INTERVENOR: French Creek Residents' Association (FCRA)

FINAL SUBMISSION – March 23, 2015

APPLICATION: EWW – 2015-2017 REVENUE REQUIREMENT APPLICATION

This document will address items in the same paragraph order presented in EWW Final Comments dated March 16, 2015.

15. We disagree that "EWW complied with this direction" [Comptroller Order 2310 to limit its future capital expenditures when filing its next revenue requirements for 2015].
We believe EWW makes plans, employs consultants and spends funds in excess of what is required to operate this small utility at a reasonable cost for it's customers and they now propose to expand on those demonstrated activities. In a number of cases EWW has spent far in excess of the Comptroller Decision such as salaries, vehicle purchase and well drilling/development. This activity also increases the Return on Equity. EWW has professed ignorance and lack of experience in budgeting unforeseen significant costs relative to well drilling/development as stated in CWR-EWW-2.2. We expect that EWSI should be sufficiently knowledgeable to provide guidance considering that water systems and delivery services are it's only business and for which EWW pays substantial Inter-Corporate Service Charges.

24. Well Rehabilitation: We are not aware EWW needs to "restore lost capacity" because no statistics are quoted to support such. EWW comments it needs to complete this project to "avoid more rapid deterioration of well capacity" but has not provided any history other than to state that EWW's consultant KWL has indicated wells should be rehabilitated every five to ten years. We are aware that some wells have been in-service since the early 80's and they are operating satisfactorily. We are not aware if there is any degradation or if any wells have been rehabilitated prior to and/or after EWW bought the French Creek utility. We are also aware this project was deferred from RRA 2012-2014 but question the need to spend $81,000 in this rate period rather than spread same over two rate periods to lessen the impact. FCRA feels this partial deferral has merit when considering that present system capacity, including wells remaining to be tied in, exceeds present and forecast growth requirements by a wide margin (35 L/s required to 50 L/s available).

25. System Balancing and Storage Control: Considering the increase of available water from new wells as mentioned above, which have recently been developed on both sides of French Creek, we do not understand why EWW through it's consultant KWL would wish to spend $27,000 to determine if "additional upgrades may be required". It is not reasonable to expect that leaving a valve open on a line under French Creek would offer an increase in existing pressure or flow for either section when existing flows on each side exceed present and forecast flow volumes; nor why this need has arisen now when available volumes were lower (and thus so were pressures during peak hours) in prior years from fewer existing wells in-service and French Creek surface water sources at that time. It is also not reasonable to expect that water in the line under French Creek could enhance pressure on the east bank (Wembley Road side) considering this water would need to flow uphill and the Master Plan says, in fact, that a check valve/pressure valve would have to be installed to prevent backflow and undue pressure increases on the west side (Drew Road and area) if the valve under French Creek was left open. Pre 2012 there were 14 in-service wells and the current 16 will increase to 19 when the 3 new wells are tied-in. The Comptroller may wish to know that the east side of French Creek is at a much higher elevation overall than the west side, the system being physically split by French Creek.

In conjunction with this in paragraph 47 is the planned Model Validation and Rezoning Study costing $30,000 which is also intended to determine the cost of improving fire flow and peak hour pressure.
Both of these studies are not imperative nor required based on existing demand and abundant available supply from new wells on both sides of French Creek coupled with sufficient pressure in the area of concern which is the Wembley Road Area Pressure Zone. The latter was

communicated to FCRA on August 7, 2014 by EWW Manager Dan Skidmore concerning pressure in the immediately adjacent upper Lowry's Road area which was quoted at 48psi. That period was a seasonal peak flow interval. We have all emails on file.

There are discrepancies for costs quoted by EWW in the Rate Application and in CWR-EWW-1.1-1 for the above projects:

	Application	CWR-EWW-1.1-1
Rehabilitation (Rate Base)	$199,000-table 7.1-1	$81,000
(Contributed)	$ 47,000-table 7.1-1	nil
Leak Detection Program	para 151-portion of $92,000	$35,000
Model Validation and Rezoning	para 151-portion of $92,000	$30,000
Totals	$338,000	$146,000

28. Meter Replacements: We do not disagree with a 20 year replacement cycle but disagree with the EWW comment in CWR-EWW-1.1-1 indicating there is a "high level of risk" and "costs for non-revenue water get passed to all customers". Meter replacement costs are also passed to all customers so there is no offsetting gain for existing customers. FCRA is adverse to spending $210,000 in this rate period and believe it is reasonable to spread this expense over two or more rate periods to defray the cost impact. It also seems to us that an increase of $35,000 from budget in RRA 2012-2014, as questioned by the Comptroller in IR 1 is not reasonable.

29. Hydrants: In CWR-EWW-1.1-1, EWW says "available fire protection <u>may be</u> compromised" which does not support comments that public safety is unacceptable. EWW states in the Application para 29 that hydrant costs are not recovered through rates. We do not understand why this expense is mentioned by EWW in conjunction with providing a response to the Comptroller concerning CWR IR1, 1.0 when asked "what actions EWW could undertake to lessen rate increases".

31. Wells Projects: As indicated in FCRA IR1-para 66, it is not reasonable to reapportion costs that were approved in RRA 2012-2014 between Rate Base and Developer for wells that provided a windfall by subsequently delivering more than was expected or needed. The apportionment of costs should remain as originally planned by EWW and approved by the Comptroller. This is partially the content of our IR comment:

Although water volume supply from two new wells ACs1 and RWs1 is greater than anticipated this does not change the purpose or reason the wells were drilled nor the RRA 2012-2014 plan for funds being allocated 100% ACs1 and 20% RWs1 for developer and 80% RWs1 for rate base. EWW proposes to reallocate $503,000 from Developer to Rate Base due to the unexpected increase of 4.5 L/s (15.3 minus 10.8 L/s) and on that basis has adjusted the proportional allocations to 29% developer and 71% rate base for both wells. By adjusting contributions EWW is penalizing the rate base for volumes not forecast in RRA 2012-2014 nor required in this application.

FCRA requests that the Comptroller require allocations to be returned to apportionments originally approved in RRW 2012-2014.

40. Salaries: In Order 2310 the Comptroller required salaries to escalate no more that 2% for each of the years in test period 2012-2014. 2014D was $405,000 but 2014F was $492,000 for an unapproved excess over Decision of $87,000 or 21.5% in that year alone. EWW now proposes to plan salaries for the next rate period more or less using the 2014F base to determine salary costs for RRA 2015-2017.

EWW explains in Application para 139 that the majority of the excess in 2014F is due to "$60,000 for EWSI senior management that was inadvertently omitted from RRA 2012-2014" and a further huge excess of $17,000 for benefits but which is unexplained. They offer no explanation for the high cost indicated for 2013A in Table 5.1-1 of the Application which also substantially exceeded Decision. This performance and basis for the RRA 2015-2017 salary costs is unacceptable and should be disallowed by the Comptroller.

We further believe that adding salary cost allocations from EWSI must be actually classed as Inter-Corporate Service Charges and not be allocated to Salaries and Benefits which should only represent direct employee costs for EWW operations.

As mentioned in 42 below, we realize EWW has provided amended 2013A figures in Final Comments Table 5.1-1 based on shared manager costs and that this will not re-occur in 2015. Our remarks and comparison of costs remains unchanged because the removed portion was nothing more than a beneficial result of staff vacancy circumstances and did not result from a need or desire by EWW to reduce salary costs.

42. The statement in this paragraph concerning "the average rate of increase to salaries and benefits during the last test period was 1.8%" is closer to Decision only if the transfer of EWSI senior management cost and the unexplained benefits excess is ignored. Together those costs caused Actual to exceed Decision by 21.5% in 2014 which is a blatant disregard of the Comptroller's decision for 2012-2014.
We do note EWW has amended 2014A figures in Final Comments table 5.1-1 by partially removing costs for a shared manager but they also state this adjustment will not re-occur in 2015. This means that under normal staffing circumstances, salary excessive costs should still be viewed as we have commented above in relation to the Application. FCRA wishes to point out for the benefit of the Comptroller that this management sharing activity took place for most of 2014 with Dan Skidmore being involved with Sooke and then Brittania Beach – 10 plus months prior to RRA 2015-2107 being submitted to the Comptroller in late December 2014. FCRA had occasion to discuss well costs with Mr. Skidmore by email in early March 2014 prior to which he was seeing to other duties outside French Creek and had not responded to emails and a telephone call. His title on emails at the time was – Operations Manager – Epcor Water, French Creek/Sooke Operations.

46. Leak Detection Program: EWW plans to spend a further $35,000 on this project. In CWR IR1, 7.0, the Comptroller comments that the Master Plan "states that it is not economically viable to reduce leakage much further". In CWR-EWW-7.0, EWW responded that the consultant recommends the project be completed "so that EWW has a good understanding of existing system losses and to determine if additional savings can be achieved". We believe that to spend further funds for nominal benefit cannot be supported. Further, to provide a comfort for EWW to have a "good understanding" is irrelevant in this circumstance and if the consultant believes it is not economically viable to reduce leakage further then any "additional savings" would not justify the cost for completion of the program. We note that CWR-EWW-1.1-1 indicates a cost of $35,000 while CWR-EWW-19.2-1 indicates a cost of $30,000. We request the Comptroller to direct that this project be terminated.

47. Model Validation and Rezoning Study: Please also refer to our comments in 25 above. FCRA submits that with volume flows having drastically improved with the new wells in-service and the wells to be tied-in, there are no volume issues and therefore sustainability of pressures even in peak periods has also improved. If there is any degradation in the New Wembley Road Area Pressure Zone due to the 54 unit development that has been approved but not yet broken ground, then any studies or hard costs must be covered by contributed funds. We note that CWR-EWW-1.1-1 indicates a cost of $30,000 while CWR-EWW-19.2-1 indicates a cost of $35,000 for this project. We request the Comptroller to direct that this project be terminated.

49. Taste and Odour Study: In view of the fact this project was planned to address the concern expressed by only two CAP members and that 83% of EWW's customers are satisfied with water quality, we trust that as per CWR-EWW-26.0 this cost of $25,000 will be eliminated rather than deferred.

50. Master Plan Update: The Comptroller has questioned the need to update the Master Plan on a 3 year interval and suggested that an interval of 5 to 7 years is more appropriate. The last report produced prior to the KWL Master Plan was by Koers and Associates in 2004. The system was then owned by Breakwater Enterprises and there were considerable deficiencies which have since been corrected. FCRA sought engineering advice on this issue and has been advised that a report of this nature and scope should not need to be updated or revisited for a water utility earlier than 8 to 10 years. It should be recognized that EWW has owned this system since 2006 and the Master Plan prepared in 2014 was 8 years after the purchase and some 10 years after the Koers report. FCRA believes that updating the Master Plan on a 3 year cycle is unreasonable, represents excessive cost for customers and should be eliminated from this rate period. We also

note that CWR-EWW-1.1-1 indicates a cost of $45,000 while CWR-EWW-19.2-1 indicates a cost of $26,000.

52 through 55. Inter-Corporate Service Charges: We are disturbed by the continuing escalation of charges to EWW for services deemed necessary and which are not/have not been provided by consultants through numerous project reports even though considerable funds are expended for that purpose. RRA 2015-2017 will see an increased cost of $79,000 for the entire period over RRA 2012-2014 which amounts to an increase of 15.3%. If $60,000 for EWSI senior management and perhaps the unexplained $17,000 in benefits as discussed in para 40 and 42 above is placed in this category where it should be, the impact is substantially worse. Impact with $60,000 included – $139,000 now 26.9%, with $17,000 also included - $156,000 now 30.2%.
We wonder what this senior management person is being paid and what portion is EWSI attempting to charge EWW considering the large amount ie $60,000. We also question if this charge is fair, why same is occurring many years after EWW purchased this utility and what benefit there is to EWW customers. The high level of these inter-corporate service charges are not acceptable and must be reduced.

56 & 57. Public Consultation: While this category does not affect rates, EWW offers comments to support statements that it maintains regular contact with it's customers. We are aggravated by the implications and perceptions put forth by EWW relative to a CAP meeting held on December 10, 2014 for discussion of RRA 2015-2017.
In FCRA IR 1 FCRA attempted to clarify the circumstances relative to an extra meeting held that day which EWW says they scheduled to allow one CAP member to attend and review the Application. EWW implies this was done for the benefit of the CAP member.
In 57, EWW re-states that when they learned one CAP member would be unable to attend, EWW scheduled an additional meeting to ensure it could communicate the Application information to all members. This is misinformation and EWW is taking credit for doing something they had actually desired and not the CAP member. The CAP member who could not attend the scheduled meeting is the writer of this FCRA final submission, namely Robert Williams.
As per emails on file, this is what occurred:

- on Nov 24, 2014, Williams emailed Terrie Moore, EWW facilitator, stating he did not feel "that discussing the matter [RRA 2015-2017] in a CAP meeting is of any value due to detail". Williams also said, if we are going to discuss he expected EWW would forward the document prior to the meeting.
- later on Nov 24th Williams emailed Moore again, stating he now realized he had a Doctor appointment on the 10th and would not attend.
- Moore responded and said that EWW wanted Williams at the meeting in his capacity with FCRA and "would really appreciate your input", suggesting either another date or time. Moore also said that for various reasons EWW could not forward the Application document prior to the CAP meeting.
- Williams responded to Moore on the morning of Nov 25th and said that with the CAP meeting being devoted to discussing the Application which is a lengthy detailed document based on historical numerical data, it is difficult to provide any meaningful comment. However, to accommodate EWW Williams suggested he could meet with EWW staff prior to the 10th.
- Moore emailed Williams and asked if she could phone him.
- Moore telephoned and Williams said he felt the meeting would be a waste of time but was willing to accommodate EWW's request. Williams offered to meet on the morning of the 10th rather than incur extra cost for both EWW staff and the meeting facility by meeting a day earlier on the 9th as suggested by Moore. It was agreed to meet at 9:00 am on the morning of the 10th – the scheduled meeting with other CAP members would occur later that day at 1:00 pm.
- when Williams attended the meeting on the 10th, one other CAP member was in attendance who stated he had also been unable to attend and Moore had suggested he attend the meeting arranged with Williams.
- the Application presentation was via an MS PowerPoint summary and was very cursory. Williams made comment of same and also stated, twice, that he was shocked by the proposed rate increases and rate riders. In Williams' opinion the meeting was a waste of time because there was no opportunity to scrutinize the information and EWW staff stated all information was

confidential and could not be mentioned to anyone not on the CAP which meant there was no material to take away.

60. Rate of Return on Equity: Effective January 1, 2013 the BCUC determined that for small utilities a fair rate of return was 8.25% plus a premium of .5% for financial flexibility, total 8.75%. The rate was reviewed in 2014 and remains in effect today.
EWW has been accorded a premium of 1.3% above the benchmark rate based on it's argument there is higher business risk associated with operating this small utility. We submit that the size of our utility is irrelevant in this regard and EWW actually has no risk for 5 reasons:

- EWW customers are 'captive' in that they have no other choice than to deal with EWW for a water supply. Customers also cannot simply decide to terminate their water supply because there is no alternative for domestic uses, especially sewer.
- any unusual or unforeseen circumstances such as partial delivery system or equipment failure or collapse will be repaired or replaced at the expense of all customers and not from EWW funds. EWW therefore has no equity risk.
- all growth/development costs are borne by the developer/builder who also pays a CIAC charge which is held in trust to cover costs for growth wells and associated expenses.
- EWW is guaranteed a profit (return on equity) no matter what happens to the economy overall or even for lack of proper operation of the system itself by EWW. This factor is unequalled in the business world of 'for profit' companies where competition is the rule and nothing is guaranteed.
- EWW is also guaranteed to cover all costs and obtain a profit return even if the forecast customer count or usage volumes are not met: via rate riders in the subsequent rate period.

The BCUC states the benchmark rate is a "fair rate of return" for small utilities. The BCUC does not provide same on the basis it is a point for discussion to justify adding a premium above the determined rate unless it can be demonstrated there are risks such as for example, a company supplying natural gas where the consumer does have other alternatives available to them and could terminate their gas service.
We do not believe the Comptroller should allow any premium above the benchmark rate and that 8.75% is a satisfactory and fair return for EWW.

66. Escalators: The Comptroller has expressed concern that the escalation factors submitted by EWW and compiled by Dr. Ryan in September 2013 may not be relevant today considering the current and continuing climate regarding salary and construction costs as they have been affected by the collapse of oil prices. Notwithstanding the recent report by the BC Ministry of Finance concerning salary escalators, which can be mainly attributed to union contracts presently in force, we agree with the Comptroller and would point out that the Prairie and Maritime provinces are seeing a drop in house sales and prices combined with an increase in unemployment in all business sectors. On Wednesday March 18th alone 1,000 layoffs were announced in Calgary affecting office employees in 3 large oil companies. Blue collar layoffs are continuing and some accommodation camps in northern Alberta are now empty. The economic prospects are that this slump will continue probably for at least the next 2 years even if oil prices increase because there is a glut of supply in storage. In fact, reports during the week of March 15th indicates the US is approaching a limit to their ability to store unsold oil from their own sources as well as from Canada.

69. Deferral Accounts and Rate Riders: During the previous rate application hearings in 2009 and 2011, FCRA mainly relied on Regional District of Nanaimo information and cautioned that EWW was inaccurately forecasting customer growth. FCRA was unsuccessful in having the forecast reduced. In this last rate period there were roughly 60 new connections while EWW had forecast 150. This is an error of epic proportion at only 40% of forecast. EWW has offered that there were economic factors that caused this discrepancy and once again we point out this is not correct and growth forecasts were known by other parties in 2011 but were not supported by EWW. We are also aware the majority of the proposed rate rider is comprised of undelivered water charged to the Consumption Deferral Account.
FCRA feels that it is fundamentally unfair to apply a rate rider to new customers for undelivered water and other costs that result from an earlier rate period and this practice should be reviewed by the Comptroller.

We note that EWW is forecasting a more reasonable customer growth count for RRA 2015-2017 but we dispute the average monthly usage of 19.4 m^3 which we believe should be lower at 19 m^3 even though 2014 Actual was higher than 2013A or 2012A. We are also aware that no matter how many customers there may be, the approved revenue requirement is apportioned and required to be contributed by the utility's customers regardless of errors in customer count or usage. If the customer count/usage was forecast lower then water rates would be higher, assuming the Decision for costs remained unchanged.
However, seeing a Rate Rider increase of 300%, comparing 2014 to the average for 2015-2017, is disappointing and unfair to EWW customers. We believe that a utility operator should be responsible for accuracy and there should be an incentive to ensure this occurs.
Accordingly, FCRA proposes that the profit/return portion of the consumption volume shortfall charge should be removed or credited back as a separate accounting entry when it is debited to the Consumption Deferral Account. For obvious reasons this would not apply if there was a credit to the Consumption Deferral Account which would represent more water having been delivered than was forecast.

Rate Application paragraph 63 – contingency allowance: Considering that EWW says "that the majority of the costs are known for completed work" and that EWW now has considerable experience gained over the past 3 years concerning unexpected and unplanned costs for well projects outlined in RRA 2012-2014, we believe that a contingency factor of 20% is unreasonable and that 5% is ample for work remaining to be completed. FCRA recommends that this contingency be reduced.

Rate Application paragraph 91 – Capital Programs – Church Road Complex Upgrades: In the 2014 Master Plan KWL has indicated that EWW should install a magnetic flow meter which will provide useful statistical information on water supply production and ongoing well capacity analysis for a total cost of $84,000. This would appear to be a 'nice' add-on rather than a required upgrade.
EWW has stated that it is more cost effective to have local consultants carry out studies and prepare reports than it would be to have Edmonton based EWSI staff perform this function and travel to Parksville. We assume EWSI staff would therefore be capable and qualified to make this flow meter recommendation but would not need to be onsite in Parksville and are puzzled that EWW considers the meter to be necessary for this utility based on a local consultant's report. In other words, if this upgrade is required would EWSI not have already made the same upgrade to the other 36 utilities it operates? FCRA requests that the Comptroller eliminate this cost from the Application.

Application Table 1.4.1-1, residential comparison chart for 2015: FCRA tracks water rates for 14 utilities along the Oceanside coastal area from Nanoose to Union Bay. We attach same which has been updated in 2015 for 8 utilities but still requires updating for Parksville, Qualicum Beach and all RDN operated utilities after the 2015 budgets are approved at the end of March. We have been informed that RDN rates are proposed to increase by 2% while Qualicum Beach will not have an increase and Parksville may have a nominal increase in their parcel taxes.

In comparison to EWW we do not track Lantzville because as of October 2014 it receives it's water from the City of Nanaimo and has paid $1.2 million to buy into the Nanaimo municipal system. We also do not track RDN Melrose Terrace (28 connections), RDN Whiskey Creek (128 connections) and RDN Surfside (37 connections) because these utilities are extremely small and some costs distort their rates. We decided to include RDN Englishman River (138 connections) because it is close to the bottom of the range and is adjacent to Parksville, San Pareil and the Englishman River where the Englishman River Water Service Project is taking place.

By our chart you will see that EWW is lower than 4 utilities but higher than 9 others. The gap to the next lower utility at chart position 9 will increase significantly as the proposed EWW rates come into affect for 2016 and 2017. In fact, EWW will rise to chart position 13 out of 14 by 2017. We can confidently make this statement knowing that the present 4 higher cost utilities have already taken steps to upgrade their system infrastructure as can be seen by high parcel taxes and we have been informed they are not forecast to increase because the majority of funds has been spent and the debt incurred.

Summary

FCRA agrees that customers feel EWW provides reliable and consistent service, notwithstanding hard water issues and a few taste complaints in a portion of the system. But we also feel EWW is far too diligent and overzealous concerning the physical and performance expectations of this system which we believe is due to being primarily focussed on improving the value of their asset coupled with earning a profit on the proposed expenditures (per Financial Schedule 2.6) rather than providing water service at a more reasonable cost to EWW customers. EWW is too concerned with ensuring this utility meets "leading water utility standards" and proposes to load those costs on it's customers to attain this goal. An analogy might be to say EWW is polishing the car beyond what is required to operate it efficiently. EWW will no doubt take exception to these statements, however, they are in business to make a profit and enhance the value of their assets and not to do favours for residents in French Creek.

FCRA recommends that it is time to undertake a peer review of this utility considering what we believe are over-management and over-engineering activities by EWW.

Conclusion

The French Creek Residents' Association believes that EWW proposed rate increases should be held to 3% per year for a compound effect of 9.3% by 2017 over 2014 rates, not including the Rate Rider. EWW is proposing an increase of 12% per year or 40.5% by 2017 which is not acceptable.

COMPARISON OF RESIDENTIAL WATER RATES AND COSTS FOR OCEANSIDE WATER PURVEYORS

Prepared by the French Creek Residents' Association (revised Mar 4, 2015)

	Qual Bay	Town of	City of	Little Qual	RDN	Deep Bay	RDN Fr Crk	RDN	Bowser	Epcor	RDN	Ships Point	Fanny Bay	Union Bay
	/Horne Lake	Qualicum	Parksville	Water Dist	Englishman		(Sandpiper)	Nanoose		Fr Creek	San Pareil			
Billing calculation period	quarterly	monthly	semi-annual	quarterly	day	quarterly	day	day	quarterly	monthly	day	annual	triannual	bi-monthly
Base/min charge $	52.50	9.00	72.80	60.00	0.30	33.00	0.30	0.30	54.00	40.45	0.30	276.00	100.00	75.00
Base m³ units included	68	15	0	93	.31	0	.31	.31	40	15	.31	unlimited	120	20
Rate rider on base chge $	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	4.14	n/a	n/a	n/a	n/a
Rate above base m³ $	0.32	0.80	0.624	0.706	0.94	0.50	0.94	0.94	0.90	1.68	0.94	n/a	1.10	0.77
Rate rider per extra m³ $	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0.17	n/a	n/a	n/a	n/a
Second level extra m³ rate $	n/a	1.10	1.248	n/a	1.08	0.60	1.08	1.08	1.25	n/a	1.08	n/a	1.30	1.05
Parcel tax per year $	75.00	* 208.00	16.64	150.00	250.50	218.00	279.05	* 301.76	265.00	n/a	* 442.45	* 400.00	* 468.00	340.00
55 m³ 1/4ly usage cost $	71.25	87.00	94.64	97.50	115.43	115.50	122.56	128.24	133.75	**152.27**	163.41	169.00	192.00	216.75
	Chart 1	Chart 2	Chart 3	Chart 4	Chart 5	Chart 6	Chart 7	Chart 8	Chart 9	**Chart 10**	Chart 11	Chart 12	Chart 13	Chart 14

Note - with the exception of the RDN and Ships Point, all utilities have a base charge plus they bill for usage in excess of the base - call it 'base +'

The RDN disregards a base charge if average usage exceeds the daily minimum charge of $.30 - call it 'either or'

Parcel taxes for RDN properties include a 5.25% service fee for collecting taxes levied by the provincial Surveyor of Taxes

*** Epcor rate is interim until rate application decision**

* Parksville went to a complicated structure in 2013. Base charge and parcel tax + consumption cumulatively for each tier.

* Town of Qualicum parcel tax includes Arrowsmith Water Service costs which are nominal but unknown.

* San Pareil is funding a large capital replacement program

* Nanoose is repaying debt for a new water treatment plant

* Fanny Bay is retiring debt for storage tank replacement at $156 triannually

* Ships Point has a project ongoing for infrastructure replacements and upgrades

2015 updated to date - Epcor, Union Bay, Little Qualicum, Qualicum Bay/Horne Lake, Deep Bay unchgd, Fanny unchgd, Ships Point, Bowser unchgd,

Costs are based on average consumption of 55 m³ (cubic metres) per 1/4 or: 18.33 monthly, 36.67 bi-monthly, 73.33 triannually, 110 semiannually = 220 per year for a single family home