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LAND ACKNOWLEDGMENT

The lands on which Edmonton sits and the North Saskatchewan River that runs through it have been the sites of natural abundance, ceremony and culture, travel and rest, relationship building, making and trading for Indigenous peoples since time immemorial.

The City of Edmonton acknowledges the traditional land on which we reside is in Treaty Six Territory. We would like to thank the diverse Indigenous Peoples whose ancestors' footsteps have marked this territory for centuries, such as nêhiyaw / Cree, Dene, Anishinaabe / Saulteaux, Nakota Isga / Nakota Sioux, and Niitsitapi / Blackfoot peoples. We also acknowledge this as the Métis' homeland and the home of one of the largest communities of Inuit south of the 60th parallel. It is a welcoming place for all peoples who come from around the world to share Edmonton as a home. Together we call upon all of our collective, honoured traditions and spirits to work in building a great city for today and future generations.

The City of Edmonton owes its strength and vibrancy to these lands and the diverse Indigenous peoples whose ancestors' footsteps have marked this territory as well as settlers from around the world who continue to be welcomed here and call Edmonton home.



The City of Edmonton recognizes that, as settlers to this land, we must do better. Reconciliation begins with acknowledging historical traumas and current disparities. The City recognizes it needs to honour and respect its foundational relationship with the First Peoples of Canada. This will be accomplished through living the values of mutual respect, responsibility and renewal to build and maintain strong relationships between all City employees and Indigenous Peoples.

The Indigenous Framework has been built on years of dialogue with Indigenous communities, through formal and informal relationships with Elders, community Knowledge Keepers and Indigenous youth, as well as information gathering from research and discussions with municipal and community leaders, service providers and academic professionals. This important work is intended to answer the question:

"How can the City of Edmonton best support and build strong relationships with Indigenous Peoples in Edmonton?"

Through the adoption of this framework, it becomes the responsibility of each and every City of Edmonton employee to forge stronger relationships with the descendants of the original inhabitants of this land and to recognize we all have roles to play in our journey towards reconciliation. The framework is designed to be a living initiative that will change and adapt as our relationships grow and mature.

It is the responsibility of every employee to live out these four roles in their interactions with indigenous Peoples:

Listener: "We listen, with open hearts and minds, when Indigenous Peoples share their stories and experiences."

Connector: "We connect Indigenous Peoples to the programs, services, people and resources that enrich the community and foster relationships to create positive change."

Advocate: "We stand with Indigenous Peoples to create a safe and inclusive city where everyone is treated with dignity and respect."

Partner: "We work in partnership with Indigenous Peoples on initiatives to improve the physical, mental, spiritual and emotional well-being of Indigenous Peoples in Edmonton."



WASTE SERVICES UTILITY

Outcomes:

- Edmonton protects its natural environment, minimizes its environmental impact and mitigates climate change.
- The City of Edmonton's operations and service delivery sustains and conserves the environment.

Waste Services is progressing toward a more sustainable future that provides Edmontonians with strong economic and environmental benefits while ensuring utility rate increases remain stable and consistent. With a focus on waste reduction and increased waste diversion, the branch's actions will be directed at minimizing materials going to landfill. This will enable Waste Services to move towards the 90 per cent diversion goal set by City Council.



167,000 Multi-unit households serviced

Eco Stations weekends

BRANCH BY THE NUMBERS WASTE SERVICES



1 Reuse Centre

9 Annual Big Bin Events

500 Employees

2 Free Eco Station



Branch Services Delivered

Waste Collection

Curbside Residential Waste Collection - Waste collection from single unit homes.

Communal Residential Waste Collection - Waste collection from multi-unit buildings.

Litter Bin Collections - Litter bin collections from non-residential litter receptacles in Business Improvement Areas.

Non-residential Collection - Waste collection from City buildings and facilities.

Waste Drop-off - Waste drop-off services such as recycling depots and Eco Stations.

Waste Education and Outreach - Education and outreach activities for Edmontonians to inform and enable proper use of the Waste system.

Sustainable Waste Management

Commercial Self-haul - Landfill disposal of commercial material.

Construction and Demolition Waste Processing - Accepting and processing of residential and non-residential construction and demolition material by a third party.

Environmental Compliance Activities - Compliance with environmental regulation including odour monitoring, groundwater management and landfill management activities.

Organics Processing - Processing of residential organic waste.

Recyclables Processing - Processing of residential blue bag and blue bin recyclable material.

Refuse Derived Fuel Processing - Processing of residual waste material into fuel.

Residual Waste Disposal - Disposal of residual waste material, including material from black carts and black bins.

Sales and Support Services - Sales and marketing support for products and customers.

Key Actions for 2023-2026

The focus in the coming years will be on developing strategic programs described in the 25-year Waste Strategy that set the City on a path of transformational change under a broader framework of Zero Waste. The aim will be to continuously improve the waste system and expand performance indicators to capture the full social, environmental and operational benefits being achieved. Below is a summary of key initiatives over the next four years:

Prioritize Waste Prevention and Reduction

Ten waste reduction actions have been identified to further advance the City's three focus areas: removing barriers to zero waste innovation and circular economy initiatives; supporting Edmontonians in making the behavioral and operational shifts necessary to reduce waste; and increasing awareness of and participation in waste reduction programs.

Communal Three-stream Collection

City Council approved a Waste Services business case in 2022 proposing the implementation of mandatory three-stream source separated collection, mandatory co-location of waste streams and a targeted education program. The business case also included developing an approach to illegal dumping, variable rates, developer standards, updates to the Waste Services Bylaw, an excess waste program and regular waste characterization studies to support implementation of the ongoing program. These changes, with planned implementation from 2022 to 2026, are anticipated to increase the projected diversion rate by an additional eight per cent.

Landfill Gas Collection

In 2020, Waste Services secured a \$10 million Natural Gas Challenge grant from Emissions Reduction Alberta to support upgrades for the Clover Bar Landfill gas collection system as well as the construction of a landfill gas upgrader facility that will allow the City to convert landfill gas to renewable natural gas. The plant is expected to be operational in 2024 and is estimated to produce approximately 325,500 GJ of renewable natural gas annually.

Waste Innovation

The Alberta Clean Energy Technology Accelerator (ACETA) is a collaboration with the City of Edmonton, University of Alberta, Innotech Alberta and CanMet Energy with the purpose to provide a cost-recovered platform to pilot and upscale innovation in converting biomass, waste biogas, and natural gas into biofuel and other marketable products, and to create successful commercialization of these new value-added products. Over the next four years, this initiative will advance how Waste Services can improve processing, handling and supply of waste feedstock for the refuse derived fuel process, as well as create a research hub to be located at the Edmonton Waste Management Centre.

Single-use Item Reduction Strategy

Administration's proposed recommendations are to regulate the distribution of shopping bags, polystyrene foam food serviceware (cups, containers, bowls and plates), foodware accessories (e.g. utensils, straws, prepackaged condiments and napkins) and single-use cups (other than polystyrene foam). Overall, the City aims to reduce the number of regulated single-use items used in Edmonton by 20 per cent within four years.

Customer Relationship Management

The adoption of a new streamlined customer relationship management tool is underway. This tool will help Customer Support Centre staff record and search residents' waste information and enable them to manage inquiries more efficiently. This tool will help improve and enhance the customer experience and support the customer-centric approach.

Performance

	2020 Actual	2021 Actual	2022 Target	2026 Target	2023-2026 Desired Trend
Residential Diversion Rate ¹	18%	34%	40%	40%	7
Stable Rates	0.3%	0.0%	0.0%	0.9%	→
Curbside Organics & Recyclables Collected	13%	34%	55%	60%	7
Kg/Capita Residential Waste Generated	363	333	No increase from 2020 (363 kg)	No increase from 2020 (363 kg)	→

In 2021, the way Edmonton sorts, sets out and collects waste was changed. All single-unit and some multi-unit homes were provided with a garbage cart, a food scraps cart and a food scraps pail. The following are the Service Standards set out by Waste Services as part of this program:

- Recyclables (Blue Bag) every week
- Garbage (Black Cart) every two weeks
- Food Scraps (Green Cart) every week April to October, every two weeks November to March
- Yard Waste (seasonal collection) twice in spring and twice in fall

In October 2020, City Council approved the Material Recovery Facility Business Case which recommended advancing planned capital upgrades for the facility in 2022. These upgrades would be delivered in conjunction with the facility operation contract. The project is expected to increase processing efficiency, providing adequate capacity for the program's demands, operational cost savings, and an increased diversion rate of blue bag recyclable material of greater than 70 per cent. Design work is scheduled to begin in Q1 2022 with construction expected to occur in late 2022 and early 2023.

¹ With the approval of the Three-stream Communal Collection Business Case, diversion rate reporting and targeting will now include both curbside and communal collection. The Residential Diversion Rate is a blended single unit and multi-unit residential diversion rate. For reference purposes, the 2021 single unit diversion rate was 34% and the multi-unit diversion rate was 10% for a combined diversion rate of 27%.

Emerging Opportunities and Risks

Emerging Opportunities

Refuse Derived Fuel

Waste Services processes residual waste into Refuse Derived Fuel at the Edmonton Waste Management Centre. This product is an alternative fuel and provides green energy. Waste Services is exploring market opportunities to sell this product. This will increase the waste diversion rate and keep this material out of landfill.

Reduction / Regulation of Single-use Plastics

Waste Services will continue to engage with residents and businesses about reducing single-use items, including communications and outreach to raise awareness of the bylaw. Support programs such as toolkits, grants and technical assistance will also be delivered to help businesses meet and exceed the bylaw requirements.

Extended Producer Responsibility Program

The Government of Alberta is planning to implement Extended Producer Responsibility over the next few years. This will be a major shift in accountability and responsibility from the City to producers for the Blue Bag program and the Hazardous and Special Products program. Waste Services continues to work closely with the Government of Alberta and its municipal partners to ensure alignment of this initiative and preparedness for implementation.

Emerging Risks

Supply Chain Constraints

Inflation, high fuel prices and potential labour shortages causing higher production and transportation costs, as well as service impacts, could affect procurement plans and budget forecasts, therefore impacting the branch's ability to maintain service levels.

Potential Change in Regulations

Waste Services works closely with municipal partners, all levels of government and key players in the commodities market to ensure any potential changes in regulations that may impact local waste or recycling programs are quickly absorbed within the Utility.

Branch Summary by Program

Branch - Waste Services

2023-2026 Budget - Branch Summary by Program

(\$000)	2021 Actuals	2022 Projected	2023 Proposed	2024 Proposed	2025 Forecast	2026 Forecast
Revenue and Transfers						
Rate Revenue	199,145	206,076	212,407	218,247	221,986	225,465
Program Revenue	14,682	13,017	16,178	17,277	17,193	17,897
Grant Revenue	8,067	-	400	-	-	-
Total Revenue and Transfers	\$221,894	\$219,093	\$228,985	\$235,524	\$239,179	\$243,362
Net Expenditure and Transfers						
Collection Services	75,206	81,239	90,732	93,863	96,842	98,945
Sustainable Waste Processing	125,803	131,947	132,678	137,014	140,613	142,808
Grants	-	-	15	-	-	-
Total Net Expenditure and Transfers	\$201,009	\$213,186	\$223,425	\$230,877	\$237,455	\$241,753
Net Income/(Loss)	\$20.885	¢5 007	¢E ECO	\$ 4.647	¢4.724	\$4.600
Net income/(Loss)	\$20,000	\$ 5,907	\$5,560	\$4,047	\$1,724	\$1,609
Regulatory Adjustments for Rate Filing						
Add: Amortization of Regulatory Deferral Assets	3,906	3,906	3,906	3,906	3,906	3,249
Remove: Amortization of Contributed Assets	1,295	1,373	1,210	1,313	1,423	1,389
			•	,	,	
Net Income per Rate Filing	\$23,496	\$8,440	\$8,256	\$ 7,240	\$4,207	\$3,469
Full-time Equivalents	512.1	513.6	562.6	562.6	562.6	562.6

2023-2026 Budget - Branch Summary by Account Category

(\$000)	2021 Actuals	2022 Projected	2023 Proposed	2024 Proposed	2025 Forecast	2026 Forecast
Revenue and Transfers						
Rate Revenue	199,145	206,076	212,407	218,247	221,986	225,465
Program Revenue	14,682	13,017	16,178	17,277	17,193	17,897
Grant Revenue	8,067	-	400	-	-	-
Total Revenue and Transfers	\$221,894	\$219,093	\$228,985	\$235,524	\$239,179	\$243,362
Net Expenditure and Transfers						
Personnel	48,384	51,060	55,613	57,752	58,818	59,937
Materials, Goods, and Supplies	3,466	3,793	2,984	2,997	3,015	3,072
External Services	74,246	81,139	87,237	89,518	92,119	94,127
Fleet Services	13,961	15,727	16,169	15,676	15,676	15,654
Shared Services	9,715	10,083	10,417	10,523	10,622	10,727
Intra-municipal Charges	4,544	5,742	6,422	6,480	6,476	6,519
Utilities & Other Charges	12,408	16,069	10,184	10,434	10,676	10,864
Amortization	27,143	28,272	29,717	32,377	34,692	35,555
Debt	8,237	8,291	8,205	8,527	8,763	8,774
Grants	_	-	15	-	_	-
Subtotal	202,104	220,176	226,963	234,284	240,857	245,229
Intra-municipal Recoveries	(1,095)	(6,990)	(3,538)	(3,407)	(3,402)	(3,476)
Total Net Expenditure and Transfers	\$201,009	\$213,186	\$223,425	\$230,877	\$237,455	\$241,753
	400.005	AE 0.07	A5 500	A1 0.15	***	A
Total Net Operating Requirement	\$20,885	\$5,907	\$5,560	\$4,647	\$1,724	\$1,609
Regulatory Adjustments for Rate Filing						
Add: Amortization of Regulatory Deferral Assets	3,906	3,906	3,906	3,906	3,906	3,249
Remove: Amortization of Contributed Assets	1,295	1,373	1,210	1,313	1,423	1,389
Total Net Operating Requirement	\$23,496	\$8,440	\$8,256	\$7,240	\$4,207	\$3,469
Full-time Equivalents	512.1	513.6	562.6	562.6	562.6	562.6

Summary of Budget Changes - Net Requirement

, ,				
(\$000)	2023 Proposed	2024 Proposed	2025 Forecast	2026 Forecast
Previous Year's Budgeted Revenue	219,093	228,985	235,524	239,179
Customer Growth	4,488	3,905	1,758	1,493
Utility Rate Increase	1,843	1,935	1,981	1,986
Program Revenue Changes	3,161	1,099	(84)	704
Grant Changes	400	(400)	-	-
Total Proposed Budget Revenue	\$228,985	\$235,524	\$2 39,179	\$243,362
Previous Year's Budgeted Expenditures	213,186	223,425	230,877	237,455
Previously Approved Adjustments	-	-	-	-
Administrative Adjustments	-	-	-	-
Revised Base Budget	\$213,186	\$223,425	\$230,877	\$237,455
Existing Services (Incremental to Base)				
Cost Changes	6,523	3,875	3,030	794
Grant Expenditures	15	(15)	_	-
Efficiency & Cost Savings	(1,853)	(1,962)	(2,006)	(2,050)
Total Impact on Existing Services	4,685	1,898	1,024	(1,256)
Growth/New Services				
Customer Growth & Program Changes	5,554	5,554	5,554	5,554
Total Growth/New Services	5,554	5,554	5,554	5,554
Total Proposed Budget Expenditures	\$223,425	\$230,877	\$2 37,455	\$241,753
Net Income/(Loss)	\$5,560	\$4,647	\$1,724	\$1,609
Incremental Change in Full-time Equivalents	49.0	-	-	-

Details of Budget Changes

Revenue Changes

- Customer growth from 2023-2026 is forecast to be 1.3 per cent, 1.2 per cent, 1.1 per cent and 1.0 per cent, respectively.
- Proposed utility rate increase is 0.9 per cent in 2023 and 2024 and forecast to be 0.9 per cent in 2025 and 2026.
- Anticipated increase in program revenue from the addition of Commercial Collection revenue, which previously was shown as an interdepartmental expenditure, an increase in investment earnings and additional revenue from the Material Recovery Facility.
- Forecasted increase in grant funding from the Alberta Clean Energy Technology Accelerator (ACETA) Program. This one-time, third party grant is fully offset by an increase to external service costs.

Expenditure Changes

Existing Services (Incremental to Base)

- Increase costs attributed to Collection Service contracts, bin maintenance from the Edmonton Cart Rollout and impacts of inflation.
- Efficiency and cost savings made up of various budget reductions in Sustainable Waste Processing, Collections, Business Integration and Technical Services to align with Key Actions for 2023-2026.

Growth/New Services

- Increased costs attributed to forecast average customer growth from 2023-2026.
- Increased costs related to the implementation of the Communal Collection Program.

Incremental Change in Full-Time Equivalents

Increase in full-time equivalents related to the implementation of the Communal Collection Program, increase customer outreach and support, and operational performance analytics.

Pro-Forma Income Statement

(\$000)	2021 Actuals	2022 Projected	2023 Proposed	2024 Proposed	2025 Forecast	2026 Forecast
Revenues						
Rate Revenue	199,145	206,076	212,407	218,247	221,986	225,465
Program Revenue	14,682	13,017	16,178	17,277	17,193	17,897
Grant Revenue	8,067	-	400	-	-	-
Total Revenue	\$221,894	\$219,093	\$228,985	\$235,524	\$239,179	\$243,362
Expenses Operating and maintenance Intra-municipal recoveries	166,724 (1,095)	183,613 (6,990)	189,026 (3,538)	193,380 (3,407)	197,402 (3.402)	200,900 (3,476)
Amortization of tangible capital assets	27,143	28.272	29.717	32,377	34.692	35,555
Interest Grants	8,237	8,291	8,205 15	8,527	8,763	8,774
Total Expense	\$201,009	\$213,186	\$223,425	\$230,877	\$237,455	\$241,753
	400.005	AE 0.07	A5 500	A1 0.17	A4.704	A4 000
Net Income/(Loss)	\$ 20,885	\$ 5,907	\$5,560	\$4,647	\$1,724	\$1,609
Opening Retained Earnings	103,561	123,151	127,685	132,032	135,366	135,667
Net Income	20,885	5,907	5,560	4,647	1,724	1,609
Remove: Amortization of Contributed Assets	1,295	1,373	1,210	1,313	1,423	1,389
Ending Retained Earnings	\$123,151	\$127 ,685	\$132,035	\$ 135,366	\$1 35,667	\$1 35,887

Pro-Forma Balance Sheet

(\$000)	2021 Actuals	2022 Projected	2023 Proposed	2024 Proposed	2025 Forecast	2026 Forecast
Assets						
Cash	83,483	76,463	45,451	40,867	28,400	32,762
Other current assets	23,511	23,511	23,512	23,511	23,511	23,511
Total Assets	\$106,994	\$99,974	\$68,963	\$64,378	\$51,911	\$56,273
Libilities						
Other liabilities	50,773	50,773	50,772	50,773	50,773	50,773
Landfill closure and post-closure care	45,560	50,759	33,609	31,953	16,398	16,143
Long-term debt	235,454	223,131	224,124	224,493	220,967	212,612
Total Liabilities	\$331,787	\$324,663	\$308,505	\$307,219	\$288,138	\$279,528
Net Financial Assets (Net Debt)	(\$224,793)	(\$224,689)	(\$239,542)	(\$242,841)	(\$236,227)	(\$223,255)
Non-Financial Assets						
Contributed tangible capital assets	21,104	20,062	24,612	24,540	23,117	21,728
Non-contributed tangible capital assets	298.055	307,433	325,991	336,600	335,617	327,502
Regulatory deferral assets	26,050	22,144	18,238	14,332	10,425	7,177
Inventory of materials & Supplies	2,735	2,735	2,736	2,735	2,735	2,735
Total Non-Financial Assets	\$347,944	\$352,374	\$371,577	\$378,207	\$371,894	\$359,142
Retained Earnings	\$123,151	\$127,685	\$1 32,035	\$1 35,366	\$1 35,667	\$135,887

Proposed 2023-2026 Capital Budget

Capital Projects	2023 Proposed	2024 Proposed	2025 Proposed	2026 Proposed	2023-2026 Total	2027 & Beyond	Total for Approval
оприм годово	TTOpodod	ТТОросси	Порозоц	ТТОрозос	Total	Doyona	пррготаг
Branch-wide							
Waste Services Facilities, Infrastructure and							
Process Equipment	4,235	6,788	5,275	3,111	19,409	-	19,409
Waste Services IIS Infrastructure Planning							
and Design	1,075	890	188	120	2,273	-	2,273
Waste Services IIS Infrastructure Delivery	1,950	7,123	6,326	5,103	20,502	-	20,502
	7,260	14,801	11,789	8,334	42,184	-	42,184
Collection Services Facilities							
Mayfield (NW) Eco Station *	6,075	6,925	-	-	13,000	-	13,000
	6,075	6,925	-	-	13,000	-	13,000
Sustainable Waste Processing Facilities							
Materials Recovery Facility (MRF) Renewal *	-	-	-	-	-	-	-
Landfill Gas to Renewable Natural Gas (RNG) *	(100)	1,998	-	-	1,898	-	1,898
HSADF Digestate Screening and Mixing System	5,800	-	-	-	5,800	-	5,800
	5,700	1,998	-	-	7,698	-	7,698
Vehicles & Equipment							
Waste Containers	3,383	4,016	4,231	4,501	16,131	-	16,131
Waste Services Fleet Assets	6,735	9,763	9,569	8,181	34,248	-	34,248
Waste Services Fleet Assets (Pre-approved in							
Sept 2022)	5,100	5,730	-	-	10,830	-	10,830
	15,218	19,509	13,800	12,682	61,209	-	61,209
Waste Program Changes							
Three-stream Communal Collection	7,323	1,525	1,548	-	10,396	18,614	29,010
	7,323	1,525	1,548	-	10,396	18,614	29,010
December and ad 2022 2020 Capital Budget							
Recommended 2023-2026 Capital Budget Approval	\$41,576	\$44,758	\$27,137	\$21,016	\$134,487	\$18,614	\$153,101
•							
Cash Flow Adjustment							
Mayfield (NW) Eco Station *	(6,075)	(6,925)	-	-	(13,000)	13,777	777
Materials Recovery Facility (MRF) Renewal *	4,606		-	-	4,606	-	4,606
Landfill Gas to Renewable Natural Gas (RNG) *	9,775	1,318	-	-	11,093	-	11,093
	8,305	(5,607)	-	-	2,698	13,777	16,475
Profile Pending Approval							
Energy Transition and Climate Resilience **	250	1,167	2,667	3,174	7,258	-	7,258
	250	1,167	2,667	3,174	7,258	-	7,258
Total Forecast Per 2023-2024 Waste Services	Aravas	A 10 0 10	Ann ne -	Ans yes		400.004	A 170 00 1
Utility Rate File	\$50,131	\$40,318	\$29,804	\$24,190	\$144,443	\$32,391	\$176,834

^{*}Refer to Attachment 3 of CO01380 for a description of differences between the Capital Budget and the Capital Forecast in the 2023-2024 Waste Services Utility Rate Filing.

Financial Indicators

(\$000)	2022 Projected	2023 Proposed	2024 Proposed	2025	2026
(3000)	Projected	Proposed	Proposed	Forecast	Forecast
Rates Sufficient to Meet Expenditure and Cash					
Flow					
Net Income per Rate Filing (\$000)	\$5,907	\$5,560	\$4,647	\$1,724	\$1,609
Target: Positive Net Income	Yes	Yes	Yes	Yes	Yes
Cash Position (\$000)					
Pay As You Go Requirement	22,447	16,461	9,757	8,302	11,997
Risk Allowance	3,637	1,738	1,715	1,789	1,715
Target: Cash Position	26,084	18,199	11,472	10,091	13,712
Cook Desition (\$000)	76,463	45,451	40,867	28,400	32,762
Cash Position (\$000)					
Actual Cash >= Target	Yes	Yes	Yes	Yes	Yes
Residential Customer Rate Impacts					
Curbside					
Monthly Billing Increase	\$ -	\$0.43	\$0.44	\$0.44	\$0.45
Impact of Customer Rate	_	0.9%	0.9%	0.9%	0.9%
Monthly Unit Rate (240L Cart)	\$48.32	\$48.75	\$49.19	\$49.63	\$50.08
Communal					
Monthly Billing Increase	\$ -	\$0.28	\$0.28	\$0.28	\$0.28
Impact of Customer Rate	_	0.9%	0.9%	0.9%	0.9%
Monthly Unit Rate	\$30.69	\$30.97	\$31.25	\$31.53	\$31.81
Target: Stable, consistent rate increases	Yes	Yes	Yes	Yes	Yes
Financian of Capital Investments					
Financing of Capital Investments Debt Services Coverage Ratio				4	4= ==:
	12.8%	12.7%	13.1%	13.5%	13.6%
Target: No greater than 22%	Yes	Yes	Yes	Yes	Yes