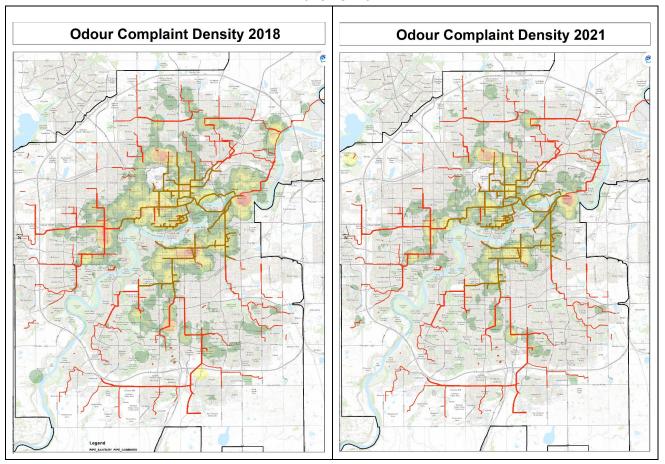
	A
SIRP Theme Description	2021 Accomplishments
	response protocols and to allow for identification of opportunities to align the SIRP-SLOW and SIRP SECURE initiatives not only for property protection but to also identify opportunities to incorporate these initiatives into the curriculum at each school.

7 Corrosion and Odour Reduction Strategy Update

7.1 INTRODUCTION

Over the past decade, residents of Edmonton have reported over 10,000 instances of odours related to the sanitary and combined sewer network. To develop a robust strategy to address odour issues, EWSI has conducted public consultation, engaged with community members across the city, conducted advanced sewer air monitoring campaigns and expanded its sewer asset inspections. The assessment determined that odours are a precursor to the more serious corrosion and premature failure of sewer assets and this correlation was further confirmed over the last few years from a number of significant sewer trunk failures in locations with previous odour complaints. Figure 7.1 below is a heat map of odour locations across Edmonton comparing 2018 prior to the start of the CORe program and 2021.

Figure 7.1
Edmonton Odour Locations
2018 vs. 2021



EWSI implemented the Corrosion and Odour Reduction (CORe) Strategy that focuses on preventing the formation of hydrogen sulphide (H₂S) gas, which will reduce community odour impacts and lengthen the life of sewer network assets. The CORe Strategy includes roughly \$200 million capital investment and \$18 million in operating expenditures to address early action items over the period of 2019 to 2026. Implementation of CORe began in 2019.

EWSI's CORe Strategy includes the capital and operational program investments to focus on preventing the formation of H₂S gas by keeping the wastewater moving, adding chemical treatment, and expanding inspections and cleaning. Construction and rehabilitation of tunnels impacted by sewer gas corrosion is included in the capital program. Also included is the addition of improved access points for both inspection and cleaning purposes. Pump station enhancements through operational configuration changes including addition of chemical treatment to the system are also included to reduce wastewater stagnation time at the station.

Another focus for CORe is to enhance system understanding using real-time monitoring technologies and improved inspection data to better inform future capital and operational programs. Sewer trunks are 20 to 40 meters underground and some of these trunks constructed under previous City design standards do not have sufficient access points for inspection and cleaning. Approximately 80 km of trunk lines are currently beyond the reach of inspection technologies and do not allow inspections to identify whether

H₂S is forming and causing corrosion and odour issues, or whether the line contains sags or deposits of sediment/fat that require cleaning and may cause odour or operational issues in the future.

The CORe Strategy also recognizes that sewer gases will be venting out of the system as part of the normal process of moving wastewater through the system. Although it may be impractical to stop such venting in the system, venting locations can be controlled to reduce community impacts. Odour venting is managed by reducing air pressure in the sewer pipes, adding containment structures, and providing controlled release points.

EWSI's investments in CORe can be classified into four themes: PREVENT, OPTIMIZE, MONITOR and CONTROL. Details on the recent accomplishments within each of the themes is provided further below.

7.2 CORe MAJOR ACCOMPLISHMENTS 2021

CORe Theme Description

PREVENT – CORe Large Trunk Rehabilitation Program

The CORe Large Trunk Rehabilitation Program focuses on the rehabilitation of large trunk sewers greater than or equal to 1,200 mm in diameter. EWSI has forecasted total program capital expenditures for this program during 2022-2024 PBR term at \$79.0 million. This program includes two large discrete projects: the Mill Creek Combined Trunk Reach 49 and the 99 Avenue and 151 Street Trunk Sewer Rehabilitation Project at an estimated cost of \$28 million and \$30 million respectively during the 2022-2024 PBR term.

The other large trunk rehabilitation projects within this program will address trunk repairs required with an imminent risk of failure and by prioritizing the projects based on risks. As EWSI continues to install access manholes as another component of the CORe strategy (through the CORe Access Manholes Program), it expects to identify additional trunk locations

2021 Accomplishments

Under CORe Large Trunk Rehabilitation Program, EPCOR Drainage seven large trunk rehabilitation projects were worked on in 2021:

 151 St / 99 Avenue Sanitary Trunk Rehabilitation.

Stage 1 involves the construction of approximately 1,636 m of new 1800 mm in diameter bypass tunnel. 965m bypass tunnel was constructed in 2021. Stage 2 of the project is to rehabilitate the existing trunk. At the end of the project, both trunks will be put into service providing additional trunk capacity along this priority growth corridor.

 Mill Creek Combined Trunk Reach 49 Replacement

Consists of new combined trunk along 97
Street from 80 Avenue to 88 Avenue to replace the heavily corroded Trunk 49 located west of Mill Creek within the creek alignment. Odours will be reduced within the creek through the elimination of the drop structure and multiple manholes adjacent to the creek along this trunk. This reconfiguration will also increase the trunk line capacity available in Reach 41 immediately to the east of the creek to provide additional sewer capacity for the Bonnie Doon growth node east of Mill Creek. The detailed

CORe Theme Description	2021 Accomplishments
requiring immediate rehabilitation work	design of the project was completed in 2021.
at critical locations.	Combined Trunk Area C-2 – Reach 94
	The preliminary design was completed in 2021 for rehabilitation of this large combined trunk located immediately to the west of Commonwealth Stadium.
	o 151 South Large Trunk Rehabilitation
	The trunk inspection was completed in 2021 to determine rehabilitation scope requirements. Concept design began in 2022.
	 Large Trunk Sewer NEST - NL2 Trunk Rehabilitation
	Due to high sewer odours in this portion of the NEST system due to previous operational practices, this trunk requires structural rehabilitation within the next few years. In 2021, an access manhole was installed to facilitate inspection to confirm extent of liner required. Construction of the liner is planned for 2022/2023
	NEST NL1 Sanitary Chamber Rehabilitation
	The project scope was evaluated and confirmed based on inspection results in 2021. Rehabilitation is being coordinated with the NL2 work mentioned above.
	 116 Street - SAN 11 Double Barrel Rehabilitation
	The design of 3 access manholes was completed and the construction of the access manholes began in 2021.
PREVENT - CORe Duggan Tunnel Project	The Duggan tunnel replacement project is continuing to progress as per the CORe strategy.
The \$86 million CORe Duggan Tunnel Project is essential for addressing sewer corrosion and odour issues in the Steinhauer-Duggan area. The Steinhauer-Duggan sewer corridor is	Detailed design is complete with the design consultant completing the final components to issue the work for construction.

CORe Theme Description

an area that suffers from chronic, intense sewer odours and rapid asset corrosion. The area has accounted for one out of every ten sewer odour complaints received in the city of Edmonton over the past 20 years.

The CORe Duggan Tunnel Project includes the construction of a new, shallower sewer trunk converting this portion of the sanitary network to a fully gravity system eliminating the need to operate the existing Duggan Pump Station.

2021 Accomplishments

The Contractor for the project was selected via a competitive bid process in early 2022 with the construction kick off meeting held in June 2022.

Risk workshops to finalize the construction plan will occur in the coming months and construction is expected to commence in Q4 of 2022.

EPCOR is also evaluating the potential to repurpose the old tunnel as an offline storm water storage tunnel to be used during major storms and reduce the ultimate size requirement for the Duggan dry pond proposed under the SIRP program. Final decision will be made after the new Duggan Sanitary tunnel is completed and the old tunnel can be fully inspected without sanitary sewage flowing to confirm the feasibility of this reconfiguration. If structurally feasible the use as a storm tunnel will avoid the write down of this asset for the utility.

PREVENT - CORe Access Manholes Program and Trunkline Cleaning Program

The CORe Access Manhole Program is a critical component of the CORe Strategy under the PREVENT theme.

The CORe Access Manhole Program is an annual program that initiates projects to construct access manholes in major trunk lines. There are approximately 170 km of sanitary and combined large trunk sewers (1,200 mm diameter and large) constructed over the past 100 years to varying standards and specifications.

Approximately 80 km of the large trunk lines in the city of Edmonton have

Total number of access manholes installed since the start of the CORe program is 11.

5.3 km of sanitary and combined trunkline were inspected in 2021 using Multiple Senor Inspection (MSI) method or Closed-Circuit Television (CCTV) inspection method. Based on the inspection findings, 2.5 km of trunkline have been identified with excessive debris and these trunklines were cleaned in 2021. The trunkline inspection also revealed that 90m of the inspected trunkline has severe surface corrosion and over 3km has moderate surface corrosion

Also 2021, 83 existing trunkline access manholes were inspected to confirm accessibility for future trunkline inspections and provide a quick overview scan for the city wide sanitary and combined trunk system since the majority of failures discovered were in near vicinity to drop structures and major changes in flow. This was to identify any trunklines with severe deterioration in the vicinity of the access location and to improve prioritization for

CORe Theme Description

2021 Accomplishments

insufficient access provisions for safe inspection and cleaning purposes.

The scope of this program for the 2022-2024 PBR term is to construct a total of 24 additional access locations on major trunk lines. The forecast total program capital expenditures during 2022-2024 is estimated at \$17.9 million.

future access manhole construction and cleaning efforts.

Action plans including rehabilitation and operational activities have been developed to address these identified corrosion and defects based on the priority impact of failure of the trunk line segments.

To improve the efficiency of the trunkline inspection and cleaning work, Master Service Agreements have been established for external trunk inspection and cleaning work in 2021.

OPTIMIZE

The purpose for the OPTIMIZE theme is to reduce the stagnation time of sanitary sewage in the network and reduce the opportunity for H2S generation.

Operationally there are opportunities to improve pump station and storage area operations to reduce storage times and inspection and cleaning can be employed to target blockages and sediment. By removing impediments to flow and keeping wastewater moving, sewer odours can be significantly reduced. During the 2022-2024 PBR term, the total capital expenditures for pump station improvements is estimated to be \$2.7 million.

Three locations were the focus for optimization of pumping in 2021

o Duggan/Allendale Corridor

Upgrades to PW 105 were completed to allow for reduction in duration for storage of sanitary sewage flows in the Duggan tunnel during dry weather flow conditions. Reductions in H2S concentrations were noted in the immediate vicinity of the station and in the downstream network multiple blocks away.

NEST\Clareview trunk System

The NEST\Clareview trunk system was a primary focus in 2021 due to the conditions noted on the NL2 trunk. This included the addition of access manholes, cleaning of the trunks and optimization of the pumping at PW188 and reconfiguration of the trunk operation with the removal of the weir installed in the vicinity of PW174. H2S concentrations have reduced by 80% in the vicinity of the trunk to a point where they are below the concern threshold for H2S to cause significant future corrosion.

• Big Lake Pump stations\Trunk system

The Big Lake area, due to its location and neighbourhood configuration is serviced by three sanitary sewer lift stations and contains

CORe Theme Description	2021 Accomplishments
	longer than typical lengths of sewer forcemain which contribute to the risk of increased odours. The chemical feed systems for these pump stations was optimized to determine chemical dosing patterns along with pump set points to manage stagnant flow in the forcemains. This resulted in a reduction of overall odours by 30 to 50% from this system in the immediate vicinity and downstream in northwest Edmonton.
MONITOR The MONITOR theme is to improve EWSI's understanding on the H2S	CORe has greatly expanded the internal monitoring capacity to support H2S mitigation and management planning. A total of 80 H2S sewer air,
EWSI's understanding on the H2S generation mechanism within the sewer system by using real-time monitoring technologies and improved inspection	20 H2S ambient air, 12 H2S liquid and 60 air pressure monitors are now active or available in inventory and are being deployed with the support of additional paragraph. In the manifering team
data. This theme is also coordinated with the SIRP PREDICT theme and	of additional personnel in the monitoring team. As of 2021, CORe monitoring has been completed
involves using real-time monitoring technologies to improve wastewater	at more than 300 sites across the city. Common sites include pump station wet wells, force main
management. Permanent odour monitoring locations will be installed to connect to the Drainage SCADA system. The total expenditure on EWSI's CORe Monitor Project will be \$0.3 million in the 2022-2024 PBR term.	discharges, large drop structures and both small and large sewer trunks. The data provides hydrogen sulfide concentrations, pressure, humidity and air temperature values for the
	monitoring sites. This data has been used to develop and prioritize interventions, improve existing mitigation efforts and measure the overall success of the CORe program as a whole.
	In addition to the monitors moving in and out of different locations continuous long-term monitoring coverage across the city to track trends in odour and corrosion risk has also been installed. A total of 10 in-sewer locations and 10 above ground ambient locations have been in place continuously since 2020. Five permanent stations are presently being installed in 2022. An additional 15 are planned for 2023-2024
	All monitoring data has been made accessible to the entire business unit through integration with the SIRP dashboard platforms

CONTROL

EPCOR Water Services Inc. PBR 2017-2021

CORe Theme Description

The purpose for the CONTROL theme is to control the release of air from the sewer system by reducing air pressure in the sewers, adding containment structures, and providing controlled release points in areas with lower community impact.

The major capital component for this theme is to retrofit existing drop manholes with proper ventilation system structures that reduce the downstream air pressurization of a sewer and reduce the potential for sewer gases to exit the system at catchbasins and manholes

Other containment work will include the installation of flaps, ventilation units, and sealing manholes. EWSI is forecasting capital expenditures under this theme to be \$24 million during the 2022-2024 PBR term in the CORe Drop Structure Modification Program (\$22 million) and in other containment projects (\$2 million).

2021 Accomplishments

To date, eight drop structure modification projects have been completed in the Allendale / Strathcona communities with another five presently under design or in construction across the city.

More than 30 one way flaps and 10 manholes seals have been installed to date under CORe. The installations have proven to be very effective at reducing odour nuisance.

The team also completed a detailed review of the five existing odour control systems installed on the sewer trunks. This included a review of performance and maintenance challenges at each location. Based on the review, two of the locations are no longer functional as designed and alternative approaches to odour mitigation are being implemented.

PBR 2017-2021 EPCOR Water Services Inc.

Appendix A: PBR Plan 2017-2021

A.1 In-City Water and Wastewater

A.1.1 PBR Framework

EWSI's In-City Water and Wastewater rates for the 2017-2021 PBR term are regulated by Edmonton City Council in accordance with the PBR Plan approved in Bylaw 17698. This plan encompasses rates, performance measures, and return on equity. The relationships between these components are designed to ensure that capital and operating cost decisions provide a balance between operational performance, rates, and return on equity, while safeguarding system reliability and service quality, providing fair, stable, predictable rates to rate payers, and providing a basis for the future development of the water and wastewater treatments system.

- **PBR Rates.** Annual changes to In-City Water and Wastewater rates are limited to inflation, less an efficiency factor, plus Special Rate Adjustments and, in rare cases, Non-Routine Adjustments. The use of a formulaic approach for calculating and setting utility rates acts as a "price cap" providing ratepayers with stable and predictable rates. The efficiency factor, set at 0.25% for the 2017-2021 PBR term, requires EWSI to increase productivity and achieve efficiencies in excess of inflation if it is to meet it targeted return on equity.
- Performance Measures. EWSI's PBR framework includes performance measures for water and wastewater treatment system service quality as described in Schedule 3, Sections 3 and 4 of the Bylaw. EWSI faces financial penalties if it does not meet or exceed performance measure standards, providing assurance to customers that water and wastewater treatment system service quality will not be sacrificed to keep rates low or increase returns to EWSI. EWSI's performance measures are audited annually by an independent accounting firm.
- Return on Equity. The PBR plan incorporates a forecast rate of return on equity commensurate with consumption, cost and other risks that allows EWSI to finance its operational and capital programs, to provide its customers with high levels of service quality and reliability, and to provide "just and reasonable" returns to its shareholder. Achieving this return is dependent on EWSI achieving operating cost efficiencies, meeting or exceeding performance standards, and developing the utility infrastructure needed to provide service to its customers. For the 2017-2021 PBR term, returns on equity are based on a deemed capital structure of 60% debt and 40% equity and a 10.175% rate of return on equity.

A.1.2 Risks and Incentives

The PBR framework provides incentives for EWSI to improve operational performance while achieving cost savings through process improvements and other means. Under this framework, EWSI also assumes the risks associated with water consumption, operating costs, financing costs and capital costs, ensuring that customers are provided with stable and predictable rate increases. These risks and EWSI's strategies to mitigate them include:

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EPCOR Water Services Inc. PBR 2017-2021

 Water Consumption Risk. Under PBR, EWSI bears all of the risks associated with weather-related fluctuations in water consumption and water quality, as well as the longer-term risks associated with declining consumption per customer. EWSI seeks to mitigate consumption risk through the use of robust forecasting methodologies incorporating long term trends in water consumption.

- Operating Cost Risk. EWSI actively works to minimize fluctuations in input prices through long-term power contracts, chemical optimization processes, and continuous efforts to implement cost reduction strategies in all areas of its operations.
- Interest Risk. Fluctuations in short-term interest rates, long-term debt issue costs and in the level of
 capitalized interest have significant impacts on EWSI's net income and return on equity. EWSI
 mitigates interest risk through timing of long-term debt issuances and optimizing working capital.
- Capital Cost Risk. In-City Water and Wastewater's operations are capital intensive and it is often
 difficult to forecast required levels of capital replacements, both at the plants and in the water
 distribution and transmission network. EWSI seeks to minimize these risks through comprehensive
 capital project and asset management programs, ensuring that new projects or changes to existing
 projects are justified and that there is an appropriate level of management, senior management and
 executive oversight over capital spending.

A.1.3 Customer Classes and Rate Structure

A.1.3.1 In-City Water

In-City Water rates consist of fixed monthly service charges that vary with meter size and variable charges applied to each cubic metre of water consumed. Consumption charges differ for each of In-City Water's customer classes. These classes and their rate structures include:

- Residential Customer Class. Residential customers are charged based on an inclining rate structure with three consumption blocks. The inclining rate structure is intended to promote water conservation and provide incentives for residential customers to use water efficiently.
- Multi-Residential Customer Class. Multi-residential customers are charged based on a declining
 rate structure with three consumption blocks. EWSI has found that the cost of providing water to
 individual multi-residential customers declines as the size of the multi-residential building increases.
 As well, there is a wide range of consumption volumes for multi-residential customers. Accordingly,
 a declining rate structure best reflects the cost characteristics of this customer class.
- Commercial Customer Class. Similar to multi-residential customers, commercial customers are charged based on a declining rate structure, but with five consumption blocks to recognize the wide range of average consumption volumes within this customer class.

The 2017-2021 PBR Plan includes three Special Rate Adjustments for In-City Water:

 Special Rate Adjustment for Rebasing. The In-City Water revenue requirement was rebased at the beginning of the 2017-2021 PBR term. The resulting rebasing adjustment to rates includes the on-

PBR 2017-2021 EPCOR Water Services Inc.

going benefits to rate-payers of efficiency gains realized in the 2012-2016 PBR term, the impacts of higher than forecast capital expenditures during the 2012-2016 PBR term; and increases in the capital expenditure programs for the 2017-2021 PBR term. Also included in the rebasing adjustments is the impact of EWSI's cost of service study which has resulted in redistribution of revenue requirements from the Residential and Multi-Residential customer classes to the Commercial customer class.

- Special Rate Adjustment for Accelerated Programs. These Special Rate Adjustments support the
 acceleration of the replacement of water mains as part of the City of Edmonton's neighbourhood
 renewal program and the upgrade of water mains to increase fire protection capacity in
 neighbourhoods experiencing increased densities as a result of infill development.
- Special Rate Adjustments for Environmental Programs. EWSI is undertaking two significant environmental initiatives during the 2017-2021 PBR term. The first initiative is an extensive River Monitoring Project to regularly monitor, evaluate and report on a number of water quality variables from several sampling sites in the river for 2018-2021. This program is forecast to have annual costs of \$1.0 million starting in 2018. The second initiative, which aligns with the City's "The Way We Green" strategy, is a Green Power Initiative to replace approximately 10% of EWSI's total power volumes with energy from locally produced renewable sources starting in 2018. This initiative is forecast to cost \$1.9 million annually commencing in 2018.

A.1.3.2 Wastewater Treatment

Wastewater treatment rates consist of fixed monthly service charges that are applied equally to each customer and variable charges applied to each cubic meter of water consumed. Wastewater has two customer classes:

- Residential Customer Class. Unlike In-City Water, there are no separate rates for multi-residential
 customers. Instead, customers who would be multi-residential water customers are subject to the
 same rates as residential wastewater customers. The common rate structure for residential and multiresidential customers recognizes that the costs of wastewater treatment are very similar for
 residential and multi-residential customers. Accordingly, charges to Residential customers are based
 on a flat rate structure with a single consumption block.
- Commercial Customer Class. Consumption charges for commercial customers are based on a
 declining rate structure with three consumption blocks to recognize that there are economies of scale
 in wastewater treatment for larger commercial customers. In addition, commercial customers are
 charged overstrength fees for prescribed materials that exceed the concentrations shown in Section
 4 of Schedule 1 to Bylaw 17698.

The 2017-2021 PBR Plan includes a single special rate adjustment for rebasing. Similar to In-City Water, Wastewater's revenue requirement was rebased at the beginning of the 2017-2021 PBR term to reflect efficiency gains realized in the 2012-2016 PBR term, as well as the substantial increases in capital spending needed to deal with the challenges of the aging infrastructure at the Gold Bar Wastewater Treatment Plant.

EPCOR Water Services Inc. PBR 2017-2021

A.2 Drainage

A.2.1 PBR Framework

EWSI's Drainage rates for the 2018-2022 PBR term are regulated by Edmonton City Council in accordance with the PBR Plan approved in the EPCOR Drainage Services Bylaw 18100. Similar to In-City Water and Wastewater, Drainage's 2018-2022 PBR plan encompasses rates and performance measures, but the mechanisms used to achieve a balance between rates and operational performance differ in important respects, as follows:

- PBR Rates. Bylaw 18100 prescribes drainage fees and charges for the period from January 1, 2018 to March 31, 2022. These fees and charges reflect EWSI's commitment to limit average annual rate increases to 3%. Besides these scheduled rate increases, Bylaw 18100 also includes a mechanism for non-routine adjustments to rates related to emergent City-directed needs.
- Performance Measures. Bylaw 18100 requires Drainage to measure operational performance for the period from January 1, 2018 to December 31, 2019 using performance measures for drainage system service quality modeled after previous City Drainage Services quality metrics. After that time, for the remainder of the 2018-2021 PBR term, Drainage's operational performance will be measured against new performance measures that will be developed Drainage and approved by the Utility Committee. Similar to Water and Wastewater, the new performance measures have a scoring system with financial penalties applied if Drainage does not meet or exceed performance standards. As with Water and Wastewater Treatment, the performance measures scorecard will be audited annually by an independent accounting firm.

A.2.2 Customer Classes and Rate Structure

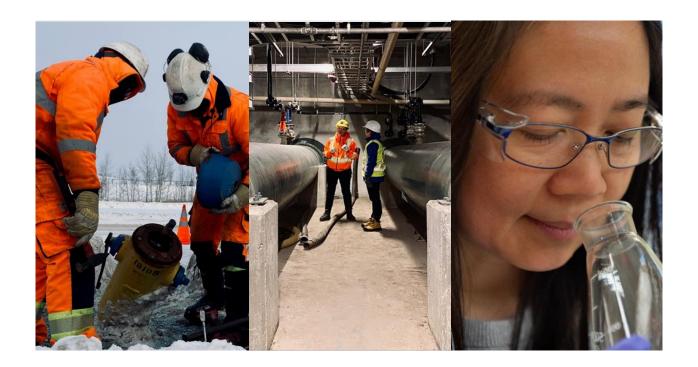
Drainage has Residential, Multi-Residential and Commercial Customer classes, using the same customer definitions as Water. Drainage's rate revenues are derived from both Sanitary Utility and Stormwater Utility services.

- Drainage has a simple rate structure, with flat monthly service charges varying only by meter size
 regardless of customer class and the same monthly variable rate per cubic meter applicable to all
 customers, regardless of customer class, except the University of Alberta which has a unique rate,
 intended to recognize its lower servicing cost.
- Stormwater Utility revenues are based on the area of the customer's property, development intensity, and zoning, also with common rates regardless of customer class.

Attachment 1

Performance Based Regulation 2022 Progress Report

2022-2024 Drainage and Wastewater Treatment Services 2022-2026 Water Services





EPCOR Water Services Inc.

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1 Executive Summary

This report provides the annual update to the City of Edmonton on the operational and financial results for the year ended December 31, 2022 for water and fire protection services ("In-City Water"), wastewater treatment services ("Wastewater"), and sanitary and stormwater utility services ("Drainage Services") provided within Edmonton by EPCOR Water Services Inc. ("EWSI"). Throughout this report, reference will be made to "EPCOR Water Services" and "EPCOR Drainage Services" as these were the EPCOR business units that existed in 2022. Since July 3, 2023, EPCOR Water Services and Drainage Services have been amalgamated into a single business unit, that will be responsible for the ongoing commitments for the PBR plans referenced in this report. Edmonton City Council regulates In-City Water in accordance with the 2022-2026 Performance Based Regulation ("PBR") Plans approved in EPCOR Water Services Bylaw No. 19626 ("Bylaw 19626") and Drainage and Wastewater Treatment services in accordance with the 2022-2024 PBR Plan approved in EPCOR Drainage Services Bylaw No. 19627 ("Bylaw 19627"). The key features of these plans, which encompass rates, performance measures, and return on equity are described in Appendix A.

1.1 Financial Performance

In-City Water, Wastewater and Drainage Services' financial performance¹ for 2022 are summarized in Table 1.1-1 below:

Table 1.1-1
Revenue and Return on Equity
(\$ millions)

		Α	В
		202	22
		PBR	
		Forecast	Actual
1	In-City Water		
2	Regulated revenue	220.1	223.1
3	Return on equity	42.0	43.0
4	Rate of return on equity	7.90%	8.36%
5	Wastewater		
6	Regulated revenue	122.1	124.2
7	Return on equity	21.7	25.1
8	Rate of return on equity	9.94%	12.44%

¹ Consistent with the 2022-2024/2026 PBR Applications, all financial data in this report, including totals and sub-totals, are rounded to the nearest \$0.1 million to ensure continuity of data between tables and between years. However, the sum of the rounded financial data in certain tables may not be equal to the related rounded total or sub-total.

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		А	В
		2022	
		PBR	
		Forecast	Actual
9	Drainage Services		
10	Regulated revenue	236.4	238.6
11	Return on equity	43.8	41.8
12	Rate of return on equity	6.31%	6.18%

Table 1.1-1 shows that 2022 actual financial performance, as measured by return on equity for In-City Water and Drainage Services was close to target, while 2022 financial performance for Wastewater Treatment exceeded the PBR forecast. Higher than forecast revenues were attributable to higher than forecast customer growth and higher than forecast consumption prior to the introduction of the consumption deferral on April 1, 2022. Actual to forecast differences in return on equity in 2022 for each utility are as follows:

- In-City Water achieved an 8.36% rate of return on equity, slightly higher than the forecast
 rate of return of 7.90%, largely due to higher than forecast revenue resulting from higher
 customer growth and higher water consumption prior to the introduction of the
 consumption deferral.
- Wastewater achieved a 12.44% rate of return on equity, compared to the forecast rate
 of return of 9.94%, reflecting higher than forecast revenue, lower than forecast operating
 expenses and a lower than forecast rate base due to lower capital additions over the 2017
 to 2021 period resulting from project deferrals and other adjustments to the capital
 program.
- Drainage Services achieved a 6.18% rate of return on equity, slightly lower than its PBR forecast rate of return of 6.31%, with higher than forecast operating expenses, partially offset by higher than forecast revenue as well as lower than forecast depreciation and rate base. Operating expenses were higher primarily due to higher than anticipated costs for trunk cleaning and inspections due to the amount of solids found within the trunk network and longer than anticipated use of leased facilities due to the delayed move to the new shared facility, resulting in higher costs than forecast. Revenue was higher due to higher customer growth.

Detailed analyses of In-City Water, Wastewater and Drainage Services' financial performance for 2022 are provided in Sections 2.1, 2.2, and 2.3, respectively, of this report.

1.2 Capital Expenditures

In-City Water, Wastewater and Drainage Services' capital expenditures for 2022 and for the PBR Term (the "2022-2026 Water PBR term" and "2022-2024 Wastewater and Drainage PBR term") are summarized in Table 1.2-1 below:

Attachment 1 2022 PBR Progress Report

Table 1.2-1
Capital Expenditures
(\$ millions)

	Α	В	С	D
	202	22	2022-2	024/2026
	PBR		PBR	Current
Capital Expenditures	Forecast	Actual	Forecast	Projection
In-City Water	91.5	126.2	429.3	550.8
Wastewater	52.1	45.7	171.7	177.0
Drainage Services	226.7	239.1	754.3	776.8

Over the course of the PBR term, changes to capital programs are required to address unforeseen needs for repairs or rehabilitation, changes in regulatory or operational requirements, customer demands, and other external factors. These changes are coordinated through EWSI's Capital Governance and Review group and are authorized by EWSI's Capital Project Steering Committee, EPCOR Utility Inc.'s (EUI) Financial Review Council, or EPCOR's Board of Directors, depending on the amount of the expenditure. EWSI also presents information on its capital programs, as well as business cases supporting significant new capital projects (i.e., not already included in the approved PBR application), to the City of Edmonton's Utility Committee.

- In-City Water's 2022-2026 projected capital expenditures of \$550.8 million are \$121.4 million (28%) greater than the PBR forecast. Significant projects contributing to this variance include projects that were delayed and carried over from the 2017-2021 PBR term, including the kīsikāw pīsim Solar Farm and Battery Storage System, Phosphoric Injection for Lead Control, and the Water/Drainage Real Estate Consolidation Project (\$46.3 million); a higher than anticipated volume of utility infrastructure relocate requests from the City of Edmonton related to the LRT expansion, Yellowhead Trail upgrades, and water distribution main relocates (\$40.0 million); and an increase in developer-driven growth projects such as the Network Private Development Transmission Mains Program and Water Services Connections Program (\$36.6 million).
- Wastewater's 2022-2024 projected capital expenditures of \$177 million are \$5.3 million (3%) slightly greater than the PBR forecast. This difference reflects considerable efforts to rebalance Wastewater's capital program in response to changing priorities to ensure that Wastewater continues to provide a high level of service to its customers while mitigating risks and maintaining performance standards.
- Drainage Services' 2022-2024 projected capital expenditures of \$776.8 million are \$22.5 million (3%) slightly greater than the PBR forecast. This difference reflects various shifts between programs as Drainage Services continues to refine and reprioritize its overall capital expenditures program to address asset condition, mitigate the risk of failure, and maintain required service levels, while staying as close as possible to the approved capital envelope.

Attachment 1 2022 PBR Progress Report

Detailed explanations for differences between capital expenditures in PBR forecast and EWSI's current projections are provided in Sections 2.1.5, 2.2.5 and 2.3.5.

1.3 Operational Performance

In-City Water's operational performance is measured by the results of indices prescribed in Schedule 3, Section 3 of Bylaw 19626 with each index consisting of one or more performance measures. Wastewater treatment and Drainage Services' operational performance is measured by the results of indices prescribed in Schedule 3, Section 3 and Section 4 of Bylaw 19627.

Operational performance under each index is measured independently on a points basis with 100 base points available if the standards for all performance measure indices are achieved. Bonus points are available for performance above standards and financial penalties are applied if EWSI does not meet the 100 base point standard.

In 2022, In-City Water exceeded the performance standards for all five of its performance measure indices, Wastewater treatment exceeded the performance standards for three of its four performance measure indices, and Drainage Services exceeded the performance standards for all four of its performance measure indices. Actual operational performance for each of the indices are summarized in Table 1.3-1 and discussed in Section 3 of this report.

Table 1.3-1 2022 Performance Measures and Standards

		Α	В	С	D	Е	F
		In-City	Water	Waste	water	Drainage	Services
Performance Index			Actual		Actual		Actual
		Standard	Score	Standard	Score	Standard	Score
1	Water Quality Index ²	30.00	30.00	45.00	49.50	-	-
2	Customer Service Index	15.00	17.25	15.00	16.50	20.00	22.00
3	System Reliability and Optimization Index	25.00	28.25	25.00	24.70	30.00	31.60
4	Environmental Index ²	15.00	17.25	-	-	35.00	38.50
5	Safety Index	15.00	17.25	15.00	15.20	15.00	16.50
6	Aggregate Points Earned	100.00	110.00	100.00	105.90	100.00	108.60

1.4 Rates and Bill Comparisons

In 2022, the average residential customer's monthly bill for In-City Water services, based on an average monthly consumption of 14.0 m³, was **\$41.90**, an increase of \$2.75 (7.0%) from 2021. This increase is largely due to the addition of a fixed monthly charge for public fire

² Water Quality and Environmental are combined into one index for Wastewater's and Drainage's operational performance

Attachment 1 2022 PBR Progress Report

protection services of \$2.54 (6.5%). Prior to 2022, the cost of public fire protection was recovered by the City of Edmonton through property taxes.

The average residential customer's monthly wastewater treatment and sanitary drainage services bill in 2022, also based on an average monthly consumption of 14.0 m³, was \$51.63, an increase of \$5.05 (10.9%) from 2021. This increase includes a special rate adjustment of \$2.94 related to the corrosion/odour mitigation program approved as a separate initiative by City Council. The remainder of the increase reflects other capital and operating revenue requirement changes approved in the PBR applications.

The average residential customer's monthly stormwater drainage services bill in 2022, was **\$14.94**, an increase of \$1.19 (8.6%) from 2021. The 2022 bill includes a special rate adjustment of \$2.29 for climate-related flood mitigation program costs approved by City Council following extensive engagement and consultation with stakeholders and reflects other capital and operating revenue requirement changes approved in the PBR applications.

EWSI's residential water bills are competitive with most cities and municipalities included in the comparison. Drainage and Wastewater treatment bills are more difficult to compare because of variations in the nature and extent of wastewater treatment, the inclusion of certain services in property taxes, and geographic and climatic factors that influence the level of investment and approach to flood mitigation. EWSI has been proactive in addressing the increased risk of flooding related to climate change and is making substantial investments through its Stormwater Integrated Resource Plan program to assess and mitigate these risks. EWSI's average wastewater treatment and drainage bills are comparable to cities that have started addressing risks related to climate change.

1.5 Consumption Deferral Account

For the 2022-2024/2026 PBR terms, City Council directed that EWSI establish "a deferral account for water consumption for each of Water Services, Wastewater Treatment and Drainage Services that would be accumulated during the 2022-2026 and 2022-2024 PBR terms and included in customer rates in each of the next PBR terms through a special rate adjustment". The effect of the consumption deferral on 2022 Water Services, Wastewater Treatment and Drainages Services is summarized in Table 1.5-1 below. This table shows that actual consumption from the beginning of the 2022-2026 PBR term starting April 1, 2022 to December 31, 2022, was greater than forecast due to higher than forecast customer growth, a hot and dry summer resulting in increased consumption per customer, and commercial consumption recovering to pre-pandemic levels more rapidly than anticipated in the PBR forecast. The cumulative effect of these factors results in EWSI accumulating \$19.7 million during 2022 in the consumption deferral account which will be refunded to customers in the next PBR term as outlined and approved in the PBR Bylaws.

Attachment 1 2022 PBR Progress Report

Table 1.5-1 In-City Water Consumption Deferral

		Α	В	С	D
		Consump	tion (ML)	Consumpti	on Deferral
		Forecast	Actual	ML	\$M
1	In-City Water	64,547	69,673	5,127	8.1
2	Wastewater Treatment	62,323	67,289	4,966	5.5
3	Drainage Services	62,319	67,277	4,958	6.1
4	Total Deferral				19.7

1.6 Non-Routine Adjustments

Non-routine adjustments are defined in Bylaw 19626 for In-City Water Services and in Bylaw 19627 for Stormwater Utility Services, Sanitary Utility Services and Wastewater Treatment Services, as items that are "by their nature unusual, significant in size or nature and beyond the scope of control of EWSI". Bylaws 19626 and 19627 allow EWSI to request positive or negative non-routine adjustments to rates from either the City Manager or City Council, depending on the revenue requirement threshold specified in the respective Bylaws.

All non-routine adjustments applied for by EWSI during the 2022-2024 / 2022-2026 PBR terms are to be charged to the Adjustment Deferral Accounts. A two-step approach is then followed whereby EWSI would receive interim approval and funding for the proposed adjustment with a final true up of funding being completed based on actual costs.

During 2022, EWSI did not seek approval for any non-routine adjustments that met the criteria outlined in Schedule 3, Section 5.0 of Bylaws 19626 and 19627. EWSI may request approval in the future for expenditures that meet the non-routine adjustment criteria.

EPCOR Water Services Inc.

2 Financial Performance

2.1 In-City Water & Fire Protection

The City of Edmonton regulates water services and fire protection services provided by EWSI within the boundaries of the City of Edmonton ("In-City Water"). In addition to these services, EWSI provides water services to regional water customers pursuant to bulk water supply agreements with each regional water customer. Due to the fully integrated nature of EWSI's water system, operating expenses, capital expenditures, depreciation and amortization and rate base are presented and analyzed on a total system basis in Sections 2.1.3 to 2.1.10. In-City Water's share of the total system costs are calculated in accordance with a cost of service model developed jointly by EWSI, the Regional Water Customers Group (RWCG) and the City of Edmonton, shown as separate line items in each applicable table.

In-City Water's 2022 regulated revenues and revenue requirements are summarized in Table 2.1-1 below:

Table 2.1-1
In-City Water
Revenue and Revenue Requirements
(\$ millions)

		Α	В
		20	22
		PBR	
	Description	Forecast	Actual
1	Regulated revenue	220.1	223.1
2	Revenue requirement		
3	Operations and maintenance expenses	112.2	112.8
4	Less: revenue offsets	(6.3)	(4.2)
5	Depreciation and amortization	38.9	37.6
6	Return on rate base financed by debt	33.2	33.9
7	Return on rate base financed by equity	42.0	43.0
8	Revenue requirement	220.1	223.1
9	Return on rate base financed by equity*	7.90%	8.36%

In the PBR forecast, the special rate adjustment for rebasing is smoothed over the PBR term to mitigate "rate shock" at the beginning of the PBR term. Therefore, although EWSI's PBR forecast for the 2022-2026 PBR term is based on its awarded rate of return on 9.64%, PBR forecast rates of return for individual years of the PBR will differ from awarded ROE.

In 2022, EWSI achieved a rate of return on equity of 8.36%, slightly greater than its forecast rate of return of 7.90%. The factors contributing to forecast to actual differences are explained in Sections 2.1.1 to 2.1.9.

2.1.1 Customers and Consumption

In-City Water provides services to three customer classes:

- 1) **Residential**, 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;
- Multi-Residential, defined as a service supplied to premises used primarily for domestic purposes; where more than four separate dwelling units are metered by a single water meter; and
- Commercial, defined as a commercial, industrial and institutional customers within the City of Edmonton and all water customers not otherwise defined as Residential or Multi-Residential water service customers.

These classes are unchanged from the previous PBR term. Average monthly customer counts, total annual consumption and monthly consumption per customer are shown in Table 2.1.1-1 below:

Table 2.1.1-1 In-City Water Customers, Consumption and Consumption per Customer

	А	В
	20	22
Customers and Consumption	PBR	
	Forecast	Actual
1 Customers (average active services per month)		
2 Residential	278,978	282,685
3 Multi-Residential	3,789	3,800
4 Commercial	19,920	20,151
5 Total Customers	302,687	306,636
6 Annual Consumption (ML)		
7 Residential	44,870	47,400
8 Multi-Residential	17,658	18,695
9 Commercial	21,541	24,581
10 Total Annual Consumption	84,069	90,623
11 Consumption per Customer (m³ per month)		
12 Residential	13.4	14.0
13 Multi-Residential	388.4	410.0
14 Commercial	90.1	101.7

The factors contributing to the differences between actual and forecast for 2022 are explained below:

Customer growth, while higher than forecast, is consistent with historic growth rates.
 EWSI's PBR forecast was prepared during mid-2020 and anticipated a reduction in migration into Edmonton due to the COVID-19 pandemic, resulting in lower anticipated customer growth. In reality, 2021 and 2022 residential customer growth rates remained

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at or near pre-pandemic levels, resulting in higher than expected customer counts at the beginning of the current PBR term.

Consumption

- Residential 2,530 ML (5.6%) greater than forecast, with 596 ML due to higher customer growth and 1,934 ML due to higher per customer consumption. Higher per customer consumption reflected both weather-related variation due to unusually hot and dry weather, as well as the on-going COVID-19 impacts of more people working at home;
- Multi-Residential 1,037 ML (5.9%) greater than forecast, with 53 ML due to customer growth and 983 ML due to higher per customer consumption. In addition to weather-related variation, EWSI added several very large multi-residential customers in 2022. Because of the small number of customers in this class and the variation in the number of units per customer, the addition of large customers can have outsized effects on consumption per customer; and
- Commercial 3,040 ML (14.1%) greater than forecast, with 220 ML due to higher than forecast customer growth and 2,820 ML due to higher consumption per customer. Similar to the residential customer class, weather-related variation contributed to the increase in commercial consumption per customer.

2.1.2 Revenue

In-City Water rates consist of fixed monthly service charges that vary with meter size and variable charges per cubic meter of water consumed. For the 2022-2026 PBR term, City Council directed EWSI to make the following two significant adjustments:

- 1. Include "recovery of the public fire protection revenue requirement through water rates over the 2022-2026 PBR term by adding a special rate adjustment for public fire protection services to In-City Water's fixed monthly charges". Similar to water fixed monthly service charges, fire protection charges vary by meter size, but also by customer class, because of different fire flow requirements for each customer class. In prior years, the fire protection revenue requirement was recovered through property taxes; and
- 2. Establish "a deferral account for water consumption for each of Water Services, Wastewater Treatment and Drainage Services that would be accumulated during the 2022-2026 and 2022-2024 PBR terms and included in customer rates in each of the next PBR terms through a special rate adjustment".

The effect of the consumption deferral on 2022 In-City water is summarized in Table 2.1.2-1 below. This table shows that actual consumption from the beginning of the 2022-2026 PBR

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term starting April 1, 2022 to December 31, 2022 was 5,127 ML greater than forecast, resulting in a deferral of \$8.1 million that will be refunded to customers in the next PBR term.

Table 2.1.2-1 In-City Water Consumption Deferral

		Α	В	С	D
		Consump	Consumption (ML)		on Deferral
		PBR			
		Forecast	Actual	ML	\$M
1	Residential	34,391	36,336	1,944	3.9
2	Multi-Residential	13,351	14,254	903	1.3
3	Commercial	16,805	19,084	2,279	3.0
4	Total Consumption	64,547	69,673	5,127	8.1

Table 2.1.2-2 below provides a comparison of 2022 In-City Water revenues to the PBR forecast.

Table 2.1.2-2 In-City Water Revenue (\$ millions)

	· · · · · · · · · · · · · · · · · · ·	1	
		A	В
		202	22
		PBR	
	Description	Forecast	Actual
1	In-City Water		
2	Fixed monthly service charges		
3	Residential	38.3	38.8
4	Multi-residential	2.4	2.4
5	Commercial	6.9	7.1
6	Fixed monthly service charges	47.5	48.3
7	Consumption charges billed to customers		
8	Residential	98.4	103.5
9	Multi-residential	29.5	30.8
10	Commercial	29.3	33.1
11	Consumption charges billed to customers	157.2	167.5
12	Less: Consumption deferral		
13	Residential	-	(3.9)
14	Multi-residential	-	(1.3)
15	Commercial	-	(3.0)
16	Consumption deferral		(8.1)
17	Consumption charges, net of deferral		, ,
18	Residential	98.4	99.6
19	Multi-residential	29.5	29.6
20	Commercial	29.3	30.2
21	Consumption charges, net of deferral	157.2	159.3
22	In-City Water revenue	204.7	207.7

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		Α	В
			22
	Description	PBR	Actual
00		Forecast	Actual
23	Fire Protection		
24	Public fire protection	12.6	12.8
25	Private fire protection	2.8	2.6
26	Fire Protection revenue	15.4	15.4
27	Regulated Revenue	220.1	223.1
28	Other revenue ("revenue offsets")	6.3	4.6
29	In-City Revenue	226.3	227.7

Actual In-City revenue for 2022 was within 0.7% of the PBR forecast. This difference was attributable to the following factors:

- Fixed monthly service charges \$0.8 million greater than forecast due to higher customer counts.
- **Consumption charges** \$2.1 million greater than forecast, due to higher than forecast consumption per customer during the first three months of 2022, prior to the introduction of the consumption deferral, and higher than forecast customer growth.
- Fire protection charges Prior to the 2022-2026 PBR term, public fire protection charges were not billed directly to EWSI's customers. Instead, the cost of providing public fire protection, including dedicated reservoir capacity, oversizing of distribution mains to provide required fire flows and providing and maintaining fire hydrants, were charged directly to Edmonton Fire Rescue Services pursuant to a fire protection contract and were recovered through property taxes. As directed by City Council, effective April 1, 2022, EWSI charges customers directly for the costs of fire protection services. These charges vary by meter size and by customer class.
- Other revenues \$1.7 million lower than forecast. Other revenue ("revenue offsets") are derived from temporary services, connection fees, water permits, late payment charges and other incidental services, as well as a regulatory adjustment of \$1.0 million per year related to an over-collection of charges for valve casings and service box replacements during the 2017-2021 PBR term. The regulatory adjustment refunds this over-collection to customers through an increase in forecast other revenue, reducing the forecast revenue requirement and, therefore, rates over the 2022-2026 PBR term. The remainder of the variance relates to numerous small items, none of which were significant.

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2.1.3 Operating Expenses by Function

Table 2.1.3-1 below provides a comparison of EWSI's total water system operating expenses for 2022 to the PBR forecast.

Table 2.1.3-1
EWSI Total System
Operating Expenses by Function
(\$ millions)

		А	В
		20	22
		PBR	
	Function	Forecast	Actual
1	Power, Other Utilities and Chemicals		
2	Power and Other Utilities	10.5	12.4
3	Chemicals	12.5	8.5
4	Power, Other Utilities and Chemicals	23.0	20.9
5	Water Operations		
6	Water Treatment Plants	24.0	21.5
7	Water Distribution and Transmission	22.9	22.7
8	Operational Support Services	12.7	12.3
9	Less: Capitalized Overhead Costs	(9.1)	(7.1)
10	Water Operations	50.5	49.4
11	Billing, Meters and Customer Service	11.6	10.5
12	EWSI Shared Services	14.4	17.6
13	Corporate Shared Services	13.6	13.7
14	Franchise Fees and Property Taxes	17.6	18.4
15	Total Operating Expenses	130.7	130.5
16	In-City Share - %	85.9%	86.4%
17	In-City Share of Operating Expenses	112.2	112.8

Overall, total operating expenses for 2022 were \$0.2 million lower than forecast. Explanations for significant variances include:

- Power and Other Utilities \$1.9 million greater than forecast due to higher water consumption per customer due to higher seasonal temperatures and higher customer growth, resulting in higher than forecast power consumption to treat and distribute water. In addition, delayed energization of the kīsikāw pīsim solar farm because of delayed regulatory approval resulted in higher net purchase of power than forecast for 2022.
- Chemicals \$4.0 million lower than forecast, with favourable water quality providing \$3.1 million of savings due to lower usage of alum, carbon and caustic soda, and delays in implementing the phosphoric injection for lead mitigation project due to COVID-19, which resulted in a \$0.9 million reduction in phosphoric acid purchases.
- Water Treatment Plants \$2.5 million lower than forecast primarily due to lower salary and benefits costs of \$1.0 million due to vacancies and \$1.1 million lower contractor costs

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related to snow removal, lower general maintenance for the kīsikāw pīsim solar farm due to delayed energization and lower contractor spend on various miscellaneous activities.

- Billing, Meters, and Customer Service \$1.1 million lower than forecast primarily due
 to lower costs related to the move to the new Water/Drainage Shared Facility (Aurum
 facility).
- **EWSI Shared Services** \$3.2 million greater than forecast primarily due to higher salary and labour costs.
- Franchise Fees and Property Taxes \$0.8 million greater than forecast due to higher than forecast billed revenue. Franchise fees are calculated as 8% of eligible revenues less the municipal portion of property taxes. As noted in Section 2.1.2 above, water revenues were higher than forecast resulting in higher franchise fees paid to the City of Edmonton in 2022.
- In 2022, In-City Water's share of operating expenses were \$112.8 million (86.4%), compared to \$112.2 million (85.9%) in the PBR forecast. System wide costs are allocated between In-City customers and the RWCG using a cost of service model which was jointly developed by EWSI, RWCG and the City of Edmonton. The slight increase (0.5%) in In-City Water's share of operating expenses were primarily due to higher salary costs incurred by shared services groups providing support to the business unit because of wage inflation.

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2.1.4 Operating Expenses by Cost Category

Table 2.1.4-1 below provides a breakdown of operating expenses by cost category for rows 10, 11 and 12 from Table 2.1.3-1.

Table 2.1.4-1
EWSI Total System
Operating Expenses by Cost Category
(\$ millions)

	Α	В
	20	22
	PBR	
Cost Category	Forecast	Actual
1 Water Operations		
2 Staff costs and employee benefits	32.6	32.8
3 Contractors and consultants	8.6	8.0
4 Materials and supplies	3.7	3.8
5 Vehicles	0.4	0.9
6 Other	5.2	3.8
7 Water Operations	50.5	49.4
8 Billing, Meters and Customer Service		
9 Customer billing and collection services	8.2	8.8
10 Staff costs and employee benefits	6.4	5.4
11 Contractors and consultants	1.2	0.1
12 Vehicles	0.3	0.1
13 Other	1.2	0.8
14 Meter reading services (Recoveries)	(5.7)	(4.7)
15 Billing, Meters and Customer Service	11.6	10.5
16 EWSI Shared Services		
17 EWSI shared services allocation	10.5	12.5
18 Staff costs and employee benefits	3.6	4.9
19 Contractors and consultants	0.2	0.3
20 Other	0.2	(0.0)
21 EWSI Shared Services	14.4	17.6

2.1.5 Capital Expenditures by Major Project and Category

Table 2.1.5-1 compares PBR forecast to actual capital expenditures for 2022 by major category and by individual projects/programs in excess of \$5.0 million. Table 2.1.5-1 also provides a comparison of the total 2022-2026 PBR forecast capital expenditures to EWSI's current forecast for the PBR term. Detailed variance explanations are provided below.

Table 2.1.5-1
EWSI Total System
Capital Expenditures
(\$ millions)

		Α	В	С	D	Е	F]
		C	urrent Ye	ear		2022-2026		
		PBR			PBR			
	Major Category and Project	Forecast	Actual	Variance	Forecast	Projection	Variance	<u>Note</u>
1	Health, Safety and Environment							
2	kīsikāw pīsim Solar Farm and Battery Energy Storage System	1.0	16.8	(15.8)	1.0	20.4	(19.4)	1
3	Rossdale Ammonia Upgrades - Conversion to LAS	-	0.1	(0.1)	-	7.2	(7.2)	2
4	Projects < \$5 million	2.4	1.3	1.1	10.4	7.3	3.1	
5	Subtotal	3.4	18.2	(14.8)	11.4	34.9	(23.5)	
6	Regulatory							
7	Water Services Replacement and Refurbishment Program	5.8	5.9	(0.1)	24.7	25.0	(0.3)	
8	Phosphoric Injection for Lead Control	-	9.7	(9.7)	-	10.8	(10.8)	3
9	Projects < \$5 million	ı	-	-	0.8	-	0.8	
10	Subtotal	5.8	15.6	(9.8)	25.5	35.8	(10.3)	
11	Growth/Customer Requirements							
12	Water Service Connections Program	5.4	6.6	(1.2)	28.4	40.9	(12.5)	4
13	Network Private Development Transmission Mains Program	4.6	23.6	(19.0)	15.0	39.9	(24.9)	5
14	QEII / 41 Avenue Crossing Project	-	-	-	14.1	13.4	0.7	
15	New Meter Purchases and Installations Program	2.6	1.9	0.8	13.9	13.5	0.3	
16	Customer Distribution Main Infrastructure Requests	2.1	3.2	(1.1)	11.2	12.2	(1.0)	
17	LRT Relocates Program	5.0	5.5	(0.5)	10.3	19.4	(9.2)	6
18	Private Development Construction Coordination Program	1.8	2.7	(0.9)	9.7	14.5	(4.7)	7
19	Winterburn Booster Station Project	0.6	-	0.6	7.2	-	7.2	8
20	Franchise Agreement Distribution Main Relocations	1.1	6.6	(5.4)	6.0	18.0	(12.0)	9
21	Yellowhead Trail Upgrades / Relocations Project	1.5	5.4	(3.9)	5.0	23.8	(18.8)	10
22	Projects < \$5 million	1.5	0.8	0.7	4.2	5.0	(0.8)	
23	Subtotal	26.4	56.2	(29.8)	125.1	200.6	(75.6)	

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		Α	В	С	D	Е	F	
			urrent Ye	ear		2022-2026		
		PBR			PBR			
	Major Category and Project	Forecast	Actual	Variance	Forecast	Projection	Variance	<u>Note</u>
24	Reliability and Life Cycle Improvements							
25	Risk Based Distribution Main Renewals	5.5	3.4	2.1	29.0	19.2	9.7	11
26	Water Treatment Plants Flood Protection Project	5.9	3.5	2.3	22.9	55.5	(32.7)	12
27	Infill Fire Protection Program	3.9	1.2	2.8	20.2	15.5	4.7	13
28	EL Smith Stage 1 Filter Upgrades Project	3.5	3.0	0.5	13.5	16.1	(2.5)	14
29	Obsolete Valve Replacements Program	2.1	2.2	(0.1)	11.2	11.6	(0.4)	
30	Transmission Mains and Appurtenances	2.0	1.2	0.8	10.7	10.7	(0.0)	
31	Reservoir Structural Rehabilitation and Roof Replacement	2.1	0.0	2.0	9.6	11.2	(1.5)	
32	Vehicle and Fleet Additions Program	2.0	1.0	1.0	7.0	7.4	(0.4)	
33	Critical Pipeline Inspection Program	1.3	0.0	1.3	6.8	4.9	1.9	
34	Obsolete Hydrant Replacements Program	1.1	1.4	(0.2)	6.0	8.3	(2.3)	15
35	Water Meter Change Outs Program	-	0.8	(0.8)	5.8	8.3	(2.5)	16
36	EL Smith 5kV Upgrades and Electrical Room Expansion	5.0	0.1	`4.9 [´]	5.0	7.8	(2.8)	17
37	EL Smith HLPH Expansion Project	-	0.3	(0.3)	5.0	1.9	3.1	18
38	Projects < \$5 million	18.7	12.8	`5.9 [´]	82.8	70.3	12.5	19
39	Subtotal	53.2	31.0	22.3	235.4	248.7	(13.2)	
40	Performance Efficiency and Improvement						,	
41	Water Main Cathodic Protection Program	2.9	2.4	0.5	15.1	15.1	(0.0)	
42	AMI Deployment Project	12.5	0.9	11.6	62.9	63.7	(0.9)	
43	Water D&T Facility	-	14.7	(14.7)	-	16.6	(16.6)	20
44	Projects < \$5 million	1.0	0.4	` 0.7 [′]	5.1	4.5	` 0.6 [′]	
45	Subtotal	16.4	18.3	(1.9)	83.0	100.0	(16.9)	
46	Capital Expenditures	105.2	139.3	(34.1)	480.4	619.9	(139.5)	
47	Contributions			(5 11 1)	75077	31313	(10010)	
48	Water Service Connections Contributions	(5.4)	(3.8)	(1.6)	(28.4)	(33.8)	5.4	4
49	Customer Infrastructure Requests Contributions	(2.1)	(3.2)	1.0	(11.2)	(12.2)	1.0	
50	Private Development Construction Coordination Contributions	(0.2)	(0.2)	(0.0)	(1.0)	(1.1)	0.1	
51	Solar Power Systems (including BESS) Contributions	(3.6)	(3.1)	(0.5)	(3.6)	(3.1)	(0.5)	1
52	Water Treatment Plants Flood Protection Contributions	(2.3)	(2.9)	0.5	(6.7)	(18.9)	12.2	12
53	Contributions	(13.7)	(13.1)	(0.6)	(51.0)	(69.1)	18.1	'-
54	Capital Expenditures, net of Contributions	91.5	126.2	(34.7)	429.3	550.8	(121.4)	
_ J T	Suprial Expenditures, flet of Softinbations	31.3	120.2	(34.1)	TEJ.J	330.0	(121.7)	1

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Explanations for differences between PBR forecast capital expenditures and EWSI's current projection in excess of \$2.0 million include:

- kīsikāw pīsim Solar Farm and Battery Energy Storage System \$19.4 million greater than forecast. Longer than anticipated timeframes for regulatory and Bylaw approvals resulted in carryover of work from the 2017-2021 PBR term and delayed project completion. These delays meant that the solar farm was not fully commissioned until the end of 2022.
- 2. **Rossdale Ammonia Upgrades** \$7.2 million greater than forecast (new project). This project provides for the use of liquid ammonium sulphate ("LAS") in chloranimation. This upgrade was advanced to address safety considerations with aqueous ammonia which requires pressurized storage tanks as well as special handling and safety procedures.
- 3. **Phosphoric Injection for Lead Control** \$10.8 million greater than forecast (carry-over project). Although this project was scheduled for completion during the 2017-2021 PBR term, COVID-19 related delays required deferral of work and carry-over of work into the 2022-2026 PBR term.
- 4. Water Services Connections Program \$12.5 million greater than forecast. This program provides for the construction of new water services for infill developments and redevelopments and for recovery of these costs from private developers. Cost increases reflect requests from developers for larger and more complex service connections (primarily infills) than anticipated in the PBR forecast. These cost increases are partially offset by a \$5.4 million increase in expected contributions.
- 5. **Network Private Development Transmission Mains Program** \$24.9 million greater than forecast. This program provides for the reimbursement of costs of transmission mains constructed by developers, ensuring that EWSI design standards are met and the expansion is properly sized for the development being constructed, for future development, and for fire protection. The increase in costs for this program relate to an increased length of transmission mains that were not anticipated in the PBR forecast, in particular three locations; a long length of transmission main in north-east Edmonton to initiate development in the Horsehills area adjacent to Manning Freeway, a transmission main in south Edmonton required due to the required shut down of a transmission main on Ellerslie Road to accommodate road and bridge reconstruction and still support growth in the region, and finally a transmission main in southeast Edmonton to support development of the new hospital and coordination of transmission construction with road construction across the pipeline corridor in the region. EWSI may request approval for the expenditures that meet the non-routine adjustment criteria in the near future. EWSI is also assessing the timing of the construction for the \$13.4M QEII/ 41 Avenue Crossing project to mitigate these cost increases.

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- 6. LRT Relocates \$9.2 million greater than forecast. The PBR forecast was approved before the final approval and funding for the Metro/Capital Line LRT was secured. The City's approved track alignments require EWSI to complete more infrastructure relocations than anticipated in the PBR forecast. EWSI may request approval for the expenditures that meet the non-routine adjustment criteria in the near future.
- 7. **Private Development Construction Coordination** \$4.7 million greater than forecast. Expenditures on this project are forecast to increase significantly due to increases in Network Private Development Transmission Mains projects described in note 4 above.
- 8. Winterburn Booster Station Project \$7.2 million lower than forecast. The acquisition of the Parkland Booster Station from the Capital Region Parkland Water Service Commission in 2021 allowed EWSI to enhance its resilience in the Edmonton West Secondary Zone at a lower overall cost instead of building a new booster station.
- 9. Franchise Agreement Distribution Main Relocations \$12.0 million greater than forecast. EWSI has experienced higher than forecast hydrant relocation work requests from the City. EWSI may request approval for the expenditures that meet the non-routine adjustment criteria in the near future.
- 10. **Yellowhead Freeway Conversion** \$18.8 million greater than forecast. EWSI received greater volume of utility relocation requests from the City than were anticipated in the PBR forecast. EWSI may request approval for the expenditures that meet the non-routine adjustment criteria in the near future.
- 11. **Risk Based Distribution Main Renewals** \$9.7 million lower than forecast. The scope of this program has been reduced in the current PBR to enable EWSI to address high priority reliability-driven projects, in particular Water Treatment Plants Flood Protection, which have been determined to be higher overall risk.
- 12. Water Treatment Plants Flood Protection \$32.7 million greater than forecast and Water Treatment Plants Flood Protection Contributions \$12.2 million greater than forecast. The scope of this project increased mainly due to the following factors as planning and design work proceeded:
 - The complexity of flood protection infrastructure needed for the two water treatment plants, following more detailed study and review, resulting in higher than forecast costs; and
 - b. Comprehensive community consultation and close collaboration with Indigenous communities to ensure that the project is conducted with respect for cultural sensitivities, fully recognizing the archaeological, historical and cultural significance of the plant sites resulting in delayed implementation of the project than anticipated.

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EWSI was able to secure additional grant funding of \$12.2 million through the Federal Disaster Mitigation and Adaptation Fund (DMAF) and the Alberta Community Resilience Program (ACRP).

- 13. Infill Fire Protection Program \$4.7 million lower than forecast. During the 2017-2021 PBR term, EWSI worked closely with infill developers to develop criteria for funding infill fire protection, to develop forecasts of eligible projects and to forecast the funding required over the 2022-2026 PBR forecast. Based on 2022 actual results, the expected costs of this program over the 2022-2026 PBR term have been reduced to reflect lower than expected volume of investment required due to the success of the Infill Fire Protection Assessment program with Edmonton Fire Rescue services that determines the actual fire flows required based on the building structure being proposed versus being determined solely by land zoning.
- 14. E.L. Smith Stage 1 Filter Upgrades Project \$2.5 million greater than forecast. The increase is attributable to advancing the Filter 5 upgrade project in order to realize efficiencies by aligning this upgrade with similar projects undertaken at E.L. Smith during the 2022-2026 PBR term.
- 15. **Obsolete Hydrant Replacement** \$2.3 million greater than forecast. Higher than expected deficiencies have led to increased hydrant replacements. EWSI has also identified a particular model of hydrant that has seen increased failures that requires accelerated replacement due to lack of available components and to ensure fire protection service levels are maintained.
- 16. Water Meter Change outs program \$2.5 million greater than forecast. Scheduled replacements have been reassessed to align with the Advanced Metering Infrastructure (AMI) Deployment Project.
- 17. E.L. Smith 5kV Upgrades and Electrical Room Expansion \$2.8 million greater than forecast. Cost increases reflect additional complexities identified during the design phase of this project.
- 18. E.L. Smith High Lift Pump House (HLPH) Expansion Project \$3.1 million lower than forecast. Implementation of this project has been deferred to the next PBR term to enable EWSI to address high priority reliability-driven projects such as Water Treatment Plants Flood Protection.
- 19. **Reliability & Life Cycle Improvements < \$5.0 million** \$12.5 million lower than forecast. Implementation of smaller low-priority projects have been deferred to enable EWSI to address high priority projects such as Water Treatment Plants Flood Protection and Rossdale Ammonia Upgrades.

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20. Water D&T Facility – \$16.6 million greater than forecast (carry-over project). This project was expected to be completed during the 2017-2021 PBR term. The project was delayed due to changes in scope and the need to address higher than expected construction bid costs. This project, now known as the Water/Drainage Shared Facility (Aurum facility) was completed in December 2022.

2.1.6 Construction Work in Progress

In-City Water's rate base consists of plant in service. If a capital project is not completed (i.e., not placed into service) during the year, the capital expenditures on that project remain in Construction Work in Progress and are excluded from the rate base. In 2022, as shown in Table 2.1.6-1, the balance in Construction Work in Progress was \$36.8 million greater than forecast.

Table 2.1.6-1
EWSI Total System
Construction Work in Progress
(\$ millions)

	Α	В
	2022	
CWIP Continuity	Forecast	Actual
Construction work in progress, beginning of year	9.3	63.2
2 Capital expenditures		
3 Capital expenditures before contributions	105.2	170.0
4 Contributions received	(13.7)	(43.8)
5 Capital expenditures, net of contributions received	91.5	126.2
6 Capital additions		
7 Plant in service		
8 EPCOR-constructed assets	(108.7)	(158.3)
9 Developer-constructed assets	(32.2)	(26.7)
10 Total Capital Additions	(140.9)	(185.1)
11 Contributions		
12 Contributions recognized	19.1	17.1
13 Developer-constructed assets	32.2	26.7
14 Total contributed assets	51.3	43.8
15 Capital additions, net	(89.6)	(141.2)
16 Construction work in progress, end of year	11.3	48.1

The PBR plan allows EWSI to capitalize the costs of financing certain projects remaining in Construction Work in Progress, using an Allowance for Funds Utilized During Construction (AFUDC). In 2022, AFUDC included in capital expenditures on eligible projects amounted to \$2.5 million, compared to the PBR forecast amount of \$0.9 million. This difference was attributable to AFUDC on projects that were forecast to be completed in 2021, such as the Water D&T Facility and kīsikāw pīsim Solar Farm, as well as higher than forecast capital expenditure in 2022.

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2.1.7 Depreciation and Amortization

EWSI's total system depreciation expense and amortization of contributed assets for 2022 are shown in Table 2.1.7-1 below:

Table 2.1.7-1
EWSI Total System
Depreciation and Amortization
(\$ millions)

		Α	В
		20	22
	Depreciation and Amortization	PBR	
		Forecast	Actual
1	Gross depreciation expense	58.9	57.0
2	Amortization of contributions	(13.1)	(12.7)
3	Depreciation, net	45.8	44.3
4	In-City Water share - %	85.0%	85.0%
5	In-City Water share - \$	38.9	37.6

Depreciation expense and amortization of contributions in 2022 were slightly lower than forecast due to lower than forecast opening asset balances as shown in Table 2.1.8-1.

2.1.8 Rate Base

In 2022, EWSI's total water system rate base, shown in Table 2.1.8-1 below, was \$58.3 million lower than forecast, largely due to lower opening asset balances related to delays in completing projects originally scheduled for completion during the 2017-2021 PBR term.

Table 2.1.8-1 EWSI Total System Mid-Year Rate Base (\$ millions)

		A	В
		202	2
	Description	PBR	
		Forecast	Actual
1	Plant in service, beginning of year	2,911.2	2,798.9
2	Capital additions		
3	EPCOR-funded	89.6	141.2
4	Developer-funded	51.3	43.8
5	Capital additions	140.9	185.1
6	Retirements and adjustments	-	(4.8)
7	Plant in service, end of year	3,052.2	2,979.2
8	Accumulated depreciation, beginning of year	738.0	716.2
9	Gross provision	58.9	57.0
10	Retirements and adjustments	-	(4.8)
11	Accumulated depreciation, end of year	796.9	768.5
12	Mid-Year Net Property	2,214.3	2,146.7
13	Other Rate Base Items		
14	Materials and supplies	4.0	4.8

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		Α	В
		202	2
	Description	PBR	
		Forecast	Actual
15	Working capital	15.4	(2.4)
16	Gross Mid-Year Rate Base	2,233.6	2,149.2
17	Contributions, beginning of year	880.8	857.8
18	Developer contributions		
19	Contributed assets	32.2	26.7
20	Contributions	19.1	17.1
21	Developer contributions	51.3	43.8
22	Retirements and adjustments	-	(0.0)
23	Contributions, end of year	932.2	901.6
24	Accumulated amortization, beginning of year	203.6	203.3
25	Gross provision	13.1	12.7
26	Retirements and adjustments	-	(0.2)
27	Accumulated amortization, end of year	216.7	215.8
28	Mid-Year Net Contributions	696.4	670.2
29	Mid-Year Rate Base	1,537.3	1,479.0
30	In-City Water share - %	86.5%	87.1%
31	In-City Water share - \$	1,329.2	1,287.5

2.1.9 Return on Rate Base

In-City Water was initially awarded a Return on Equity (ROE) of 9.89% for the 2022-2026 PBR Term, which, pursuant to City Council direction, was reduced to 9.64% to reflect the reduction in business risk provided by the consumption deferral account. In the PBR forecast, the special rate adjustment for rebasing was smoothed over the PBR term to mitigate "rate shock" at the beginning of the PBR term. The special rate adjustment for rebasing accounts for the difference between EWSI's revenue requirement forecast for the PBR term and the revenue that would be realized if annual rate increases were limited to inflation. Therefore, although EWSI's 2022-2026 PBR term is based on its awarded rate of return on 9.64%, PBR forecast rates of return for individual years of the PBR will differ from awarded ROE, with a 7.90% ROE forecast for 2022 due to the phasing in of the rebasing adjustment.

In 2022, In-City Water's return on rate base was \$1.7 million greater than forecast. Approximately \$0.7 million was attributable to higher cost of debt (see Table 2.1.9-1) and the remaining \$1.0 million attributable to higher than forecast customer growth and variation in operations and maintenance expenses explained in Section 2.1.3.

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Table 2.1.9-1 In-City Water Return on Mid-Year Rate Base (\$ millions)

		Α	В
		20	22
	Return on Rate Base	PBR	
		Forecast	Actual
1	In-City Water share - \$	1,329.2	1,287.5
2	Deemed capital structure		
3	Debt (%)	60%	60%
4	Equity (%)	40%	40%
5	Cost of capital		
6	Cost of debt	4.17%	4.39%
7	Cost of equity	7.90%	8.36%
8	Return on Mid-Year Rate Base		
9	Return on Rate Base Financed by Debt	33.2	33.9
10	Return on Rate Base Financed by Equity	42.0	43.0
11	Total Return on In-City Water Rate Base	75.2	76.9

Return on rate base is calculated separately for the debt-financed and equity-financed portions of In-City Water's net rate base. The rate of return on debt is equal to the embedded cost of debt for EWSI's total water system, as calculated in Table 2.1.9-2 below:

Table 2.1.9-2
EWSI Water Services
Interest Expense and Cost of Debt
(\$ millions)

		Α	В
		20	22
	Interest Expense and Cost of Debt	PBR	
		Forecast	Actual
1	Interest expense		
2	Interest on short-term debt	0.8	1.6
3	Interest on long-term debt	37.4	37.3
4	Total interest expense	38.3	38.9
5	Mid-year debt		
6	Mid-year short-term debt	34.5	23.1
7	Mid-year long-term debt	883.4	863.4
8	Mid-year debt	918.0	886.5
9	Average cost of debt	4.17%	4.39%

The embedded cost of debt was higher in 2022 due to higher than forecast interest rates on new debt issues related to the Bank of Canada's rate hikes during 2022. Under the terms of the PBR Plan, EWSI bears interest rate risk and therefore, higher than forecast debt costs are not borne by ratepayers. EWSI expects interest rates to remain higher than forecast for the majority of the PBR term.

2.1.10 Transactions with Affiliates

In-City Water derives a portion of its revenue and expenses from transactions with affiliates, including the City of Edmonton, EUI and its subsidiaries, and other EWSI business units. Table 2.1.10-1 provides a summary of In-City Water's 2022 actual and forecast transactions with affiliates.

Table 2.1.10-1
EWSI Total System
Transactions with Affiliates
(\$ millions)

(\$ millions)					
		Α	В		
		202	22		
	Affiliate and Service	PBR			
		Forecast	Actual		
1	Revenues from the provision of services to the City of Edmonton				
2	Public fire protection	3.1	3.1		
3	Water sales	3.5	3.6		
4	Total	6.6	6.7		
5	Services provided by (recovered from):				
6	City of Edmonton				
7	Franchise fees	16.8	17.6		
8	Property taxes	0.8	0.7		
9	Mobile equipment services	2.5	0.7		
10	Other services	0.7	(0.0)		
11	Total	20.8	19.1		
12	EPCOR Utilities Inc.				
13	Corporate shared services	13.6	13.7		
14	Interest on intercompany debentures	37.4	37.3		
15	Interest on short-term debt	0.8	1.6		
16	Other services	0.4	0.5		
17	Total	52.2	53.1		
18	EPCOR Energy Alberta LP	5=			
19	Customer billing and collection services	8.2	8.8		
20	Trouble call support services and other services	0.5	0.6		
21	Total	8.7	9.5		
22	Other EPCOR Utilities Inc. subsidiaries	0	0.0		
23	Hydrovac charges and space rentals from EPCOR Technologies Inc.	1.7	0.9		
24	Other services (recoveries) from EPCOR Distribution and Transmission Inc.	0.0	(0.1)		
25	Other recoveries from EPCOR Power Development	(0.2)	(0.3)		
26	Total	1.5	0.5		
27	Other EWSI Business Units		0.0		
28	Water shared services	10.5	12.5		
29	Water sales to Wastewater Treatment	(0.5)	(0.4)		
30	Meter reading services (recoveries) from Wastewater Treatment	(2.8)	(2.3)		
31	Meter reading services (recoveries) from Drainage Services	(2.8)	(2.3)		
32	Drainage Services rent (recoveries)	(0.4)	(0.3)		
33	Drainage Services other services	(0.2)	(0.4)		
34	Total	3.8	6.7		
	Expenditures on capital projects arising from services provided by:	0.0	0.7		
36	City of Edmonton	0.5	0.2		
37	EPCOR Technologies Inc.	4.5	5.7		
38	EPCOR Utilities Inc.	1.4	0.5		
39	EPCOR Drainage Services	2.8	2.3		
40	EPCOR Distribution and Transmission Inc.	0.2	0.8		
41	Other EPCOR Business Units	0.2	0.0		
42	Total	9.5	9.6		
44	Total	შ.ე	3.0		

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2.2 Wastewater Treatment

Wastewater's rate revenue and revenue requirements are summarized in Table 2.2-1 below.

Table 2.2-1
Wastewater Treatment Revenue Requirements
(\$ millions)

		А	В
		20	22
		PBR	
	Description	Forecast	Actual
1	Regulated revenue	122.1	124.2
2	Revenue requirement		
3	Operations and maintenance expenses	70.8	70.6
4	Less: revenue offsets	(5.9)	(7.2)
5	Depreciation and amortization	23.2	23.3
6	Return on rate base financed by debt	12.3	12.4
7	Return on rate base financed by equity	21.7	25.1
8	Revenue requirement	122.1	124.2
9	Return on rate base financed by equity*	9.94%	12.44%

^{*} In the PBR forecast, the special rate adjustment for rebasing is smoothed over the PBR term to mitigate "rate shock" at the beginning of the PBR term. Therefore, although EWSI's PBR forecast for the 2022-2024 PBR term is based on its awarded rate of return on 9.64%, PBR forecast rates of return for individual years of the PBR will differ from awarded ROE.

In 2022, EWSI achieved a greater than forecast rate of return on equity of 12.44%. The factors contributing to forecast to actual differences are explained in Sections 2.2.1 to 2.2.9.

2.2.1 Customers and Consumption

Wastewater's customer counts, consumption and consumption per customer are similar to those of In-City Water.

Wastewater has two customer classes:

- Residential Customer Class. Unlike In-City Water, there are no separate rates for multiresidential customers. Instead, multi-residential water customers are subject to the same
 rates as residential wastewater customers. The common rate structure for residential and
 multi-residential customers recognizes that the costs of wastewater treatment are similar
 for both residential and multi-residential customers. Accordingly, charges to residential
 customers are based on a flat rate structure with a single consumption block.
- Commercial Customer Class. Consumption charges for commercial customers are based on a declining rate structure with three consumption blocks to recognize the economies of scale in wastewater treatment for larger commercial customers. In addition, commercial customers are charged overstrength fees for prescribed materials that exceed the concentrations shown in Part III of Schedule 1 to Bylaw 19627.

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Differences in customer counts, almost entirely within the commercial customer class, are attributable to "water-only" customers who are not tied into the City's drainage system. Water-only customers include businesses in industrial parks that are served by septic systems, as well as seasonal water customers, such as commercial lawn watering services and golf courses. Table 2.2.1-1 below provides a comparison of 2022 PBR forecast to actual customer counts and consumption per customer.

Table 2.2.1-1
Wastewater
Customers, Consumption and Consumption per Customer

		Α	В
		20	22
		PBR	
	Customers and Consumption	Forecast	Actual
1	Customers		
2	Residential	278,868	282,366
3	Multi-Residential	3,789	3,800
4	Commercial	17,069	17,283
5	Total	299,725	303,449
6	Annual Consumption - ML		
7	Residential	44,853	46,856
8	Multi-Residential	17,658	18,501
9	Commercial	18,819	22,087
10	Total	81,330	87,444
11	Monthly Consumption per Customer		
12	Residential	13.4	13.8
13	Multi-Residential	388.4	405.7
14	Commercial	91.9	106.5

Actual to forecast differences in Wastewater's customer counts and consumption are attributable to the same factors discussed in Section 2.1.

2.2.2 Revenue

Wastewater's rates include fixed monthly services charges applied on a per connection basis, and consumption charges applied to each cubic metre of consumption. Besides rate revenues, Wastewater's other revenue consists primarily of over-strength surcharges that are subject to the same rate adjustment mechanism as Wastewater's rate revenue. The remaining other revenue is derived from a variety of sources, including provision of services to the Alberta Capital Region Wastewater Commission and other suburban customers, sale of nutrients derived from Ostara, late payment charges, and various other services. The effect of the consumption deferral for wastewater is summarized in Table 2.2.2-1 and Table 2.2.2-2 below. Actual consumption from the beginning of the PBR term effective April 1, 2022 to December 31, 2022 was 4,966 ML greater than forecast, resulting in a deferral of \$5.5 million, which will be refunded to customers in the next PBR term.

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Table 2.2.2-1
Wastewater Treatment Consumption Deferral

		Α	В	С	D
		Consumption (ML)		Consumption Deferral	
		PBR			
		Forecast	Actual	ML	\$M
1	Residential	34,378	35,865	1,487	1.8
2	Multi-Residential	13,351	14,086	735	0.9
3	Commercial	14,594	17,338	2,744	2.7
4	Total Consumption	62,323	67,289	4,966	5.5

Table 2.2.2-2 below provides a comparison of Wastewater's 2022 actual and forecast revenue.

Table 2.2.2-2
Wastewater Treatment Revenue
(\$ millions)

	(ψ πιπιοπο)	Ι	D
		А	В
		2022	
Wastewater Treatment Revenue		PBR	
		Forecast	Actual
1	Fixed Monthly Service Charges		
2	Residential	19.9	20.1
3	Multi-Residential	0.3	0.3
4	Commercial	1.2	1.2
5	Fixed Monthly Service Charges	21.4	21.6
6	Consumption Charges		
7	Residential	53.2	55.6
8	Multi-Residential	20.9	22.0
9	Commercial	21.2	24.0
10	Consumption Charges	95.4	101.6
11	Less: Consumption Deferral		
12	Residential	-	(1.8)
13	Multi-Residential	-	(0.9)
14	Commercial	-	(2.7)
15	Consumption Deferral	-	(5.5)
16	Consumption Revenue, net of deferrals		
17	Residential	53.2	53.8
18	Multi-Residential	20.9	21.1
19	Commercial	21.2	21.3
20	Consumption Revenue, net of Deferral	95.4	96.2
21	Overstrength surcharges	5.4	6.4
22	Regulated Revenue (Line 5 + 20 + 21)	122.1	124.2
23	Other revenue ("revenue offsets")	5.9	7.2
24	Revenue	128.0	131.4

Wastewater's revenues were \$3.4 million greater than forecast in 2022. This difference was primarily due to the following factors:

 Higher than forecast consumption during the first three months of 2022, prior to the implementation of the consumption deferral;

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- Higher than forecast overstrength surcharges due to higher surchargeable matter in the effluent from industrial customers; and
- Higher than forecast other revenue of \$1.1 million reflecting increased volume of biosolids management and treatment of effluent for Alberta Capital Region Wastewater Commission (ACRWC). The remainder of the variance was related to numerous items, none of which were individually significant.

2.2.3 Operating Expenses by Function

Table 2.2.3-1 below provides a comparison of Wastewater Treatment operating expenses for 2022 to the PBR forecast.

Table 2.2.3-1
Wastewater Treatment Operating Expenses by Function
(\$ millions)

		Α	В	
			2022	
	Function	PBR Forecast	Actual	
1	Power, Other Utilities and Chemicals			
2	Power and Other Utilities	5.8	4.9	
3	Chemicals	1.5	1.4	
4	Power, Other Utilities and Chemicals	7.2	6.3	
5	Wastewater Treatment			
6	Wastewater Treatment Plant	32.4	31.2	
7	Operations Support Services	6.2	5.6	
8	Less: Capitalized Overhead Costs	(3.3)	(2.3)	
9	Wastewater Treatment	35.4	34.5	
10	Billing, Meters and Customer Service	7.9	7.6	
11	EWSI Shared Services	5.0	6.4	
12	Corporate Shared Services	5.2	5.2	
13	Franchise Fees and Property Taxes	10.0	10.6	
14	Total Operating Expenses	70.8	70.6	

Overall, Wastewater's operating expenses for 2022 were \$0.2 million lower than forecast. Key factors contributing to this difference include:

- **Power and Other Utilities** \$0.9 million lower than forecast in 2022 due to lower than forecast power consumption and credits received for the energy curtailment program.
- Wastewater Treatment \$1.1 million lower than forecast in 2022 primarily due to lower than forecast biosolids management costs; partially offset by lower capitalized overhead. The remainder of the variance results from numerous small items, none of which were individually significant.

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- Billing, Meters and Customer Service \$0.3 million lower than forecast in 2022 primarily due to vacant meter reading positions and project delays related to the AMI project. These decreases, which amounted to \$0.5 million, were partially offset by higher fees for customer service, billing and collections service provided by EPCOR Energy Alberta GP Inc. due to higher than forecast growth in residential services.
- **EWSI Shared Services** \$1.4 million greater than forecast primarily due to higher salary and labour costs.
- Franchise Fees and Property Taxes \$0.6 million higher than forecast in 2022. Franchise fees are calculated as 8% of eligible revenue less the municipal portion of property taxes. As noted in Section 2.2.2 above, Wastewater revenues were higher than forecast, resulting in higher franchise fees paid to the City of Edmonton in 2022.

2.2.4 Operating Expenses by Cost Category

Table 2.2.4-1 below provides a breakdown of operating expenses by cost category for rows 9, 10 and 11 from Table 2.2.3-1

Table 2.2.4-1
Wastewater Treatment Operating Costs by Cost Category
(\$ millions)

(\psi \text{Illinois})				
		Α	В	
		2022		
	Cost Category	PBR Forecast	Actual	
1 2 3 4 5 6	Wastewater Treatment Plant Operations Staff costs and employee benefits Contractors and consultants Materials and supplies Vehicles Other	16.9 14.3 2.1 0.1 2.0	17.5 12.3 3.7 0.3 0.8	
7	Wastewater Treatment Plant Operations Expenses	35.4	34.5	
8 9 10	Billing, Meters and Customer Service Customer billing and collection services Contractors and consultants	3.4 4.5	3.7 3.9	
11	Billings, Meters and Customer Services Expenses	7.9	7.6	
12 13 14 15	EWSI Shared Services EWSI shared services allocation Staff costs and employee benefits Other	3.3 1.4 0.3	3.9 2.4 0.1	
16	EWSI Shared Services	5.0	6.4	

2.2.5 Capital Expenditures by Major Project and Category

Table 2.2.5-1 compares approved capital expenditures from the PBR forecast to actual capital expenditures for 2022 for each project with approved or forecast capital expenditures in excess of \$5.0 million over the 2022-2024 PBR term, as well as for each project category.

Table 2.2.5-1
Wastewater Treatment Capital Expenditures
(\$ millions)

		Α.	,			_		7
		Α	В	С	D	Е	F	
			2022			2022-2024		
		PBR			PBR			
	Major Category and Project	Forecast	Actual	Variance	Forecast	Projection	Variance	<u>Note</u>
1	Health, Safety and Environment			-			-	
2	Maintenance Hygiene Improvements	-	3.1	(3.1)	-	6.2	(6.2)	1
3	Projects < \$5 million	0.2	0.9	(0.7)	0.8	1.8	(1.0)	
4	Sub-total	0.2	4.0	(3.8)	0.8	8.0	(7.2)	
5	Regulatory							
6	Odour Control Improvements	0.8	0.1	0.7	5.6	7.4	(1.8)	
7	Projects < \$5 million	-	0.4	(0.4)	-	0.5	(0.5)	
8	Sub-total	0.8	0.5	0.3	5.6	7.9	(2.4)	
9	Growth/Customer Requirements			-			-	
10	Projects < \$5 million	2.8	2.2	0.6	5.5	5.2	0.3	
11	Reliability and Life Cycle Improvements			-			-	
12	Digester 4 Upgrades Project	4.0	1.0	3.0	13.4	18.6	(5.2)	2
13	Utility Rack West	-	0.0	(0.0)	-	9.5	(9.5)	3
14	Square 1 Biogas System Upgrade	-	3.6	(3.6)	-	12.0	(12.0)	4
15	Gold Bar Primary Effluent Channel Upgrades	3.3	0.4	2.9	17.0	4.4	12.5	5
16	Aux Control Room E-House (EB-1)	1.9	0.3	1.6	11.2	5.0	6.2	6
17	600v Electrical Building (EB-2)	1.5	0.3	1.2	11.8	1.9	10.0	7
18	Clover Bar Dewatering Facility	14.6	0.4	14.2	38.4	0.6	37.8	8
19	EPT Scrubber Upgrades	-	10.3	(10.3)	-	14.9	(14.9)	9
20	Expand Flare Capacity	1.1	0.1	1.0	8.0	2.7	5.3	10
21	Projects < \$5 million	16.1	20.2	(4.2)	41.6	65.4	(23.8)	11
22	Sub-total	42.5	36.7	5.9	141.4	135.0	6.3	
23	Performance Efficiency and Improvement			_			-	
24	Secondary Aeration Blower Upgrades	0.8	0.5	0.3	8.0	9.7	(1.7)	
25	Laboratory Facility Consolidation	2.9	0.0	2.8	5.9	5.4	` 0.Ś	
26	Projects < \$5 million	2.1	1.8	0.3	4.5	5.7	(1.2)	
27	Sub-total	5.8	2.3	3.5	18.4	20.8	(2.4)	1
28	Capital Expenditures	52.1	45.7	6.4	171.7	177.0	(5.3)	1

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Explanations for differences between PBR forecast capital expenditures and Wastewater's current projection in excess of \$2.0 million include:

- 1. Maintenance Hygiene Improvements \$6.2 million greater than the 2022-2024 PBR forecast (carry-over project). The Maintenance Hygiene Improvements project was originally planned to be completed by the end of 2021. However, following extensive stakeholder consultation in relation to the Gold Bar Integrated Resource Plan (IRP) and this project, significant scope adjustments were made to the project, resulting in project delay and cost increases related to supply chain. This additional cost is expected to be managed through prioritization of projects and programs approved for the 2022-2024 PBR and is offset by the deferral of the new dewatering facility.
- 2. Digester 4 Upgrades Project \$5.2 million greater than the 2022-2024 PBR forecast. The increase is primarily due to higher commodity prices and inflation. Work on the Digester 4 project was delayed due to leak issues that were experienced during completion of the Digester 3 Upgrades project, and the shutdown of Digester 5 due to structural concerns. Furthermore, completing Digester 3 before commencing Digester 4 provided better operational capacity and reliability with Digester 3 returning to service.
- 3. **Utility Rack West** \$9.5 million greater than the 2022-24 PBR forecast. This project was not included in the 2022-2024 PBR forecast. However, this project has been advanced to facilitate efficient delivery of The Aux Control Room Electrical Upgrade Project (EB-1) and the 600V Electrical Building Project (EB-2) by utilizing pipe racks to support the re-routing of electrical cables to the new electrical buildings.
- 4. **Square 1 Biogas System Upgrade** \$12.0 million greater than the 2022-24 PBR forecast. The project was partially deferred from the 2017-2021 PBR term to the 2022-2024 PBR term due to a revision in the engineering solution to relocate new gas mixing compressors to a separate enclosure. In addition, project is expected to cost more than previously forecast due to increased construction and process skid supply costs.
- 5. **Gold Bar Primary Effluent Channel Upgrades Project** \$12.5 million lower than the 2022-24 PBR forecast. Given the complexities and risks associated with the project, additional design and engineering work has been extended delaying project completion into the next PBR term. EWSI expects the project will go into service in 2026.
- 6. **Aux Control Room E-House (EB-1)** \$6.2 million lower than the 2022-24 PBR forecast. Through the design development process, the duration of this project has been extended to better plan for addressing the complexities of commissioning and transferring electrical loads to minimize operations disruptions. This has shifted some of the work for this project into the next PBR term.
- 7. **600v Electrical Building (EB-2)** \$10.0 million lower than the 2022-24 PBR forecast. Through the design development process, the duration of this project has been extended to

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better plan for addressing the complexities of commissioning and transferring electrical loads to minimize operations disruptions. This has shifted some of the work for this project into the next PBR term.

- 8. Clover Bar Biosolids Dewatering Facility \$37.8 million lower than the 2022-24 PBR forecast. The Dewatering Facility project is currently deferred due to expected high costs and will be reassessed in the next PBR application. EWSI is reviewing a number of alternatives including the long-term viability of using a third-party mobile dewatering facility, which is currently being used temporarily while the current dewatering facility is shut down.
- 9. Enhanced Primary Treatment (EPT) Scrubber Upgrades \$14.9 million higher than the 2022-24 PBR forecast. The EPT Scrubber Upgrades project was originally part of the Site HVAC Rehabilitation project to be completed in 2021 at a total cost of \$9.5M. During the design development of the project, the EPT Scrubber Upgrades project was identified and set up as a standalone project. The project was subsequently delayed and is scheduled for completion in 2023. The increased cost is primarily due to a combination of project scope and design refinements, and a general increase in costs related to market conditions.
- 10. **Expand Flare Capacity** \$5.3 million lower than the 2022-24 PBR forecast. Implementation of this project has been deferred to the next PBR to address other critical projects approved in the current PBR.
- 11. **Projects < \$5 million** Explanations for some of the larger projects making up the variance under this category include:
 - a. Clover Bar Edmonton Waste Management (EWMC) Groundwater Transfer This \$3.1 million project was not included in the 2022-2024 PBR forecast. The project was initiated to support the City of Edmonton in addressing groundwater release management in response to regulatory requirements imposed on the City's waste management operations. EWSI expects the project to be completed in 2025.
 - b. Gold Bar Operation Center \$3.3 million higher than 2022-24 PBR forecast primarily due to project delays resulting from protracted stakeholder engagement requirements and scope changes.
 - c. Gold Bar Loop 5 Rehab and Upgrade This \$3.1 million project was scheduled for the 2025-2027 PBR term. However, the project was advanced to meet operational heating requirements as the equipment is at the end of its useful life. The project will replace the remaining equipment on heating Loop 5. EWSI expects the commissioning of the system in 2023.

2.2.6 Construction Work in Progress

Wastewater's rate base consists of plant in service. If a capital project has not been completed (i.e., not placed into service) during the year, the capital expenditures on that project remain in Construction Work in Progress and are excluded from the rate base. The 2022 year-end balance of Wastewater's Construction Work in Progress, shown in Table 2.2.6-1 below, was \$8.0 million greater than forecast, almost entirely due to changes in the timing of project completion.

Table 2.2.6-1
Wastewater Treatment Construction Work in Progress
(\$ millions)

		Α	В
			22
	Construction Work in Progress	PBR	
		Forecast	Actual
1	Balance, beginning of year	13.9	43.1
2	Capital expenditures	52.1	45.7
3	Capital additions	(21.1)	(35.8)
4	Balance, end of year	45.0	53.0

The PBR plan allows EWSI to capitalize the costs of financing certain projects remaining in Construction Work in Progress, using AFUDC. In 2022, because of the higher average balance of Construction Work in Progress, AFUDC included in capital expenditures on eligible projects amounted to \$2.6 million, compared to the PBR forecast amount of \$1.7 million.

2.2.7 Depreciation and Amortization

Wastewater's depreciation expense and amortization of contributed assets for 2022 are shown in Table 2.2.7-1 below:

Table 2.2.7-1
Wastewater Treatment Depreciation and Amortization
(\$ millions)

		Α	В
			22
	Depreciation and Amortization	PBR	Actual
		Forecast	Actual
1	Gross depreciation expense	24.2	24.2
2	Amortization of contributions	(0.9)	(0.9)
3	Depreciation, net	23.2	23.3

Wastewater's 2022 depreciation expense was in line with forecast despite lower than forecast plant in service at the end of 2022, (see Table 2.2.8-1, line 5). This was primarily due to the completion of a higher number of capital maintenance and repair projects with shorter expected useful life, resulting in higher effective depreciation.

2.2.8 Rate Base

Wastewater's 2022 mid-year rate base, shown in Table 2.2.8-1 below, was \$41.9 million lower than forecast, reflecting lower than forecast capital additions over the 2017 to 2021 period resulting from project deferrals and other adjustments to the capital program described in Section 2.2.5.

Table 2.2.8-1
Wastewater Treatment Mid-Year Rate Base (\$ millions)

	· · · · · · · · · · · · · · · · · · ·	А	В
		202	22
	Components of Mid-Year Rate Base, net of Contributions	PBR	
		Forecast	Actual
1	Plant in Service		
2	Balance, beginning of year	785.5	738.1
3	Capital additions	21.1	35.8
4	Retirements and adjustments	-	(4.1)
5	Balance, end of year	806.6	769.9
6	Mid-Year Plant in service	796.1	754.0
7	Accumulated Depreciation		
8	Balance, beginning of year	218.3	212.9
9	Depreciation expense	24.2	24.2
10	Retirements and adjustments	-	(4.1)
11	Balance, end of year	242.4	233.0
12	Mid-Year Accumulated Depreciation	230.4	222.9
13	Other Rate Base Items		
14	Working Capital	(0.8)	(8.7)
15	Materials and Supplies	1.4	2.2
16	Gross Mid-Year Rate Base	566.3	524.5
17	Contributions		
18	Balance, beginning of year	41.0	41.0
19	Contributions in aid of construction	-	-
20	Balance, end of year	41.0	41.0
21	Mid-Year Contributions	41.0	41.0
	Accumulated Amortization		
23	Balance, beginning of year	20.2	20.2
24	Amortization of contributions	0.9	0.9
25	Balance, end of year	21.2	21.2
26	Mid-Year Accumulated Amortization	31.1	31.1
27	Mid-Year Contributions	20.3	20.3
28	Mid-Year Rate Base	546.1	504.2

Unlike In-City Water, where contributions relate primarily to developer-funded assets, contributions included in Wastewater's rate base offset the cost of non-utility assets included in Wastewater's plant in service. This treatment ensures that the capital costs associated with these assets are not borne by utility ratepayers. The cost of operating these assets, as well as any related revenues are also excluded from Wastewater's financial results.

2.2.9 Return on Rate Base

In 2022, Wastewater's return on equity, shown in Table 2.2.9-1, was \$3.4 million greater than forecast enabling Wastewater to achieve a return on equity of 12.44% in 2022. The increase in return on equity was primarily attributed to the increase in overstrength charges to industrial customers, and other revenue as noted in Section 2.2.2. The lower than forecast rate base also contributed to the higher rate of return on equity.

Table 2.2.9-1
Wastewater Treatment Return on Rate Base (\$ millions)

		А	В
		202	22
Return on Ra	ate Base	PBR	
		Forecast	Actual
1 Mid-year Rate Base		546.1	504.2
2 Deemed Capital Structure			
3 Debt (%)		60.00%	60.00%
4 Equity (%)		40.00%	40.00%
5 Cost of Capital			
6 Cost of Debt		3.75%	4.09%
7 Cost of Equity		9.94%	12.44%
8 Weighted Average Cost o	f Capital (WACC)	6.11%	7.43%
9 Return on Mid-Year Rate	Base		
10 Return on Rate Base Fi	nanced by Debt	12.3	12.4
11 Return on Rate Base Fi	nanced by Equity	21.7	25.1
12 Return on Mid-year Rate	Base	34.0	37.4

Wastewater's weighted average cost of debt is shown in Table 2.2.9-2 below. The embedded cost of debt was higher in 2022 due to higher than forecast interest rates on new debt issues related to the Bank of Canada's rate hikes during 2022. Under the PBR Plan, EWSI bears interest rate risk and therefore, higher than forecast debt costs are not borne by ratepayers. EWSI expects interest rates to remain higher than forecast for the majority of the PBR term.

Table 2.2.9-2
Wastewater Treatment Interest Expense and Cost of Debt
(\$ millions)

	Α	В
	202	22
Interest Expense and Cost of Debt	PBR	
	Forecast	Actual
1 Interest Expense		
2 Interest on short-term debt	0.8	1.1
3 Interest on intercompany debentures	11.9	12.0
4 Total Interest expense	12.7	13.1
5 Mid-year debt and other long-term liabilities		
6 Mid-Year Short-term debt	35.1	12.1
7 Mid-Year Long-term debt	303.6	308.5
8 Total Mid-year debt and other long-term liabilities	338.7	320.5
9 Embedded cost of Debt	3.75%	4.09%

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2.2.10 Transactions with Affiliates

Wastewater derives a portion of its revenue and expenses from affiliate transactions including the City of Edmonton, EUI, and its subsidiaries, and other EPCOR Water Services Inc. business units. Table 2.2.10-1 summarizes Wastewater's transactions with affiliates.

Table 2.2.10-1
Wastewater Treatment Transactions with Affiliates
(\$ millions)

		Α	В
		20	22
	Affiliate and Service	PBR	
		Forecast	Actual
1	Revenues from the provision of services to the City of Edmonton		
2	Wastewater Treatment Services	1.4	1.6
3	Services provided by (recovered from):		
4	City of Edmonton		
5	Franchise Fees	9.3	9.9
6	Property Taxes	0.7	0.7
7	Regulatory Services	0.2	-
8	Biosolids Contractor Service	0.4	0.6
9	Other Services	0.2	0.1
10	Total	10.8	11.3
11	EPCOR Utilities Inc.		
12	Corporate Shared Service Costs	5.2	5.2
13	Interest on Intercompany Loans	11.9	12.0
14	Interest on Short-term debt	0.8	1.1
15	Other Services	0.1	0.3
16	Total	18.0	6.6
17	EPCOR Energy Alberta LP		
18	Billing and Collection Services	3.0	3.0
19	Other EWSI Business Units		
20	EWSI Shared Services Allocation	3.3	3.9
21	Meter reading services from In-City Water	2.8	2.3
22	Water purchases from In-City Water	0.4	0.4
23	Regulatory services from Drainage Services	1.7	1.6
24	Laboratory services recoveries from Drainage Services	(0.4)	(0.3)
25	Total	7.9	7.9
26	Expenditures on capital projects arising from services provided by:		
27	City of Edmonton	0.0	0.1
28	EPCOR Technologies Inc.	0.1	0.2
29	EPCOR Utilities Inc.	0.1	0.2
30	Total	0.3	0.5

2.3 Drainage Services

Drainage Services provides sanitary utility and stormwater utility services within the boundaries of the City of Edmonton. These services are regulated by the City of Edmonton pursuant to the PBR Plan for 2022 to 2024 prescribed in Drainage Services and Wastewater Treatment Bylaw 19627. Drainage Services revenue and revenue requirements are summarized in Table 2.3-1 below.

Table 2.3-1
Drainage Services
Revenue and Revenue Requirement
(\$ millions)

		Α	В
		2022	
		PBR	
		Forecast	Actual
1	Regulated revenue		
2	Sanitary utility	143.6	144.7
3	Stormwater Utility	92.8	93.9
4	Regulated revenue	236.4	238.6
5	Revenue requirement		
6	Operating costs	122.4	127.7
7	Less: revenue offsets	(6.3)	(5.3)
8	Depreciation and amortization	42.0	39.7
9	Return on rate base financed by debt	34.5	34.7
10	Return on rate base financed by equity	43.8	41.8
11	Revenue requirement	236.4	238.6
12	Rate of return on rate base financed by equity*	6.31%	6.18%

^{*} In the PBR forecast, the special rate adjustment for rebasing is smoothed over the PBR term to mitigate "rate shock" at the beginning of the PBR term. Therefore, although EWSI's PBR forecast for the 2022-2024 PBR term is based on achieving a fair rate of return of 9.95% by 2026, PBR forecast rates of return for individual years of the PBR will differ from awarded ROE.

In 2022, EWSI achieved a rate of return on equity of 6.18%, slightly lower than its forecast rate of return of 6.31%. The factors contributing to differences between forecast and actual are explained in Sections 2.3.1 to 2.3.9.

2.3.1 Customers and Consumption

Drainage Services provides sanitary and stormwater utility services to the same customers served by Wastewater. Therefore, actual to forecast differences in Drainage Services' customer counts and consumption are attributable to the same factors discussed in section 2.2.1.

2.3.2 Revenue

Drainage Service's rate revenues are derived from both sanitary utility and stormwater utility services. Sanitary utility revenues are comprised of flat monthly service charges based on meter

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size and variable monthly charges based on monthly metered water consumption. Stormwater utility revenues are based on parcel area, development intensity, and run-off coefficients based on the zoning of individual land parcels.

For the 2022-2024 PBR term, City Council directed Drainage Services to establish "a deferral account for water consumption for each of Water Services, Wastewater Treatment and Drainage Services that would be accumulated during the 2022-2026 and 2022-2024 PBR terms and included in customer rates in each of the next PBR terms through a special rate adjustment".

The effect of the consumption deferral for the sanitary utility is summarized in Table 2.3.2-1 below. This table shows that actual consumption from the beginning of the 2022-2024 PBR term starting April 1, 2022, to December 31, 2022, was 4,958 ML greater than forecast, resulting in a deferral of \$6.1 million that will be refunded to customers in the next PBR term.

Table 2.3.2-1
Drainage Services
Sanitary Utility Consumption Deferral

		Α	В	С	D		
		Consumption (ML)		Consumption (ML)		Consumpti	on Deferral
		PBR					
		Forecast	Actual	ML	\$M		
1	Residential	34,378	35,865	1,487	1.9		
2	Multi-residential	13,351	14,086	734	0.9		
3	Commercial	14,590	17,327	2,736	3.3		
4	Total Consumption	62,319	67,277	4,958	6.1		

Table 2.3.2-2 below provides a comparison of Drainage Services 2022 revenues to the PBR forecast. In 2022, sanitary rate revenues were \$1.1 million greater than forecast and stormwater utility rate revenues were \$1.1 million greater than forecast. After adjusting for the consumption deferral, actual to forecast differences for both sanitary utility and stormwater utility rate revenue were attributable to higher than forecast customer growth. The variance in other revenue was comprised of numerous small differences in revenues derived from various sources such as biosolids management, compliance and monitoring, late payment charges, etc., none of which were individually significant.

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Table 2.3.2-2 Drainage Services Revenue (\$ millions)

		Α	В
		20	22
		PBR	
	Description	Forecast	Actual
1	Sanitary Utility		
2	Flat monthly charges		
3	Residential	36.4	36.9
4	Multi-residential:	2.4	2.4
5	Commercial, including large wholesale	6.0	6.1
6	Flat monthly charges	44.8	45.4
7	Variable monthly charges billed		
8	Residential	55.0	57.5
9	Multi-residential	21.7	22.7
10	Commercial, including large wholesale	22.0	25.2
11	Variable monthly charges billed	98.7	105.5
12	Consumption deferral		
13	Residential	-	(1.9)
14	Multi-residential	-	(0.9)
15	Commercial, including large wholesale	-	(3.3)
16	Consumption deferral	1	(6.1)
17	Variable monthly charge revenue		
18	Residential	55.0	55.6
19	Multi-residential:	21.7	21.8
20	Commercial, including large wholesale	22.0	21.9
21	Variable monthly charge revenue	98.7	99.3
22	Sanitary Utility regulated revenue	143.6	144.7
23	Stormwater Utility		
24	Residential	49.2	49.5
25	Multi-residential	5.2	5.6
26	Commercial	38.4	38.8
27	Stormwater Utility regulated revenue	92.8	93.9
28	Drainage Services regulated revenue	236.4	238.6
29	Other revenue ("revenue offsets")	6.3	5.3
30	Drainage Services Revenue	242.7	243.9

2.3.3 Operating Expenses by Function

Table 2.3.3-1 provides a comparison of Drainage Service's 2022 actual operating expenses to the PBR forecast:

Table 2.3.3-1
Drainage Services
Operating Expenses by Function
(\$ millions)

	(# 1111110110)	Δ.	_
		Α	В
		2022	
		PBR	
	Function	Forecast	Actual
1	Drainage planning and operations		
2	Operations		
3	Pipeline maintenance	18.7	16.4
4	Flow control facilities	11.7	9.8
5	Monitoring and compliance	6.2	9.4
6	Stormwater Integrated Resource Plan	4.3	3.8
7	Corrosion and Odour Reduction	3.3	4.6
8	General maintenance and other	6.5	5.4
9	Operations	50.7	49.5
10	One Water planning and project support		
11	One Water planning	6.8	5.7
12	Project support	10.1	9.5
13	One Water planning and project support	16.9	15.2
14	Operational support services	0.4	4.2
15	Drainage planning and operations	68.0	69.0
16	Billing, meters and customer service	7.7	8.7
17	EWSI Shared Services	18.6	18.6
18	Corporate shared services	16.3	19.0
19	Franchise fees and property taxes	11.8	12.5
20	Total operating expenses	122.4	127.7

Total operating expenses for 2022 were \$5.3 million greater than forecast. Key factors contributing to this variance include:

- Pipeline maintenance, Flow control facilities, and Monitoring and compliance \$1.0 million lower than forecast primarily due to a reorganization within Drainage Services resulting in the transfer of staff between Pipeline maintenance, Flow control facilities and Monitoring and compliance functions, resulting in variances within these functions without materially impacting the work completed in these functions. The remainder of the variance results from numerous small items such as lower spending on contractors, chemicals, and materials, none of which were individually significant.
- General maintenance and other \$1.1 million lower than forecast primarily due to lower biosolids management costs paid to Water Services, as a result of lower biosolids handling during the first three months of the year.

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- Stormwater Integrated Resource Plan (SIRP) \$0.5 million lower than forecast primarily due to lower participation in the home backwater valve subsidy program than anticipated. Participation in the program was lower than anticipated as a higher proportion of homes inspected through the program already had backwater valves installed.
- Corrosion and Odour Reduction (CORe) \$1.3 million greater than forecast primarily due
 to higher than anticipated costs for trunk cleaning and inspections due to the amount of solids
 found within the trunk network once access to the network through new manholes was
 obtained. This was partially offset by lower chemicals and material costs due to a
 reassessment of pump station chemical treatment capital projects indicating that pumping
 optimization being more effective for some of the locations.
- One Water planning \$1.1 million lower than forecast due to higher transfers of staff costs and employee benefits into Operations for SIRP and CORe areas of \$0.7 million and lower than anticipated contractor costs of \$0.4 million, due to increasing the use of internal resources for strategic planning studies versus external consultants.
- Project support \$0.6 million lower than forecast primarily due to lower staff costs and employee benefits resulting from the timing of staff vacancies.
- Operational support services \$3.8 million greater than forecast primarily due to higher facility lease and utility costs incurred during the year because of the delayed move and consolidation of resources at EWSI's new Water/Drainage Shared Facility (Aurum facility), which was initially anticipated to be completed in 2021.
- Billing, meters and customer services \$1.0 million greater than forecast due to higher customer growth resulting in higher meter reading charges and fees for customer service, billing and collections service provided by EPCOR's billing arm (EPCOR Energy Alberta GP Inc.)
- Corporate Shared Services \$2.7 million greater than forecast primarily due to higher salary costs incurred by the Corporate groups providing support to the business unit as a result of wage inflation.
- Franchise Fees and Property Taxes \$0.7 million greater than forecast. Franchise fees are calculated as 8% of eligible revenue less the municipal portion of property taxes. As noted in Section 2.3.2 above, Drainage Services revenues were higher than forecast, resulting in higher franchise fees paid to the City of Edmonton in 2022.

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2.3.4 Operating Expenses by Cost Category

Table 2.3.4-1 below provides a breakdown of operating expenses by cost category for rows 15, 16 and 17 from Table 2.3.3-1

Table 2.3.4-1
Drainage Services
Operating Expenses by Cost Category
(\$ millions)

		А	В
		202	22
		PBR	
	Cost Category	Forecast	Actual
1	Drainage Services planning and operations		
2	Staff costs and employee benefits	48.6	45.4
3	Contractors and consultants	13.4	16.5
4	Materials and supplies	6.3	5.6
5	Vehicles	(5.7)	(4.5)
6	Other	3.5	5.4
7	EWSI shared services allocation	1.8	0.5
8	Drainage Services planning and operations	68.0	69.0
9	Billing, meters and customer service		
10	Customer billing and collection services	4.9	6.6
11	Meter services	2.8	2.1
12	Billing, meters and customer service	7.7	8.7
13	EWSI Shared Services		
14	Staff costs and employee benefits	9.0	10.8
15	Contractors and consultants	2.5	0.8
16	Materials and supplies	1.0	0.9
17	EWSI shared services allocation	1.7	1.3
18	Other	4.5	4.8
19	EWSI Shared Services	18.6	18.6

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2.3.5 Capital Expenditures by Major Project and Category

Table 2.3.5-1 provides a comparison of forecast to actual capital expenditures for 2022 and PBR forecast to EWSI's current projection for each project or program with capital expenditures in excess of \$10.0 million over the 2022-2024 term.

Table 2.3.5-1
Drainage Services
Capital Expenditures and Contributions
(\$ millions)

		Α	В	С	D	Е	F	
	Major Category and Projects		2022			2022-2024		
		PBR Forecast	Actual	Variance	PBR Forecast	Projection	Variance	
1	Drainage Neighbourhood Renewal Program	28.0	22.2	5.7	76.5	52.8	23.7	1
2	Drainage System Expansion							
3	Private Development Construction Coordination	4.0	4.6	(0.6)	11.6	13.6	(2.0)	
4	Service Connections Program	6.6	9.3	(2.7)	18.5	25.6	(7.0)	
5	Projects < \$10 million	7.7	10.2	(2.6)	27.5	31.1	(3.6)	
6	Sub-total	18.3	24.1	(5.9)	57.6	70.3	(12.7)	2
7	Drainage System Rehabilitation							
8	Proactive Service Renewal	-	0.0	(0.0)	10.3	8.0	2.3	
9	Drill Drop Manholes Program	4.5	9.0	(4.5)	13.1	22.0	(8.9)	
10	Pump Station Rehabilitation Program	5.0	2.7	2.3	15.5	18.5	(3.0)	
11	Fleet & Vehicles Program	3.7	2.5	1.1	13.2	9.7	3.5	
12	Small Trunk Rehabilitation Program	0.1	2.0	(1.9)	18.8	16.0	2.8	
13	High Priority Replacement Program	17.0	24.0	(7.0)	52.1	57.8	(5.7)	
14	Outfall Rehabilitation	3.2	1.8	1.4	8.2	18.2	(10.0)	3
15	Local Sewer Rehabilitation	2.0	3.4	(1.5)	5.4	10.7	(5.4)	
16	Arterial Roadway	3.3	3.1	0.2	8.6	10.7	(2.0)	
17	Projects < \$10 million	11.7	6.9	4.8	20.8	29.6	(8.8)	
18	Sub-total	50.5	55.6	(5.0)	166.0	201.3	(35.3)	
19	Flood Mitigation							
20	Dry Pond Program	13.8	18.2	(4.4)	46.3	25.4	20.9	4
21	Projects < \$10 million	1.4	0.9	0.5	1.4	1.0	0.4	
22	Sub-total	15.2	19.1	(3.9)	47.7	26.4	21.3	
23	Real Estate	-	22.1	(22.1)	-	25.2	(25.2)	5

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Major Category and Projects PBR Forecast Post Projection Past Projection Projection Past Projection Projecti			Α	В	С	D	Е	F	
Forecast		Major Category and Projects		2022			2022-2024		
25				Actual	Variance		Projection	Variance	
26		Stormwater Integrated Resource Plan							
27 Proactive Manhole Relining Program 6.1 5.7 0.4 18.7 15.6 3.2 28 Proactive Pipe Relining Program 7.5 2.9 4.6 22.9 19.8 3.1 30 Sub-total 67.9 38.9 29.1 233.3 188.1 45.3 31 Sanitary Servicing Strategy Fund 2 2 25.5 5.8 1.7 (5.9) 32 SW5 7.5 - 7.5 32.8 - 32.8 8 33 Projects <\$10 million				5.5					6
28									
29			6.1	5.7	0.4	18.7	15.6	3.2	
Sub-total G7.9 38.9 29.1 233.3 188.1 45.3 31 Sanitary Servicing Strategy Fund 32 SW5 7.5 - 7.5 32.8 - 32.8 32 SW5 7.5 - 7.5 32.8 - 32.8 33 Projects < \$10 million 5.4 7.9 (2.5) 5.8 11.7 (5.9) 34 38.6 11.7 26.9 35 Corrosion and Odour Reduction (CORe) 36 Large Trunk Renewal Program 21.0 15.3 5.7 79.0 81.2 (2.2) 37 CORe Duggan Tunnel Project 11.7 21.1 9.6 56.3 63.7 (7.4) 38 CORe Drop Structure Modification Program 6.1 5.6 0.5 22.0 20.9 1.1 39 CORe Access Manhole Program 6.2 7.2 (1.0) 17.9 22.4 (4.5) 4.9 70.9 4.9 1.0 1.8 3.6 (1.8) 5.3 7.0 (1.7) 41 Sub-total 46.8 33.9 12.9 180.4 195.1 (14.7) 9 42 LRT Relocates Program 21.8 34.9 (13.1) 48.5 58.9 (10.3) 43 Developer and City-contributed 127.6 102.0 25.6 382.7 328.6 54.1 11 44 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 45 Contributions 46 Drainage System Expansion 6.6 (5.1) (1.5) (1.5) (18.5) (18.8) 0.2 (1.5) (28	Proactive Pipe Relining Program	7.5	2.9	4.6	22.9	19.8	3.1	
Sanitary Servicing Strategy Fund SW5	29	Projects < \$10 million	21.9	14.0	7.9	57.2	40.3	16.8	7
32 SW5	30	Sub-total	67.9	38.9	29.1	233.3	188.1	45.3	
33 Projects < \$10 million Sub-total 12.9 7.9 (2.5) 5.8 11.7 (5.9) 34 Sub-total 12.9 7.9 4.9 38.6 11.7 26.9 35 Corrosion and Odour Reduction (CORe) 36 Large Trunk Renewal Program 21.0 15.3 5.7 79.0 81.2 (2.2) 37 CORe Duggan Tunnel Project 11.7 2.1 9.6 56.3 63.7 (7.4) 38 CORe Duggan Tunnel Project 11.7 2.1 9.6 56.3 63.7 (7.4) 38 CORe Drop Structure Modification Program 6.1 5.6 0.5 22.0 20.9 1.1 39 CORe Access Manhole Program 6.2 7.2 (1.0) 17.9 22.4 (4.5) 4.0 Projects < \$10 million 1.8 3.6 (1.8) 5.3 7.0 (1.7) 41 Large Projects < \$10 million 1.8 3.9 12.9 180.4 195.1 (14.7) 9 42 LRT Relocates Program 21.8 34.9 (13.1) 48.5 58.9 (10.3) 43 Developer and City-contributed 127.6 102.0 25.6 382.7 328.6 54.1 14 42 24 44 24 24 24 2		Sanitary Servicing Strategy Fund							
34		SW5	7.5	-	7.5	32.8	-	32.8	8
35	33	Projects < \$10 million	5.4	7.9	(2.5)	5.8	11.7	(5.9)	
36	34	Sub-total	12.9	7.9	4.9	38.6	11.7	26.9	
37 CORe Duggan Tunnel Project 11.7 2.1 9.6 56.3 63.7 (7.4) 38 CORe Drop Structure Modification Program 6.1 5.6 0.5 22.0 20.9 1.1 39 CORe Access Manhole Program 6.2 7.2 (1.0) 17.9 22.4 (4.5) 40 Projects < \$10 million 1.8 3.6 (1.8) 5.3 7.0 (1.7) 41 Sub-total 46.8 33.9 12.9 180.4 195.1 (14.7) 9 42 LRT Relocates Program 21.8 34.9 (13.1) 48.5 58.9 (10.3) 10 43 Developer and City-contributed 127.6 102.0 25.6 382.7 328.6 54.1 11 44 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 11 45 Contributions 46 Drainage System Expansion 47 Service Connections Program (6.6) (5.1) (1.5) (18.5) (18.8) 0.2 48 Private Development Construction Coordination (0.3) (0.3) (0.0) (0.3) (1.0) 0.7 Program 49 Projects < \$10 million - 0.1 (0.1) - 0.1 (0.1) 50 Sub-total (6.9) (5.3) (1.6) (18.8) (19.7) 0.9 51 Flood Mitigation 52 Dry Pond Program (4.5) (5.8) 1.3 (13.6) (6.6) (7.0) 4 55 Projects < \$10 million (3.1) (0.5) (2.6) (6.7) (1.8) (4.9) 7 56 Sanitary Servicing Strategy Fund 58 SW5 (7.5) - (7.5) (32.8) - (32.8) 8 10 Corrections Correctio	35	Corrosion and Odour Reduction (CORe)							
37	36	Large Trunk Renewal Program	21.0	15.3	5.7	79.0	81.2	(2.2)	
38	37	CORe Duggan Tunnel Project	11.7	2.1	9.6	56.3	63.7		
39	38		6.1	5.6	0.5	22.0	20.9	`1.1 [′]	
40	39		6.2	7.2		17.9	22.4	(4.5)	
Sub-total 46.8 33.9 12.9 180.4 195.1 (14.7) 9 42 LRT Relocates Program 21.8 34.9 (13.1) 48.5 58.9 (10.3) 10 43 Developer and City-contributed 127.6 102.0 25.6 382.7 328.6 54.1 11 44 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1	40		1.8	3.6		5.3	7.0	(1.7)	
11 12 12 13 14 14 15 15 16 10 10 10 15 10 10 10 10	41		46.8	33.9	12.9	180.4	195.1	(14.7)	9
127.6 102.0 25.6 382.7 328.6 54.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 14 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 32.6 24 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 38.9 360.8 382.7 382.6 48.9 4	42	LRT Relocates Program	21.8	34.9	(13.1)	48.5	58.9	(10.3)	10
44 Capital Expenditures 388.9 360.8 28.1 1,231.4 1,158.3 73.1 45 Contributions 46 Drainage System Expansion 66.6 (5.1) (1.5) (18.5) (18.8) 0.2 48 Private Development Construction Coordination Program (0.3) (0.3) (0.0) (0.3) (1.0) 0.7 49 Projects < \$10 million	43		127.6			382.7	328.6		11
46 Drainage System Expansion (6.6) (5.1) (1.5) (18.5) (18.8) 0.2 48 Private Development Construction Coordination Program (0.3) (0.3) (0.0) (0.3) (1.0) 0.7 49 Projects < \$10 million	44		388.9	360.8	28.1	1,231.4	1,158.3	73.1	
47 Service Connections Program (6.6) (5.1) (1.5) (18.5) (18.8) 0.2 48 Private Development Construction Coordination (0.3) (0.3) (0.0) (0.3) (1.0) 0.7 Program 49 Projects < \$10 million	45	Contributions							
47 Service Connections Program (6.6) (5.1) (1.5) (18.5) (18.8) 0.2 48 Private Development Construction Coordination (0.3) (0.3) (0.0) (0.3) (1.0) 0.7 Program 49 Projects < \$10 million	46	Drainage System Expansion							
Program 49 Projects < \$10 million - 0.1 (0.1) - 0.1 (0.1) 50 Sub-total (6.9) (5.3) (1.6) (18.8) (19.7) 0.9 51 Flood Mitigation 52 Dry Pond Program (4.5) (5.8) 1.3 (13.6) (6.6) (7.0) 4 53 Stormwater Integrated Resource Plan (8.8) (1.7) (7.1) (21.0) (16.5) (4.6) 6 54 Dry Pond Program (8.8) (1.7) (7.1) (21.0) (16.5) (4.6) 6 55 Projects < \$10 million	47	Service Connections Program	(6.6)	(5.1)	(1.5)	(18.5)	(18.8)	0.2	
49 Projects < \$10 million - 0.1 (0.1) - 0.1 (0.1) 50 Sub-total (6.9) (5.3) (1.6) (18.8) (19.7) 0.9 51 Flood Mitigation Flood Mitigation (4.5) (5.8) 1.3 (13.6) (6.6) (7.0) 4 53 Stormwater Integrated Resource Plan (8.8) (1.7) (7.1) (21.0) (16.5) (4.6) 6 54 Dry Pond Program (8.8) (1.7) (7.1) (21.0) (16.5) (4.6) 6 55 Projects < \$10 million	48	Private Development Construction Coordination	(0.3)	(0.3)	(0.0)	(0.3)	(1.0)	0.7	
50 Sub-total (6.9) (5.3) (1.6) (18.8) (19.7) 0.9 51 Flood Mitigation (4.5) (5.8) 1.3 (13.6) (6.6) (7.0) 4 52 Dry Pond Program (8.8) (1.7) (7.1) (21.0) (16.5) (4.6) 6 54 Dry Pond Program (8.8) (1.7) (7.1) (21.0) (16.5) (4.6) 6 55 Projects < \$10 million		Program	, ,		, ,	, ,	, ,		
51 Flood Mitigation (4.5) (5.8) 1.3 (13.6) (6.6) (7.0) 4 52 Dry Pond Program (8.8) (1.7) (7.1) (21.0) (16.5) (4.6) 6 54 Dry Pond Program (8.8) (1.7) (7.1) (21.0) (16.5) (4.6) 6 55 Projects < \$10 million		Projects < \$10 million	-	0.1	(0.1)	-	0.1	(0.1)	
52 Dry Pond Program (4.5) (5.8) 1.3 (13.6) (6.6) (7.0) 4 53 Stormwater Integrated Resource Plan (8.8) (1.7) (7.1) (21.0) (16.5) (4.6) 6 54 Dry Pond Program (8.8) (1.7) (7.1) (21.0) (16.5) (4.6) 6 55 Projects < \$10 million			(6.9)	(5.3)	(1.6)	(18.8)	(19.7)	0.9	
53 Stormwater Integrated Resource Plan (8.8) (1.7) (7.1) (21.0) (16.5) (4.6) 6 54 Dry Pond Program (3.1) (0.5) (2.6) (6.7) (1.8) (4.9) 7 55 Projects < \$10 million		Flood Mitigation							
54 Dry Pond Program (8.8) (1.7) (7.1) (21.0) (16.5) (4.6) 6 55 Projects < \$10 million			(4.5)	(5.8)	1.3	(13.6)	(6.6)	(7.0)	4
55 Projects < \$10 million (3.1) (0.5) (2.6) (6.7) (1.8) (4.9) 7 56 Sub-total (11.9) (2.2) (9.7) (27.8) (18.3) (9.5) 57 Sanitary Servicing Strategy Fund (7.5) - (7.5) - (32.8) - (32.8) 8	53	Stormwater Integrated Resource Plan							
55 Projects < \$10 million (3.1) (0.5) (2.6) (6.7) (1.8) (4.9) 7 56 Sub-total (11.9) (2.2) (9.7) (27.8) (18.3) (9.5) 57 Sanitary Servicing Strategy Fund (7.5) - (7.5) (32.8) - (32.8) 8					(7.1)			(4.6)	6
56 Sub-total (11.9) (2.2) (9.7) (27.8) (18.3) (9.5) 57 Sanitary Servicing Strategy Fund (7.5) - (7.5) - (32.8) - (32.8) 8	55		(3.1)	(0.5)	(2.6)	(6.7)	(1.8)	(4.9)	7
57 Sanitary Servicing Strategy Fund 58 SW5 (7.5) - (7.5) - (32.8) - (32.8) 8	56		(11.9)	(2.2)	(9.7)	(27.8)	(18.3)	(9.5)	
58 SW5 - (7.5) - (7.5) 32.8) - (32.8) 8	57					. ,			
	58		(7.5)	-	(7.5)	(32.8)	-	(32.8)	8
100 110,000 4,0111111011	59	Projects < \$10 million	(3.9)	(6.4)	` 2.Ś	`(1.3)	(8.3)	` 7.Ó	

Attachment 1
EPCOR Water Services Inc.
2022 PBR Progress Report

		Α	В	С	D	E	F	
	Major Category and Projects		2022			2022-2024		
		PBR Forecast	Actual	Variance	PBR Forecast	Projection	Variance	
60	Sub-total	(11.4)	(6.4)	(5.0)	(34.1)	(8.3)	(25.8)	
61		(127.6)		(25.6)	(382.7)	(328.6)	(54.1)	11
	Developer and City-contributed		(102.0)					
62	Contributions	(162.2)	(121.7)	(40.5)	(477.0)	(381.4)	(95.6)	
63	Capital Expenditures, net of Contributions	226.7	239.1	(12.4)	754.3	776.8	(22.5)	

EPCOR Water Services Inc.

In 2022, capital expenditures, net of contributions were \$12.4 million greater than forecast. Since weather-related delays, scope and design changes, supply chain disruptions and other factors can affect capital expenditures in any single year of the PBR term, capital expenditures are more appropriately assessed over the entire 2022-2024 PBR term. Over the 2022-2024 PBR term, capital expenditures are currently projected to be \$22.5 million higher than the PBR forecast. Explanations for projects and programs with projected costs that are \$10.0 million greater or lower than the PBR forecast are provided below:

- 1. **Drainage neighbourhood renewal -** \$23.7 million lower than PBR forecast due to the need to focus resources on emergency drainage system rehabilitation projects and the ability to defer some renewal work into the future.
- 2. **Drainage system expansion program** \$12.7 million greater than PBR forecast primarily due to a higher volume of service connection applications than forecast.
- 3. Outfall rehabilitation \$10.0 million greater than PBR forecast, as a result of new projects identified to manage the increased damage to outfalls during the 2021 spring river breakup season. This outcome reflects an updated risk ranking approach that prioritizes outfall remediation work, revised design requirements, and higher construction costs due to carryover of projects previously forecast to be completed in 2021.
- 4. Dry pond program \$20.9 million lower than forecast due to both lower than expected bids from contractors and efficiencies in project delivery for the Malcolm Tweddle dry pond. These savings are partially offset by a \$7.0 million decrease in grants and contributions.
- 5. **Real estate (Water/Drainage Shared Facility)** \$25.2 million greater than forecast, as a result of construction delays driven by scope and design changes to address higher than expected construction bid costs.
- 6. **SIRP dry pond program -** \$24.1 million lower than forecast. Longer-than-anticipated timeframes for land assembly involving the City of Edmonton, and school boards and public consultation are expected to push expenditures in dry ponds into future PBR terms. Lower capital spending in the 2022-2024 PBR term is partially offset by a \$4.6 million decrease in contributions from grants.
- 7. SIRP projects < \$10 million \$16.8 million lower than forecast, primarily due to design delays for the Outfall and Automatic Gates Program, which are projected to push expenditures into future PBR terms, as well as lower-than-anticipated public uptake on the Home Flooding program. Lower capital spending in the 2022-2024 PBR term is partially offset by a \$4.9 million decrease in contributions from grants that align with the construction expenditure.</p>

EPCOR Water Services Inc.

- 8. Sanitary Servicing Strategy Fund (SSSF) SW5 \$32.8 million lower than forecast. This fully contributed project has been cancelled in response to updated capacity and demand forecasts showing that the existing infrastructure is sufficient to meet anticipated customer demand in southwest Edmonton.
- 9. **Corrosion and Odour Reduction (CORe) program -** \$14.7 million greater than forecast primarily due to advancing the Duggan Tunnel project in the current PBR term, a new project to rehabilitate deteriorated trunk sections related to the NL2 Large Trunk in North Edmonton and unexpected poor ground conditions at Access Manhole Program locations requiring scope and construction methodology changes, resulting in cost increases.
- 10.LRT Relocates Program \$10.3 million greater than forecast. The PBR forecast was approved before the final approval and funding for the Metro/Capital Line LRT was secured. The City's approved track alignments require EWSI to complete more infrastructure relocations than anticipated in the PBR forecast.
- 11. Developer and City contributed assets \$54.1 million lower than forecast. These reflect drainage infrastructure completed by private developers and the City and transferred to EWSI on substantial completion of the development, the timing of which can vary due to individual development schedules. EWSI's current projections show a significant decrease in the value of these fully contributed assets than was anticipated in the 2022-2024 PBR forecast.

2.3.6 Construction Work in Progress

Drainage Services' rate base consists of plant in service. If a capital project is not completed (i.e., not placed into service) during the year, the capital expenditures on that project remain in Construction Work in Progress and are excluded from the rate base. Because of the long timeframes required to complete large, complex projects, Drainage Services has larger balances of Construction Work in Progress than Water or Wastewater. Drainage Services' 2022 construction work in progress is summarized in Table 2.3.6-1 below:

EPCOR Water Services Inc.

Table 2.3.6-1
Drainage Services
Construction Work in Progress
(\$ millions)

		Α	В
		20	22
		PBR	
		Forecast	Actual
1	Construction work in progress, beginning of year	68.0	127.3
2	Capital expenditures		
3	Capital expenditures before contributions	388.9	360.8
4	Contributions received	(162.2)	(121.7)
5	Sub-total	226.7	239.1
6	Capital additions		
7	Sanitary Utility	(150.1)	(159.2)
8	Stormwater Utility	(148.3)	(210.0)
9	Combined Sewer	(23.4)	(46.2)
10	SIRP	(82.9)	(43.1)
11	CORe	(27.3)	(17.9)
12	Sub-total Sub-total	(432.0)	(476.4)
13	Contributions recognized		
14	Sanitary	87.1	123.8
15	Stormwater	86.7	146.0
16	Combined	7.7	(76.0)
17	SIRP	9.5	2.1
18	Sub-total	191.0	196.0
19	Construction work in progress, end of year	53.6	85.9

The 2022-2024 PBR Plan allows Drainage to capitalize the costs of financing certain projects remaining in Construction Work in Progress, using AFUDC. In 2022, AFUDC included in capital expenditures on eligible projects amounted to \$8.2 million.

2.3.7 Depreciation and Amortization

Depreciation expense and amortization of contributions are shown in Table 2.3.7-1 below:

Table 2.3.7-1
Drainage Services
Depreciation and Amortization
(\$ millions)

		Α	В
		20:	22
	Depreciation and Amortization	PBR	
		Forecast	Actual
1	Provision for depreciation	88.3	86.3
2	Amortization of contributions	(46.3)	(46.6)
3	Depreciation, net of amortization of contributions	42.0	39.7

Drainage's net depreciation expense was \$2.3 million lower than the PBR forecast. This difference is consistent with lower than forecast opening balances of plant in service and contributions.

EPCOR Water Services Inc.

2.3.8 Rate Base

Drainage's mid-year rate base, shown in Table 2.3.8-1 below was \$41.3 million lower than forecast due to lower opening balances of plant in service and contributions, largely due to the carry-over projects which remained under construction work in progress. The mid-year rate base has been allocated between the sanitary utility excluding CORe, CORe capital, the stormwater utility excluding SIRP and SIRP capital.

Table 2.3.8-1
Drainage Services
Mid-Year Rate Base
(\$ millions)

	А	В
	20)22
	PBR	
Description	Forecast	Actual
1 Plant in Service, beginning of year	5,752.7	5,637.4
2 Capital additions	432.0	476.4
3 Retirements and adjustments	(16.0)	(20.4)
4 Plant in Service, end of year	6,168.8	6,093.4
5 Accumulated depreciation, beginning of year	1,109.9	1,099.2
6 Gross Provision	88.9	86.6
7 Retirements and adjustments	(16.0)	(10.5)
8 Accumulated depreciation, end of year	1,182.8	1,175.2
9 Mid-Year Net Property	4,814.4	4,728.2
10 Other Rate Base Items		
11 Materials and Supplies	1.3	2.0
12 Working Capital	13.9	13.6
13 Gross Mid-Year Rate Base	4,829.6	4,743.8
14 Contributions, beginning of year	(3,625.6)	(3,592.3)
15 Additions	(191.0)	(196.0)
16 Contributions, end of years	(3,816.6)	(3,788.3)
17 Accumulated amortization, beginning of year	621.9	624.0
18 Gross Provision	46.3	46.7
19 Accumulated amortization, end of year	668.2	670.7
20 Mid-Year Net Contributions	(3,076.0)	(3,042.9)
21 Adjustment to SIRP Rate Base ³	(20.3)	(8.8)
22 Mid-Year Rate Base	1,733.3	1,692.0
23 Allocated to:		
24 Sanitary Utility	798.2	777.1
25 Stormwater Utility	772.1	827.2
26 SIRP	60.9	26.5
27 CORe	102.1	61.2
28 Mid-Year Rate Base	1,733.3	1,692.0

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³ The costs of pre-SIRP flood mitigation plant in service were embedded in pre-2022 rates. Therefore, depreciation and returns on SIRP assets are only included in Drainage's rate base starting April 1, 2022, the date when the new PBR rates came into effect.

2.3.9 Return on Rate Base

Table 2.3.9-1 provides a comparison of Drainage's PBR forecast and actual returns on rate base for 2022. Returns are calculated separately for the debt-financed and equity-financed portions of Drainage's net rate base with returns on the debt-financed portion made at Drainage's average cost of debt and returns on the equity-financed portion made at the rates of return on equity awarded for the 2022-2024 PBR term.

Table 2.3.9-1
Drainage Services
Return on Mid-Year Rate Base
(\$ millions)

		Α	В
		20:	22
		PBR	
	Description	Forecast	Actual
1	Drainage Services mid-year rate base	1,733.3	1,692.0
2	Deemed capital structure		
3	Debt	60.00%	60.00%
4	Equity	40.00%	40.00%
5	Cost rates		
6	Debt	3.32%	3.41%
7	Equity	6.31%	6.18%
8	Return on rate base		
9	Debt	34.5	34.7
10	Equity	43.8	41.8
11	Total return on mid-year rate base	78.3	76.5

Return on rate base is calculated separately for the debt-financed and equity-financed portions of Drainage Services net rate base. The rate of return on debt is equal to the embedded cost of debt for EWSI's total water system, as calculated in Table 2.1.9-2 below:

Table 2.3.9-2
Drainage Services
Interest Expense and Cost of Debt
(\$ millions)

		Α	В
		20	22
		PBR	
		Forecast	Actual
1	Interest expense		
2	Interest on long-term debt	35.4	35.1
3	Interest on short term debt	0.9	1.1
4	Interest expense	36.3	36.1
5	Mid-year debt		
6	Mid-year long-term debt	1,055.7	1,050.7
7	Mid-year short-term debt	36.9	7.8
8	Mid-year debt	1,092.6	1,058.5
9	Embedded Cost of Debt	3.32%	3.41%

EPCOR Water Services Inc.

Table 2.3.9-2 shows that the average cost of debt was slightly higher than forecast due to higher than forecast interest rates on new debt issues related to the Bank of Canada's rate hikes during 2022. Under the terms of the PBR Plan, EWSI bears interest rate risk and higher debt costs are not borne by ratepayers. EWSI expects interest rates to remain higher than forecast for the remainder of the PBR term.

Prior to 2022, Drainage Services earned a rate of return on equity that was significantly lower than a rate of return that would be considered fair for a utility requiring financing through external capital markets. In the 2022-2024 PBR Application, EWSI recognized that an immediate move to a fair rate of return would create financial hardship for many customers and proposed that the rate of return on equity for sanitary (excluding CORe) and stormwater (excluding SIRP) be reduced from the fair rate of return of 9.95% to 5.50% for 2022 and "ramped up" in a linear fashion by 1.1% per year to achieve a fair return of 9.95% by 2026. Because of their unique nature, SIRP and CORe were recognized as requiring a fair rate of return commencing in 2022 and were awarded a rate of return on equity of 9.95% for the entire 2022-2024 PBR term. In 2022, EWSI forecast a combined rate of return on equity of 6.31%. The actual rate of return on equity was slightly lower, primarily due to higher than forecast operating expenses, partially offset by lower than forecast depreciation and amortization.

2.3.10 Transactions with Affiliates

Drainage Services derives a portion of its revenue and expenses from transactions with affiliates, including the City of Edmonton, EUI and its subsidiaries. Table 2.3.10-1 provides a summary of Drainage Services' 2022 forecast and actual transactions with affiliates.

Attachment 1 2022 PBR Progress Report

Table 2.3.10-1 Drainage Services Transactions with Affiliates (\$ millions)

		Α	В
		20	22
		PBR	
	Affiliate and Service	Forecast	Actual
1	Revenues from the provision of services to the City of Edmonton		
2	Utility Revenue	3.6	3.9
3	Other Services	0.1	0.0
4	Total	3.7	3.9
5	Services provided by (recovered from):		
6	City of Edmonton		
7	Franchise Fees	10.2	11.1
8	Property Taxes	1.6	1.4
9	Other Services	0.2	4.1
10	Total	12.0	16.6
11	EPCOR Utilities Inc.		
12	Corporate Shared Service Costs	16.3	19.0
13	Interest on Intercompany Loans	35.4	35.1
14	Interest on Short-term debt	0.9	1.1
15	Other services	3.9	3.7
16	Total	56.8	58.8
17	Other Affiliate		
18	EPCOR Technologies Inc.	(0.2)	3.1
19	EPCOR Commercial Services Inc.	0.3	(0.1)
20	EPCOR Water Services	1.7	1.7
21	EPCOR Distribution and Transmission Inc.	0.1	(0.1)
22	EPCOR Energy Services	4.2	4.9
23	Total	6.1	9.6
24	Expenditures on capital projects arising from services provided by:		
25	City of Edmonton	(18.6)	3.1
26	EPCOR Technologies Inc.	3.3	5.5
27	EPCOR Utilities Inc.	0.3	1.0
28	EPCOR Water Services	(2.1)	(2.3)
29	EPCOR Distribution and Transmission Inc.	-	0.1
30	Total	(17.1)	7.4

3 Operational Performance

3.1 Water Services

Table 3.1-1 summarizes the 2022 operational performance for Water Services:

Table 3.1-1
Water Services 2022 Operational Performance

			Perfor	mance			Maximum	Total
	Index and Performance Measure	Benchmark	Target	Actual	Base Points	Points Earned	Bonus Points	Points Earned
1.0	Water Quality Index	Non-suspect test results	99.7%	99.8%	30.0	30.0	-	30.00
2.0	Customer Service Index		0011 70	00.070	00.0	55.5		00.00
2.1	Post Service Audit Factor	% satisfied	75.0%	90.1%		4.5		
2.2	Home Sniffing Factor	% satisfaction	94.4%	92.9%		3.7		
2.3	Response Time Factor	min to confirm breaks	25	14.8		5.3		
2.4	Planned Construction Impact Factor	% compliance	95.8%	100.0%		3.9		
2.0	Customer Service Index				15.0	17.4	2.25	17.25
3.0	System Reliability & Optimization Index							
3.1	Water Main Break Factor	# of breaks	365	278		7.7		
3.2	Repair Duration Factor	% fixed within 24 hrs	95.4%	97.3%		6.4		
3.3	Water Loss Factor	leakage index (ILI)	1.23	0.87		8.1		
3.4	System Energy Efficiency Factor	kWh /ML treated	281.0	245.8		7.1		
3.0	System Reliability & Optimization Index				25.0	29.3	3.25	28.25
4.0	Environmental Index							
4.1	Water Conservation (Residential) Factor	m³/month/household	16.8	14.8		5.7		
4.2	Environmental Incident Management Factor	# of incidents	5	2		12.5		
4.3	Solids Residual Management Factor	# days	120	150.8		6.3		
4.0	Environmental Index				15.0	24.4	2.25	17.25
5.0	Safety Index							
5.1	Near Miss Reporting Factor	# completed	550	837		5.7		
5.2	Work Site Inspections/Observations Factor	# conducted	1,032	3,492		12.7		
5.3	Lost Time Frequency Rate	frequency rate	0.40	0.21		7.3		
5.4	All Injury Frequency Rate	frequency rate	1.00	0.21		18.2		
5.0	Safety Index				15.0	43.8	2.25	17.25
	Aggregate Points Earned (sum of all the above in	ndices)			100.0	145.0	10.00	110.0
	Points Required at Performance Standard							100.0
	Points Above / (Below) Performance Standard							10.0

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Water Services quality is measured by the results of five indices shown in Table 3.1-1 above. Performance under each index is measured independently on a point basis with 100 base points available if the standards in all five areas are achieved. In total, up to 10 additional bonus points for performance above the standard are available. In 2022, Water Services exceeded performance standards for each index and earned maximum bonus points. Highlights and improvement opportunities for each index are provided below:

3.1.1 Water Quality Index

The water quality index measures the overall quality of water that is delivered to the customer and provides reassurance that water quality consistently meets or exceeds the federal and provincial water quality standards. This index consists of a single performance measure:

Water Quality Index Factor (actual 99.8% vs target 99.7%), calculated as the
percentage of water quality test results that meet EWSI's internal water standards. Both
federal and provincial government water quality standards are incorporated into EWSI's
Approval to Operate from Alberta Environment and Parks (AEP). In some cases, EWSI's
internal water standards have stricter limits for critical parameters to provide early
warnings of potential water quality problems.

In 2022, EWSI collected and tested 58,066 treated drinking water samples, including randomly selected samples from plant reservoirs, field reservoirs and the distribution network, as well as specific testing to address water quality complaints and depressurization events. All water quality test results met Health Canada's Drinking Water Quality Guidelines and AEP water quality testing requirements and only 98 samples (0.17%) did not meet EWSI's internal water quality standards.

Areas for Improvement

 In 2023, EWSI plans to review its distribution water quality sampling practices and methodology to ensure sampling achieves AEP's monthly random sampling count and distributed location requirements.

3.1.2 Customer Service Index

The customer service index is a composite measure of the customers' perception of satisfaction with EWSI's service, the aesthetic quality of water and speed of response to customer issues. This index includes the following performance measures:

Post Service Audit Factor (actual 90.1% vs target 75.0%), calculated as the percentage
of customers responding "completely" or "very satisfied" with the level of service received
from EWSI's Emergency group. In 2022, EWSI updated the post-service audit

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questionnaire to obtain greater feedback from customers regarding their experience with EWSI, so that EWSI can continue to improve customer experience.

- Home Sniffing Factor (actual 92.9% vs target 94.4%), calculated as the percentage of
 participants in the home sniffing survey responding "completely" or "very satisfied". In
 2022, home sniffing odour intensity trends were used to track customer satisfaction
 before, during, and after spring runoff, enabling water plant operators to make operational
 adjustments on a real time basis.
- Response Time Factor (actual 14.8 minutes vs target 25 minutes), calculated as the
 average number of minutes needed to confirm a water main break from the time a call is
 received at EWSI's dispatch office. Implementation of an Emergency Support Team in
 early 2022 contributed to a reduction in response times to possible main breaks.
- Planned Construction Impact Factor (actual 100.0% vs target 95.8%), means the
 percentage of the total planned construction events where EWSI complies with required
 construction notification procedures. In 2022, on-going training and improvements to
 construction coordination and communication plans resulted in performance exceeding
 the PBR standard.

Areas for Improvement

- Post Service Audit Factor: In 2023, EWSI will continue to focus on improving customer experience by examining root causes derived from customers' comments in the post service questionnaire.
- **Home Sniffing Factor:** In 2023, the Home Sniffing program will be rebranded as the Spring Home Analysis Runoff Program (SHARP) with updated guidelines for random selection of program participants, so that all areas of the city are adequately represented.
- Response Time Factor: Response times greater than 25 minutes will continue to be investigated to ensure continued success.
- Planned Construction Impact Factor: Training and construction processes will continue to be reviewed to minimize impacts of planned construction activities.

3.1.3 System Reliability and Optimization Index

The System Reliability Index is a measure of the confidence that customers can place in the reliability of the waterworks system. This index includes the following performance measures:

• Water Main Break Factor (actual 278 main breaks vs target 365), calculated as the number of water main breaks that occurred in the year. Main break rates continue to

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fluctuate with variations in weather and temperature, with the overall number of main breaks continuing to decline due to the replacement of cast iron mains with PVC mains.

- Water Main Break Repair Duration Factor (actual 97.3% vs target 95.4%), calculated as the percentage of water main breaks repaired within 24 hours from the time that the flow of water is shut off, excluding main breaks on arterial or collector roads. EWSI reviewed each main break that exceeded 24 hours to identify issues and find efficiencies for future repairs.
- Water Loss Factor (actual 0.87 vs target 1.23), measured using the Infrastructure Leakage Index ("ILI"), a industry-standard performance indicator quantifying how well a water distribution system is managed for the control of "real" water losses (i.e., leakage).
- System Energy Efficiency Factor (actual 245.8 kWh/ML of water treated vs target 281 kWh/ML), calculated as the energy used at all water facilities in kWh divided by the average annual water production per residential customer account (ML/kWh/customer).

In 2022, EWSI exceeded the energy efficiency target by implementing several energy efficiency improvements including completion of an energy audit to identify improvement opportunities for water treatment plant and reservoir operations.

- Water Main Break Factor: In 2023, EWSI will utilize AI software to identify and evaluate main break patterns, enabling further refinement of risk-based asset management programs.
- Water Main Break Repair Duration Factor: In 2023, EWSI plans to implement an online
 water outage map to provide more information directly to impacted customers. Planned
 improvements to the outage map includes providing additional information such as traffic
 impacts related to main breaks, unidirectional flushing and other interruptions. All
 processes for mobilization of resources to main break site will be reviewed to further
 reduce repair duration.
- Water Loss Factor (ILI): Although the ILI exceeded the PBR standard, EWSI continues to explore opportunities for identifying and minimizing water losses.
- System Energy Efficiency Factor: Planned energy efficiency improvements include:
 - Leveraging energy audit to identify climate change mitigation strategies and integrating recommendations into future capital project plans;

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- Implementing an energy management dashboard to share near-real time solar farm generation and usage, energy efficiency indices, and other energy related data with stakeholders; and
- o Completing the solar farm and battery system operation optimization plan.

3.1.4 Environment Index

The environmental index measures the success of programs and policies designed to mitigate and report adverse environmental impacts. This index includes the following performance measures:

- Water Conservation Factor (actual 14.8 m³ vs target 16.8 m³), calculated as the average monthly consumption per residential customer. In 2022, hybrid-working arrangements and hot, dry weather during late summer months continued to impact residential consumption per customer. Ongoing improvements in water usage habits and technology, including the use of more efficient appliances and toilets contributed to the Water Conservation Factor remaining better than the standard.
- Environmental Incident Management Factor (actual 2 vs target 5), calculated as the number of incidents reportable to municipal, provincial or federal regulators that are considered preventable. In 2022, there were two reportable release events. First, a small loss of refrigerant to the atmosphere from an aging building chiller unit at the Rossdale water treatment plant and, second, a release of approximately one thousand cubic meters of potable water from the Rosslyn reservoir to the stormwater management system and into the North Saskatchewan River due to a partially open value after a regular maintenance activity at the reservoir. Following this release, reservoir fill procedures were reviewed and additional controls were implemented.
- Solids Residual Management Factor (actual 150.8 vs target 120), calculated as the
 number of days that the water treatment plants operate in direct filtration mode. Direct
 filtration reduces the solids load of water returned to the North Saskatchewan River during
 water treatment. In 2022, solids discharged during winter months were reduced by 50%
 relative to baseline conventional treatment.

- Water Conservation Factor: EWSI expects average monthly residential consumption to continue to decline due to changes in technology and water conservation awareness.
- Environment Incident Management Factor: Continued emphasis on improving operational controls and maintaining the environmental management systems to ISO

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14001 standard with a focus on root cause analysis and implementing effective corrective action plans.

 Solids Residual Management Factor: In 2023, EWSI will implement its new Wastestream Monitoring Program which was approved by Alberta Environment and Protected Areas in December 2022. This program will build on previous assessment work for quantifying residuals discharged to the river and their impacts, helping to inform future residual management strategies.

3.1.5 Safety Index

The safety index is a measure of the success of programs and policies that maximize the safety of employees and the public. The performance measures comprising this index include:

- Near Miss Reporting Factor (actual 837 vs target 550), calculated as the number of near miss reports completed each year. In 2022, EWSI implemented a new Mind on Task initiative to encourage personnel to focus on identifying hazards before an event occurs in order to support a proactive approach to safety.
- Work Site Inspections and Observations Factor (actual 3,492 vs target 1,032), calculated as the number of Work Site Inspections and Observations completed each year. The higher number of inspections and observations completed reflects continued focus on proactive field engagement.
- Lost Time Injury Frequency Factor (actual 0.21 vs target 0.40), calculated as the frequency of disability injuries and illnesses and the All Injury Frequency Factor (actual 0.21 vs target 1.00), calculated as the frequency of disability injuries and medical aid injuries. These factors are key measures for assessing the effectiveness of safety programs. In 2022, strategies based on causal themes were identified to reinforce reducing and/or eliminating workplace injuries.

- Near Miss Reporting Factor: Near miss and hazard identification reporting will continue to be a focus in 2023 to support EWSI's proactive approach to safety.
- Work Site Inspections / Observations Factor: In 2023, there will be a continued focus on inspections and observations to support a proactive approach to safety.
- Lost Time Frequency Rate Factor and All Injury Frequency Rate Factor: EWSI
 endeavours to eliminate workplace injuries and, to this end, will implement causal

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investigation methodology in 2023 to improve root cause identification and prevent reoccurrence of workplace injuries.

3.2 Wastewater Treatment Services

Table 3.2-1 summarizes Wastewater Treatment Services 2022 operational performance:

Table 3.2-1
Wastewater Treatment Services 2022 Operational Performance

	A	В	С	D	E	F	G	Н
			Perfor	mance	Base	Points	Maximum Bonus	Total Points
	Description	Benchmark	Standard	Actual	Points	Earned	Points	Earned
1.0	Water Quality & Environment Index							
1.1	Wastewater Quality Factor	WELP	26.0	16.7		35.1		
1.2	Environmental Incident Factor	# of incidents	5	3		37.5		
1.0	Water Quality & Environment Index				45.0	72.6	4.5	49.5
2.0	Customer Service Index							
2.1	H₂S - 1-hour Exceedance Factor	exceedance std	4	0.5		40.0		
2.2	H₂S - 24-hour Exceedance Factor	exceedance std	1	1		5.0		
2.3	Scrubber Uptime Factor	% on-line	96.0%	98.3%		5.1		
2.0	Customer Service Index				15.0	50.1	1.5	16.5
3.0	System Reliability and Optimization Index							
3.1	Enhanced Primary Treatment Factor	% in use	94.0%	100.0%		8.9		
3.2	Biosolids Inventory Reduction Factor	relative reduction	1.05	0.97		7.7		
3.3	Energy Efficiency Factor	kWh / ML treated	508	521		8.1		
3.0	System Reliability and Optimization Index				25.0	24.7	2.5	24.7
4.0	Safety Index							
4.1	Near Miss Reporting Factor	# completed	220	300		5.1		
4.2	Work Site Inspection/Observation Factor	# conducted	919	1,499		6.1		
4.3	Lost Time Frequency Rate	frequency rate	0.75	1.34		2.1		
4.4	All Injury Frequency Rate	frequency rate	1.00	2.02		1.9		
4.0	Safety Index				15.0	15.2	1.5	15.2
	Aggregate Points Earned (sum of all the ab	ove indices)			100.0	162.6	10.0	105.9
	Points Required at Performance Standard							100.0
	Points Above / (Below) Performance Standa	ard						5.9

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Wastewater Treatment Services quality is measured by the results of four indices. As with Water Services, performance under each index is measured independently on a point basis with 100 base points available if the standards in all five areas are achieved. In total, up to 10 additional bonus points for performance above the standard are available. In 2022, Wastewater exceeded performance standards for three of the four indices, earning 5.9 bonus points. Highlights and opportunities for improvement for each index are provided below:

3.2.1 Wastewater Quality and Environmental Index

The Wastewater Quality and Environmental index measures the success of operational processes and procedures designed to manage the quality of effluent returned back the North Saskatchewan River and to manage adverse environmental impacts. The performance measures comprising this index include:

- Wastewater Quality Factor (actual 16.7 vs target 26.0), determined by the Wastewater Effluent Limit Performance (WELP) index is an aggregate measure of the percentage of the discharge limits for five parameters in the Gold Bar wastewater treatment plant's final effluent. In 2022, Wastewater achieved a record low WELP. Contributing factors included the use of "winter mode" to control ammonia in the bioreactors by increasing aeration and limiting process tanks out of service.
- Environmental Incident Factor (actual 3 vs target 5), calculated as the actual number
 of environmental incidents that are both reportable and preventable. The three reportable
 incidents in 2022 included one release of biosolids supernatant and two H₂S
 exceedances. EWSI conducted root cause investigations for each incident and
 implemented corrective actions.

Areas for Improvement

- Wastewater Quality Factor: In 2023, Wastewater will continue to optimize the use of the "winter operation mode" and limit process downtime. Installation of a secondary system will be implemented to further improve the overall performance of the biological nutrient removal (BNR) process.
- Environmental Incident Factor: In 2023, EWSI will utilize additional data from the new Gold Bar Park Road Air Quality Monitoring Station to better determine sources of odours and to improve the effectiveness of ongoing odour reduction projects.

3.2.2 Customer Service Index

Wastewater's customer service index includes three equally weighted odour related factors. These factors, recognize that Wastewater's customer interactions are primarily related to

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odour concerns from customers who live near to the Gold Bar Wastewater Treatment Plant. The performance measures comprising this index include:

- H₂S 1 Hour Exceedance Factor (0.5 actual vs 4 target), measured as the number of exceedances of the 1-hour limit averaged between Gold Bar and Beverly air quality monitoring stations and H₂S 24 Hour Exceedance Factor (1 actual vs 1 target), measured as the number of exceedances of the 24-hour limit averaged between Gold Bar and Beverly air quality monitoring stations. In 2022, there were two air quality events at the Strathcona Industrial Association (SIA) air quality monitoring station at Beverly, including one 1-hr H₂S exceedance and one 24-hour H₂S exceedance. Both events took place during the planned shutdown of a scrubber for maintenance. Although investigations were not conclusive, the Gold Bar Wastewater Treatment Plant may have contributed to these exceedances, which were deemed as non-preventable.
- **Scrubber Uptime Factor** (actual 98.3% vs target 96.0%), measured as the percentage of the time that the odour control systems at the Gold Bar Wastewater Treatment Plant are operating. In 2022, preventative and corrective maintenance activities limited scrubber downtime.

Areas for Improvement

- H₂S 1-hr and 24-hr Exceedance Factors: In 2023, the newly commissioned EPCOR
 Air Quality Monitoring Station on Gold Bar Park Road will allow for intervention when high
 levels of H₂S are observed, reducing H₂S exceedances.
- **Scrubber Uptime Factor**: In 2023, construction of two additional odour scrubbers will provide additional redundancy for the EPT and West Scrubbers and tie in points for future redundancy of the Fermenter and East Scrubbers.

3.2.3 System Reliability and Optimization Index

The system reliability and optimization index is a measure of the performance of the Gold Bar Wastewater Treatment Plant. The performance measures comprising this index include:

- Enhanced Primary Treatment (EPT) Factor (actual 100% vs target 94.0%), calculated
 as the percentage of time that the EPT facility ran during wet weather events when the
 influent flow rate exceeded the EPT event threshold. Preventative maintenance, including
 inspection and cleaning of two of the four EPT clarifiers contributed to strong results in
 2022.
- Biosolids Inventory Reduction Factor (actual 0.97 vs 1.05 target). This factor
 measures the reduction in the biosolids inventory at the Clover Bar Biosolids Recycling
 Facility and is calculated as the three-year average of the total dry tonnes of biosolids

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removed from the lagoons to the total dry tonnes of biosolids deposited in the lagoons. Performance in 2022 was lower than target due to a critical power failure at the dewatering facility and due to lower than expected solids content (Total Suspended Solids or "TSS") of the biosolids deposits.

Energy Efficiency Factor (actual 521 kWh/ML vs target 508 kWh/ML), calculated as the
energy used in all wastewater facilities in kWh divided by the volume of wastewater
effluent that either receives ultraviolet (UV) treatment or is membrane plant effluent.
Lower than target energy efficiency reflected both increased energy consumption
throughout 2022, as well as lower flow volumes.

Areas for Improvement

- Enhanced Primary Treatment (EPT) Factor: EWSI has scheduled inspection and cleaning of the remaining two clarifiers in 2023 and has commenced planning for proactive replacement of assets nearing end-of-life to minimize unplanned downtime.
- Biosolids Inventory Reduction Factor: Efforts will continue in 2023 to explore more non-agricultural re-use opportunities of biosolids, as well as development of additional on-site biosolids dewatering processes in response to the loss of production resulting from the dewatering facility shut down.
- **Energy Efficiency Factor**: In 2023, EWSI will continue to work on planning and design for upgraded secondary aeration blowers and the UV system. EWSI will also optimize the use of other equipment such as secondary aeration trimmer blowers.

3.2.4 Safety Index

The safety index is a measure of the success of programs and the application of policies that maximize the safety of employees and the public. The performance measures comprising this index include:

- Near Miss Reporting Factor (actual 300 vs target 220), calculated as the number of near miss reports completed each year. During 2022, there was a continued internal monthly promotion of near miss and hazard identification reporting to demonstrate to employees the impact of site-specific reporting.
- Work Site Inspections / Observations Factor (actual 1,499 vs target 919), calculated
 as the number of Work Site Inspections and Observations completed each year. Higher
 than target results reflect EWSI's continued emphasis to monitor and measure
 inspections and observations to ensure employee engagement.

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Lost Time Injury Frequency Rate Factor (actual 1.34 vs target 0.75) calculated as the
frequency of disability injuries and illnesses and All Injury Frequency Rate Factor
(actual 2.02 vs target 1.00) calculated as the frequency of disability injuries and medical
aid injuries. These factors are key measures for assessing the effectiveness of safety
programs. In 2022, following lost time events, EWSI undertook root cause analysis to
identify causal themes and provide a basis for developing strategies to reduce workplace
injuries.

- Near Miss Reporting Factor: In 2023, EWSI will continue to focus on near miss and hazard identification to promote reporting and demonstrate the benefit of site-specific reporting.
- Near Miss Reporting Factor: There will be a continued focus on inspection and observation completion to ensure engagement and proactive field presence.
- Lost Time Frequency Rate Factor: EWSI endeavours to eliminate workplace injuries and, to this end, will implement causal investigation methodology in 2023 to improve root cause identification and prevent re-occurrence of workplace injuries.

3.3 Drainage Services

Table 3.3-1 summarizes Drainage Services 2022 operational performance:

Table 3.3-1
Drainage Services 2022 Operational Performance

	А	В	С	D	Е	F	G	Н
			Performance				Maximum	Points with Maximum
	Description	Benchmark	Standard	Actual	Base Points	Points Earned	Bonus Points	Bonus Points
1.0	Environmental Index							
1.1	Stormwater Flow and Flow Monitoring Factor	% area monitored	63.0	70.0		13.0		
1.2	Environmental Incident Management Factor	% reportable	50	14		41.7		
1.3	Green Hectares Factor	managed area	45.0	36.9		9.6		
1.0	Environmental Index				35.0	64.2	3.5	38.5
2.0	Customer Service Index							
2.1	Service Maintenance Calls Factor	% resolved in 24h	80.0	96.8		6.0		
2.2	Emergency Dig-Ups – Service Restored Factor	% restored in 48h	98.0	98.0		5.0		
2.3	Service Connections Factor	% within 6 weeks	85.0	80.4		4.7		
2.4	Sewer Odour Hotspots Factor	% city area	15.0	7.0		10.8		
2.0	Customer Service Index				20.0	26.5	2.0	22.0
3.0	System Reliability and Optimization Index							
3.1	Blocked Sewers Factor	# per 100 km	2.10	2.54		6.2		
3.2	Sewer Renewal Factor	km renewed	60.0	56.6		7.1		
3.3	Infrastructure Condition Rating Level Factor	% > minimum	90.0	90.1		7.5		
3.4	Full Property Flood Proofing Inspections	# inspections	750	1,077		10.8		
3.0	System Reliability and Optimization Index				30.0	31.6	3.0	31.6
4.0	Safety Index							
4.1	Near Miss Reporting Factor	# completed	750	1,721		8.6		
4.2	Work Site Inspection/Observation Factor	# conducted	1300	2,262		6.5		
4.3	Lost Time Frequency Rate	frequency rate	0.75	0.18		16.0		
4.4	All Injury Frequency Rate	frequency rate	4.00	1.23		12.2		
4.0	Safety Index				15.0	43.4	1.5	16.5
Aggregate Points Earned (sum of all the above indices)					100.0	162.6	10.0	108.6
Points Required at Performance Standard								100.0
Points Above / (Below) Performance Standard								8.6

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Drainage Services service quality is measured by the results of four indices. Performance under each index is measured independently on a point basis with 100 base points available if the standards in all five areas are achieved. In total, up to 10 additional bonus points for performance above standard are available. In 2022, Drainage Services exceeded performance standards for each index, earning 8.6 bonus points. Highlights and opportunities for improvement for each index are provided below:

3.3.1 Environmental Index

The environmental index measures the success of Drainage Services programs and policies designed to mitigate and report adverse environmental impacts. The performance measures comprising this index include:

- 1. **Stormwater Flow Monitoring Factor** (actual 70.0% vs target 63.0%), defined as percentage of storm drainage area being monitored relative to all qualified hydrologically-effective drainage areas serviced by outfalls. In 2022, construction and activation of five new permanent outfall monitoring sites contributed to better than target performance.
- 2. Environment Incident Management Factor (actual 14 vs target 50), calculated as the number of incidents reportable to municipal, provincial or federal regulators that are considered preventable. The low number of reportable environment incidents in 2022 reflects proactive inspection and maintenance programs designed to minimize third party releases of prohibited or restricted waste.
- 3. Green Hectares Factor (actual 36.9 hectares vs target 45 hectares), measured by the area where the volume of green infrastructure managed runoff is spread evenly to a 15mm depth. While 2022 actual performance was lower than the PBR target, Drainage Services successfully implemented Low Impact Development (LID) at 82 locations in partnership with City of Edmonton, EPCOR construction sites and with a few commercial properties throughout the city.

Areas for Improvement

- Stormwater Flow Monitoring Factor: Nine additional permanent outfall monitoring sites
 are scheduled for construction and activation in 2023. Since projects can extend beyond
 a single year, some projects will be combined to improve design and construction efforts
 which in turn is expected to improve completion timelines.
- Environment Incident Management Factor: In 2023, EWSI will continue to provide educational programs for customers and other stakeholders on proper maintenance of private infrastructure so that risks are identified, and incidents minimized.

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• Green Hectares Factor: In 2023, Drainage Services will continue to enhance the overarching LID Strategy that will guide planning and development of Green Hectare projects for construction on both public lands and for commercial and industrial sites to increase storage of stormwater and slow water moving into the system. Drainage Services will also continue efforts to increase awareness and education of LIDs and small storage facilities within EPCOR, the City of Edmonton, and the development industry which includes both commercial and industrial sites as well as new and retrofit development projects through the modernization of standards work.

3.3.2 Customer Service Index

The Customer Service Index measures the success of Drainage Services programs and policies pertaining to customer service. This index is comprised of the following performance measures:

- Service Maintenance Calls Factor (actual 96.8% vs target 80.0%), defined as the
 percentage of service maintenance sewer trouble calls resolved within 24 hours. In 2022,
 Drainage Services achieved higher than standard performance through implementation
 of shift changes that took into account call volumes, as well as from the introduction of
 smaller, easier to mobilize and operate equipment.
- Emergency Dig-Ups with Service Restored Factor (actual 98.0% vs target 98.0%),
 defined as the percentage of emergency dig-ups restored within 48 hours from the time
 the call is referred from Drainage Operations to Drainage Construction as an emergency
 dig-up. In 2022, Drainage Services implemented a new less costly and less invasive
 technology, enabling more timely repairs on some service connections than traditional
 open cut repairs.
- Service Connections Factor (actual 80.4% vs target 85.0%), calculated as the
 percentage of new installations of sanitary, storm, and common trench water service
 connection completed within a six-week timeframe. In 2022, Drainage Services
 investigated alternate work methods to ensure the safety and efficiency of service
 connection installations and established a working committee to improve work
 opportunities with the developer community.
- Sewer Odour Hotspots Factor (actual 7.0% vs target 15.0%), measured as the percentage of the city area with odour hotspots. In 2022, Drainage Services expanded monitoring and inspection of odour sources through the sewer system. Drainage Services also completed debris and sediment cleaning, constructed air recirculation chambers and completed the first odour control optimization pump station. Finally, Drainage Services installed a chemical dosage system at a pump station with the third highest point source of hydrogen sulfide, which completely eliminated odours from this one facility.

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Areas for Improvement

- Service Maintenance Calls Factor: For 2023, Drainage Services will implement new initiatives to decrease time at customer locations and minimize repeat calls, including adding personnel and standardizing responses for first call resolution and issue assessment techniques.
- Emergency Dig-Ups with Service Restored Factor: For 2023, Drainage Services will
 explore opportunities, such as hydraulic shoring and directional drilling, to improve
 operational efficiencies and crew safety, as well as reducing the time required to complete
 work and restore service.
- **Service Connections Factor**: For 2023, Drainage Services will continue to implement hydraulic shoring to improve field efficiencies and reduce crew time.
- Sewer Odour Hotspots Factor: In 2023, Drainage Services will continue to monitor and inspect odour sources throughout the sewer system and will expand pump station odour control optimization.

3.3.3 Reliability and Optimization Index

The System Reliability Index measures the reliability of the sanitary and stormwater drainage systems. The performance measures comprising this index include:

- Blocked Sewers Factor (actual 2.54 vs target 2.10), calculated as the number of blocked sewers per 100 km of sanitary and combined sewer pipe. In 2022, Drainage Services experienced an increase in the number of blockages due to grease, rags and wipes. Each blockage was assessed to determine if a change to an existing flushing program or a new flushing program was warranted.
- Sewer Renewal Factor (actual 56.6 km vs target 60.0 km), measured as the km of sewers renewed / relined as part of the Neighbourhood Renewal Program, Local Sewer Rehabilitation Program, Arterial and Collector Roadway Renewal Coordination Program, SIRP Proactive Pipe Relining Program, Proactive Service Renewal Program and CORe Large Trunk Rehabilitation Program. Sewer renewal and relining are proactive maintenance activities. In 2022, the PBR target was not met due to increased focus on higher risk trunk line renewals which result in less length of sewer renewed for the cost required to complete the renewal.
- Infrastructure Condition Rating Level Factor (actual 90.1% vs target 90.0%), defined as the percentage of infrastructure at or above the minimum level of condition rating. In 2022, Drainage Services expanded infrastructure condition assessment to additional

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asset categories, including: storage pipes and tanks; gates and real-time control; permanent flow monitors; and SCADA components.

Full Property Flood Proofing Inspections Factor (actual 1,077 vs target 750), calculated as the number of full flood proofing inspections completed that include an inspection report provided to the property owner. In 2022, Drainage Services updated the Full Property Flood Proofing Inspections metric to include multi-family property inspections, as well as single family inspections. Drainage Services also implemented a new inspection form to better align inspection elements with the home flood protection education program.

Areas for Improvement

- Blocked Sewers Factor: In 2023, Drainage Services will implement enhancements to
 plugged main reporting and investigative follow-up to better determine patterns of
 plugged mains. Drainage Services will also explore development of an operational and
 maintenance program for the small diameter sanitary and combined sewers that directly
 contribute up to 95% of blockages.
- Sewer Renewal Factor: For 2023, Drainage Services will continue to focus on higher risk sewer infrastructure renewal to proactively reduce future emergency repair and rehabilitation and will be assessing this measure for future PBR submission to ensure it reflects the focus on higher risk renewal of aging infrastructure
- Infrastructure Condition Rating Level Factor: For 2023, infrastructure assessment will
 be further expanded to include manholes, catch-basins and catch-basin leads. Drainage
 Services will also focus on proactive inspection of poor and very poor condition assets to
 ensure that the worst condition assets are rehabilitated and thereby improve the asset
 condition.
- Full Property Flood Proofing Inspections Factor: For 2023, EWSI will continue outreach to properties within high risk flood basins and will re-engage with previously inspected properties to assess and evaluate customer engagement and completion of recommended actions.

3.3.4 Safety Index

The safety index is a measure of the success of programs and the application of policies that maximize the safety of employees and the public. The performance measures comprising this index include:

 Near Miss Reporting Factor (actual 1,721 vs target 750), calculated as the number of near miss reports completed each year. During 2022, two actions contributed to higher

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than target performance. First, Drainage Services stressed the importance of near miss reporting to its workforce, encouraging prompt reporting. Second, Drainage Services analyzed trends of reported near misses to reinforce the contribution of near miss reporting in reducing workplace injuries.

- Work Site Inspections / Observations Factor (actual 2,262 vs target 1,300), calculated
 as the number of Work Site Inspections and Observations completed each year. In 2022,
 Drainage Services analyzed trends from near miss reporting to focus on inspections and
 observations to further drive injury elimination and reduction.
- Lost Time Frequency Rate Factor (actual 0.18 vs target 0.75) calculated as the frequency of disability injuries and illnesses and All Injury Frequency Rate Factor (actual 1.23 vs target 4.00) calculated as the frequency of disability injuries and medical aid injuries. These factors are key measures for assessing the effectiveness of safety programs. In 2022, Drainage Services introduced a field-based ergonomics assessment process, which directly reduced the number of musculoskeletal injuries related to tasks involving manual handling.

Areas for Improvement

- Near Miss Reporting Factor: In 2023, Drainage Services will focus on identifying and mitigating hazards associated with everyday tasks to further reinforce the contribution of near miss reporting in reducing and/or eliminating workplace injuries.
- Work Site Inspections / Observations Factor: For 2023, trending analysis will be used to encourage completion of inspections & observations.
- Lost Time Frequency and All Injury Frequency Rates: For 2023, Drainage Services
 will focus on field ergonomic assessments on areas indicated by trend analysis and other
 areas targeted by management. Causal investigation methodology will also be
 implemented to improve root cause identification and to prevent re-occurrence of
 workplace injuries.

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4 Rates and Bill Comparisons

Residential water and wastewater bill comparisons for 2022 are based on the published water, wastewater treatment, sanitary and stormwater rates for Calgary, Vancouver, Saskatoon, Winnipeg and Regina, as well as three surrounding municipalities (St. Albert, Sherwood Park and Leduc). These bill comparisons represent the total cost to the customer and include fixed charges, consumption charges and any other applicable surcharges based on readily available data from cities and municipalities.

Figure 4-1 provides a comparison of residential water bills with consumption of 14.0 m³ per month, the average monthly water consumption for a residential customer in Edmonton in 2022. Edmonton is the only city in this comparison where fire protection charges are included in water rates. Therefore, Edmonton's average monthly residential bill of \$41.90 which includes fire protection charge of \$2.54 has been normalized to \$39.36 for this comparison. Figure 4-1 shows that Edmonton's water bills are competitive with most of the cities and local communities surveyed. Vancouver and Calgary continue to have the lowest rates due to its excellent raw water source and, therefore, lower needs for water treatment than Edmonton, which has a naturally high variable water source in the North Saskatchewan River.

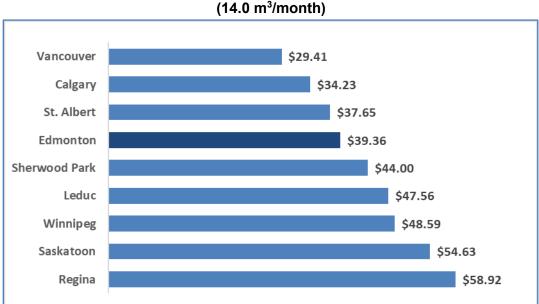


Figure 4-1
2022 Average Residential Water Bills
(14.0 m³/month)

Figure 4-2 provides a comparison of average residential sanitary drainage and wastewater treatment bills with consumption of 14.0 m³ per month, the average monthly water consumption for a residential customer in Edmonton in 2022. These bill comparisons

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represent the total cost to the customer and include fixed charges, consumption charges and any other applicable surcharges for wastewater treatment.

Although Edmonton's sanitary drainage and wastewater treatment bills appear higher relative to the comparison communities, the comparison does not reflect the impact of historical spending decisions by each community. For example, EWSI is expending significant resources on the CORe program to address corrosion issues and to remediate long-running odour issues in its sanitary sewers. In 2022, Edmonton residential bills included a special rate adjustment of \$2.94 per month for the CORe program.

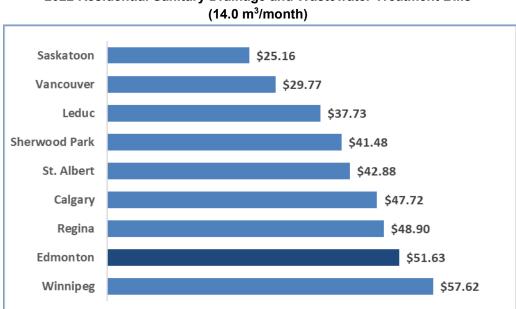
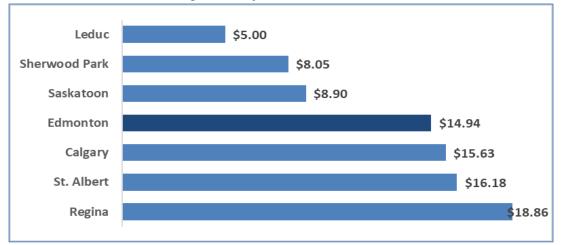


Figure 4.2
2022 Residential Sanitary Drainage and Wastewater Treatment Bills
(14.0 m³/month)

Figure 4-3 provides a comparison of average monthly residential stormwater bills for 2022. The nature and extent of stormwater drainage services varies among municipalities, due to geography and climatic conditions, with different cities facing different risks from storms, overland flooding and sea level. In addition, in some municipalities, flood mitigation and stormwater drainage charges are included in property taxes which makes this bill comparison challenging. Stormwater charges embedded in property taxes for Vancouver and Winnipeg were not readily accessible and therefore not reflected in the figure below. EWSI has been proactive in addressing the increased risk of flooding related to climate change and is making substantial investments through its SIRP program to assess and mitigate these risks. EWSI's 2022 average stormwater bills are comparable to cities that have started addressing risks related to climate change such as Calgary, St. Albert and Regina.

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Figure 4-3
2022 Average Monthly Residential Stormwater Bills



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Appendix A: PBR Framework

In 2021, Edmonton City Council approved EPCOR Water Services Bylaw 19626 and EPCOR Drainage Services and Wastewater Treatment Bylaw 19627. Bylaw 19626 provides for continuation of performance-based regulation ("PBR") for In-City Water Services for a five-year term from April 1, 2022 to March 31, 2027, while Bylaw 19627 provides for continuation of PBR for Wastewater Treatment and Drainage Services' Sanitary and Stormwater Utilities for a three-year term from April 1, 2022 to March 31, 2025.

A. Overview

The PBR framework encompass rates, performance measures, and return on equity. The relationships between these components are designed to ensure that capital and operating cost decisions provide a balance between operational performance, rates, and return on equity, while safeguarding system reliability and service quality, providing fair, stable, predictable rates to rate payers, and providing a basis for the future development of the water, wastewater treatment, and drainage systems. Several key changes were introduced for the 2022-2024/2026 PBR term, including:

- 1. Introduction of a Consumption Deferral Account: EWSI was directed to introduce a water consumption deferral account for each of Water, Wastewater Treatment and Drainage Services with the intent of capturing and accumulating variances related to consumption over the 2022-2024/2026 PBR terms and subsequently collecting or refunding the accumulated consumption variances through customer rates in future PBR terms. In the past, revenue risk related to consumption was borne by EWSI. The introduction of deferral account reduces EWSI's exposure to revenue risk resulting from volatile consumption patterns however, this risk and volatility is now borne by customers.
- 2. Reduction in Return on Equity (ROE): Return on equity for Water and Wastewater Treatment was reduced from 10.175% to 9.89%, with a further 0.25% reduction to 9.64% to offset the reduction in risk associated with the introduction of a consumption deferral account. Return on equity for Drainage Services was reduced from 9.64% to 5.50% in 2022. Drainage Service ROE is approved to be "ramped up" by 1.1% per year to achieve a fair rate of return of 9.64% by 2026.
- 3. **Drainage Efficiency Factor**: Efficiency factor for Drainage Services was increased from 0.25% to 0.50% for the 2022-2024 PBR term.
- 4. Introduction of Fire Protection Charge: EWSI was directed to include recovery of the public fire protection revenue requirement through water rates over the 2022-2026 PBR term instead of the past practice of recovering fire protection revenue requirement through City's property taxes.

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B. PBR Rates

Annual changes to In-City water, wastewater treatment and sanitary and stormwater utility rates consist of routine rate adjustments and, occasionally, non-routine adjustments.

I) Routine Rate Adjustments

Routine rate adjustments are limited to inflation, defined as a weighted inflation metric consisting of both CPI and labour components, less an efficiency factor, plus special rate adjustments approved by City Council as part of the 2022-2024/2026 PBR Applications. The use of a formulaic approach for calculating and setting utility rates act as a "price cap" providing ratepayers with stable and predictable rates. The efficiency factor for In-City water and wastewater treatment is set at 0.25%, while for sanitary and stormwater, the efficiency factor is at 0.50%. The efficiency factor incents EWSI to increase productivity and achieve efficiencies in excess of inflation in order to meet its targeted return on equity. The Special Rates Adjustments (SRA) approved for the 2022-2024/2026 PBR term, include:

- SRA for Re-basing (In-City Water, Wastewater and Drainage Services): The SRA for re-basing accounts for the difference between EWSI's revenue requirement forecast for the 2022-2026 PBR term and the revenue that would be realized by limiting annual rate increases to PBR inflation. The resulting revenue requirement difference (shortfall or surplus) gets collected from or refunded to ratepayers over the current PBR term through a SRA for re-basing.
- 2. SRA to Increase Monthly Service Connection Fees (In-City Water): The SRA to increase monthly service connection fee adjusts EWSI's rate structure to generate higher portions of revenue from fixed service charges, with a corresponding decrease in variable rates in order to help minimize the impact of declining rate revenue due to declining consumption over the 2022-2026 PBR term.
- 3. SRA for 90 Day Deferral Program basing (In-City Water, Wastewater and Drainage Services): Alberta's Utility Payment Deferral Program Act was introduced in 2020 by the provincial government for electricity and gas utility customers in order to provide temporary financial relief to Albertans who were experiencing financial hardship due to COVID-19. City Council directed EWSI to implement a similar program to allow its customers to defer their water, wastewater treatment and drainage utility bill payments, without interest or penalty, for a 90-day period from March 18, 2020, to June 18, 2020. The program ended on June 18, 2020, and customers had one-year (June 18, 2021) to repay the entirety of their deferred payments. For the 2022-2024/2026 PBR Applications, EWSI received approval for a SRA to recover the forecasted bad debt expense, administration and carrying costs associated with the 90-day deferral program. The SRA was approved as a one-time increase to 2022 rates, which is removed from 2023 rates to ensure that the SRA does not generate any incremental revenue over the PBR term.

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Furthermore, the approval included 2023 incremental bill adjustments to true up actual incurred costs.

- 4. SRA for Public Fire Protection (In-City Water): Prior to April 1, 2022, EWSI recovered the public fire protection revenue requirement through the Fire Hydrant Service Agreement with the City of Edmonton Fire Rescue Services Department, which was funded through the City's property tax levy. Edmonton City Council directed EWSI to include the recovery of the public fire protection revenue requirement through water rates over the 2022-2026 PBR term by way of a special rate adjustment that is added to fixed monthly service charges.
- 5. **SRA for SIRP and CORe** (Drainage Services): These special rates adjustments provide funding for two critical Drainage Services strategic initiatives:
 - a) The SIRP strategy is a \$1.6 billion system wide integrated approach, which is expected to be completed over the next 20 to 30 years to mitigate flood risk. The SIRP strategy includes investments to mitigate flood risks across the City of Edmonton by using a mix of grey (SIRP MOVE trunks and tunnels) and green (SIRP SLOW dry ponds and low impact developments (LID)) infrastructure installed in public right-of-way, City-owned land or EPCOR owned land. Implementation of the SIRP program began in 2019 and recovery of the SIRP program costs during the 2022-2024 PBR term is funded through a SRA to stormwater rates.
 - b) The CORe strategy focuses on preventing the formation of hydrogen sulphide (H₂S) gas, which will help reduce community odour impacts and lengthen the life of sewer network assets. Implementation of the CORe program began in 2019 and is expected to be completed by 2026. Recovery of the CORe program costs during the 2022-2024 PBR term is funded through a SRA to sanitary rates.

II) Non-Routine Rate Adjustments (NRA)

The PBR framework facilitates rate adjustments for events or activities that are unusual, significant in size or nature and beyond the scope of control of EWSI. Non-routine adjustment criteria defined per Schedule 3 of Bylaw 19626 and Bylaw 19627 must be met in order for the NRA to be approved.

C. Performance Measures

Performance measures are an integral part of EWSI's PBR framework, which includes measures and targets for water service quality as described in Schedule 3, Section 3 of Bylaw 19626, and wastewater treatment and drainage service quality as described in Schedule 3, Sections 3 and 4 of Bylaw 19627. Annually, an independent auditor audits EWSI's performance against established measures and targets. These measures ensure the maintenance of a standard level of operational performance and ensures that EWSI does

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not compromise system reliability and service quality as it seeks to identify cost saving opportunities during the PBR term. EWSI faces financial penalties ranging from \$400,000 up to \$2,400,000 if it does not meet or exceed the performance standards established within the PBR, providing assurance to customers that water, wastewater treatment and drainage services system reliability and service quality is not sacrificed to keep rates low or to increase returns to EWSI.

D. Return on Equity

The PBR plan incorporates a forecast rate of return on equity commensurate with consumption, cost and other risks that allows EWSI to finance its operational and capital programs, to provide its customers with high levels of service quality and reliability, and to provide "just and reasonable" returns to its shareholder. Achieving this return is dependent on EWSI achieving operating cost efficiencies, meeting, or exceeding performance standards, and developing the utility infrastructure needed to provide service to its customers. For the current PBR term, return on equity is based on a deemed capital structure of 60% debt and 40% equity with awarded rates of return as follows:

- Return on Equity for Water and Wastewater Treatment Services: A return on equity
 of 9.64% was approved for Water and Wastewater Treatment services for the current
 PBR term.
- Return on Equity for Drainage Services: The return on equity approved for Drainage services during the 2022-2024 PBR term is lower than the fair rate of return of 9.64%. In order to moderate rate increases for Drainage services during the 2022-2024 PBR term, return on equity for Drainage services was reduced from 9.95% to 5.50% in 2022. Beginning in 2023, Drainage return on equity was approved to be "ramped up" by 1.1% per year to achieve a fair rate of return by 2026.

E. PBR Rate Structures

I) In-City Water

In-City Water customers are grouped into three customer classes: residential; multiresidential; and commercial. In-City customers pay a variable consumption charge as well as a fixed monthly service charge. The fixed charge recovers costs that are directly attributable to a customer such as costs of the water meter, customer service and billing whereas variable consumption charge captures all the costs of operations, maintenance, administration and capital investment associated with operating the water treatment, wastewater treatment, sanitary and stormwater drainage utilities.

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- 1. **Residential Customer Class**: Residential customers are charged a monthly service connection fee that varies with the size of the service, plus a variable charge for water consumption. Residential water rates are based on an inclining block structure with three consumption blocks (0 to 10 m³, 10.1 to 35 m³ and >35 m³). A higher consumption charge is applicable to residential customers who use larger volumes of water while consumption charge is lower for residential customers who use less water. The inclining block structure promotes water conservation and incents customers to be efficient with their water usage, either by using water-efficient appliances or behavioral change such as more efficient lawn watering practices.
- 2. **Multi-Residential Customer Class**: Multi-residential customers are charged a monthly service connection fee that varies with the size of the service, plus a variable charge for water consumption. Multi-residential water rates are based on a declining block structure with three consumption blocks (0 to 100 m³, 100.1 to 1,000.0 m³ and >1,000 m³). Multi-residential customers have less seasonal variability in water consumption and make lower peak demands on the waterworks system than residential customers. At the same time, multi-residential customers do not use the same volume of water or have the same infrastructure requirements as commercial customers. As a result, they have a unique declining block rate structure.
- 3. **Commercial Customer Class**: Commercial water rates are based on a declining block structure with five consumption blocks (0 to 25 m³, 25.1 to 100 m³, 100.1 to 1,000.0 m³, 1,000.1 to 5,000 m³ and >5,000 m³) resulting in a lower per cubic meter rate as the customer uses more water. Commercial and institutional customers tend to have stable consumption patterns, which remain stable throughout the day, and each day of the year. EWSI has set the size of the declining blocks for the commercial rate class based on the results of a statistical study of water usage by the type of customer within the commercial class pay a similar water rate and helps promote equity within the commercial rate class.

II) Wastewater Treatment Rate Structure

Wastewater treatment customers are classified into the same category as water service customers (i.e., residential, multi-residential and commercial) and each class of water service customers also qualify as a wastewater treatment customer for that class.

- Residential and Multi-Residential Customer Class: Wastewater treatment charges are based on a flat rate structure with a single wastewater treatment rate applied to each cubic meter of water consumed. Residential and multi-residential customers are charged a monthly service connection fee, plus a variable charge for wastewater treatment based on their water consumption.
- 2. **Commercial Customer Class**: Commercial customers are charged the same monthly connection fee as residential and multi-residential customers, but unlike consumption

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charges for residential and multi-residential customers, the commercial customer class uses a declining rate structure with three consumption blocks. The first block is for customers consuming less than 10,000 m³ of water per year (over 95% of commercial customers), the second is for customers consuming 10,000.1 to 100,000 m³ of water consumption per year and the third block is for customers consuming over 100,000 m³ per year.

3. Overstrength Surcharges: Wastewater treatment services provided to commercial customers include additional monitoring, sampling, and testing of wastewater potentially containing one or more constituents, such as oil and grease, phosphorus, and other compounds considered to be harmful to the environment. Customers who release wastewater into the sewer system that contains these compounds are billed overstrength surcharges for each kilogram of surchargeable matter per cubic metre of wastewater in excess of prescribed concentrations.

III) Drainage Services Rate Structure

Consistent with In-City Water and Wastewater, Drainage Service's sanitary and stormwater utility customers are assigned to residential, multi-residential and commercial customer classes. The customer definitions and other classification criteria are generally consistent among In-City Water, Wastewater and Drainage Services. Therefore, each class of water or wastewater treatment customer also qualifies as a sanitary or stormwater utility customer for that class.

- 1. Sanitary Utility Rates: Sanitary rates are designed to collect the costs associated with wastewater collection services. Sanitary rates consist of a flat monthly charge levied on each customer's premises that varies with the size of the premises' water meter and a variable monthly charge based on a rate per cubic metre of either metered water consumption for the premises, or, if a sewer meter has been installed, the sewer discharge for the premises. The sanitary utility rate design also includes a provision for EWSI, under the conditions of the Utility Credit Programs, to provide a utility credit to discount metered water volumes. In the 2022-2024 PBR plan, there is only one customer, the University of Alberta that receives a utility credit. This credit provides a 44% reduction to the sanitary utility variable rate to recognize that the University of Alberta is a large wholesale customer that owns and operates its own on-campus collection system.
- 2. **Stormwater Utility Rates**: Stormwater rates are designed to collect the costs associated with the management of stormwater runoff. The current stormwater rate design consists of a single rate applied to the product of:
 - a. The area of the property in square metres and, for multiple units sharing a single building, the proportion of the building lot area attributable to each unit;
 - b. The development intensity factor, which measures the portion of lot being used for its intended development. The development intensity factor is set at 1.0, except for those

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properties where owners demonstrate that they contribute significantly less stormwater runoff per property area to EWSI's land drainage system during rainfalls than other similarly-zone properties through the use of retention/detention ponds or other stormwater best practices. Applications for changes to the development intensity factor are made in accordance with the terms and conditions of the Utility Credit Programs; and

c. The runoff coefficient, which measures the permeability of the lot's surface (i.e., grass versus concrete), based on land zoning. The runoff coefficient ranges from 0.20 (e.g., agricultural zone AG) to 0.95 (e.g., commercial business zone CB2). As point of reference, a single-detached residential home (Zone RF1) has a runoff coefficient of 0.50. The runoff coefficients are included in Schedule 1 of the Drainage Services and Wastewater Treatment Bylaw.