

Council Policy No.:	CP2017-006
Council Policy Name:	High Bill Adjustment Policy
Date Approved by Council:	April 18, 2017
Date revision approved by Council:	September 24, 2019
Related SOP, Management Directive, Council Policy, Forms	

Policy Statement and Rationale:

This Policy establishes the expectations of Council relating to a high bill inquiry.

Scope:

This policy covers various types of high consumption water and wastewater bills and how to address customer concerns.

Policy:

1. Definitions:

- 1.1 **“High Bill”** is a bill that is 2 x the normal consumption for the same period in the previous year based upon average daily consumption.
- 1.2 **“Leak”** means an unintentional water loss that is caused by circumstances beyond the control of the property owner (eg. broken and/or malfunctioning pipes within a residence or building). A leak occurs when there is a failure on the plumbing system to do what it was designed to do.
- 1.3 **“Unoccupied”** means a dwelling and/or building in which occupants are absent from the property for a time period of seventy-two (72) hours or more.
- 1.4 **“Vacant”** means regardless of the presence of furnishings, a vacant dwelling and/or building is one that is not used by an owner/lessee or is not occupied by an owner/lessee. A newly constructed dwelling and/or building is also considered to be vacant after it is completed and before the occupants move in.

2. General

2.1 A high bill can be a result of:

- A reading error
- A period of increased consumption
- An estimated bill that is higher than the actual consumption
- A catch up bill following one or more estimated bills
- A final meter reading from an existing meter where a new water meter is being installed
- Obvious or hidden leaks
- A malfunctioning water meter
- Installation of a new meter
- Mis-matching of registers and meters

2.2 Pipes and infrastructure after a water meter are on private property and is not a municipal responsibility.

2.3 Plumbing must be in compliance with government regulations.

2.4 By-law 2018-039, A By-law to Regulate Water and Wastewater Services, Section 10.03(i) provides authority to adjust accounts where the meter is not registering or not registering correctly.

2.5 Estimated readings are used where an actual reading cannot be obtained due to:

- Staff availability
- No reading available due to faulty equipment

2.6 Estimated readings will not be used when an actual water meter reading is available and is higher than a normal reading as it masks potential issues that may not be identified until subsequent bills.

2.7 An estimated reading is identified on the bill.

2.8 Staff shall assist the customer in identifying the cause of a high bill.

2.9 The following circumstances will not qualify for an adjustment to an account:

- Water loss, resulting in high consumption, from circumstances within the control of the property owner. Examples of such circumstances are, but not limited to, obvious or hidden leaks in the following:
 - Plumbing fixtures (taps, toilets, etc)
 - Water softeners
 - Irrigation system
 - Icemakers
 - Water powered sump pumps
- Water loss due to theft, vandalism or construction damage, as the responsibility to resolve these issues lies with the customer
- A leak was caused by a third party from whom the customer is able to recover their costs
- A dwelling and/or building is Unoccupied and/or Vacant for 72 hours or more
- Costs can be recovered through an insurance claim

3. A Reading Error

3.1 Occasionally a reading error will occur and result in a higher than normal bill for a customer. When this happens the correct reading shall be entered and the customer will be notified of the adjustment if applicable.

3.2 Where the reading error was a prior period resulting in a low bill and then a higher bill in the subsequent billing cycle, the customer will be provided the details of the error, and if requested, will be provided an extended period of time to pay the higher bill without late payment charges. Repayments should not extend beyond 6 months.

4. Period of Increased Consumption

4.1 Reasons for periods of increased consumption include but are not limited to:

- Seasonal Use:

- Watering of sod and/or gardening
- Filling of swimming pools or whirlpools
- Washing vehicles
- Use of irrigation systems
- Building of ice rinks
- Visitors
- Increase in the number of days in the billing period
- Neglect of private property

4.2 The uses denoted above **do not** constitute a reason for an investigation of a high bill.

5. Estimated Bill Higher than Actual Consumption

5.1 An account that has been estimated shall be adjusted to reflect actual consumption:

- When the customer provides the City with a meter reading when estimated readings were used for billing purposes; or
- After the water meter and remote reading equipment has been inspected and repaired or replaced in the case of faulty readings and notices have been left for repair.

5.2 If there is no response to the first request to inspect and repair or replace within 90 days, estimates will continue in accordance with the By-law to Regulate Water and Wastewater Services.

5.3 If it is determined when the meter is inspected and repaired or replaced, that the meter was malfunctioning, estimates shall remain as billed unless the estimate is not comparable to normal usage for historical billing periods where actual reads were available.

6. Catch Up Bill

6.1 When previous bills have been estimated and the subsequent bill is an actual reading no adjustment shall be provided.

- 6.2 Where the catch up bill is more than two times the normal consumption based on the 5 year average, if requested, an extended period of time to pay the higher bill without late payment charges will be provided. Repayments should not extend beyond 6 months.

7. Final Meter Reading from Replaced Water Meter

- 7.1 Where there is a discrepancy between the outside reader and the water meter and the reading is based upon the Touch Read Technology (TRT) the discrepancy could be a result of communication error between the water meter and the TRT device due to environmental factors.
- 7.2 Where the difference results in a water bill of more than 2 times difference than the daily average for the previous 5 years, the adjustment calculation used in relation to Section 11.0 will be applied.

8. Malfunctioning Water Meter

- 8.1 If a water meter has been sent for testing and it has been determined the meter has been over registering and exceeding the limits established in By-law 2018-039 the water bill in question shall be recalculated to reflect the amount of the overcharge or where a recalculation cannot be reasonably made the charge shall be adjusted to reflect the flat rate water and/or sewer charges as defined by By-law.

9. Installation of a New Water Meter

- 9.1 Old water meters may not capture consumption due to under or un-registering the consumption and the new water meter will now be accurately measuring the consumption.
- 9.2 No adjustment will be made as the water meter is correctly measuring the water consumed at the property.

10. Mismatching of Registers and Water Meters

- 10.1 Water meters and registers are matched when delivered to the City and accounts are set up indicating the unit of measure for billing purposes.
- 10.2 When it has been identified the register attached to the water meter does not match the size of the water meter or the unit of measure is incorrect the situation will be corrected.
- 10.3 Where it has been identified the unit of measure has been recorded incorrectly the situation will be corrected and adjustments made.

- 10.4 If the mismatch results in a credit to the property owner the account will be adjusted back to the date of the installation of the water meter.
- 10.5 If the mismatch is in favour of the municipality an adjustment will be made for the previous 2 year period.

11. Obvious or Hidden Leaks

- 11.1 This policy applies to all property types where an obvious or hidden leak has occurred, causing high consumption, due to circumstances beyond the control of the property owner and do not include circumstances identified in Section 2.9 of this policy.
- 11.2 Reasonable effort to locate the leak and initiate repairs must be taken by the customer within 30 calendar days upon notification from the City of increased water usage.
- 11.3 Notification may include, but is not limited to:
- Water billing with higher than historical average consumption
 - A written notice delivered to the owner or occupant
 - A courtesy phone call
- 11.4 To qualify for an adjustment water usage must exceed 2 times (200%) the average daily consumption of the similar period from the previous 5 years (not including estimated readings).
- If history is not available for the previous 5 years, available history will be used in the calculation.
 - If no history is available the cubic metres used in the calculation of the flat rate water charges will be used as the average.
- 11.5 The customer must provide sufficient documentation of repairs.
- 11.6 Notification to the City is required within 14 calendar days after the date of the final repair(s).
- 11.7 The customer's account must be in good standing at the time of submission.
- 11.8 The adjustment shall be in the form of a credit applied to the account.

- 11.9 Adjustments shall be issued after repairs have been completed and verification water usage at the location has returned to normal.
- 11.10 Failure to request a review within 60 days of initially being notified of the high consumption waives the customer's opportunity for an adjustment.
- 11.11 The customer is consenting to the City or its representative the right of access to the property for the purpose of an inspection to determine whether the issue resulting in high consumption was repaired within the required timeframe.
- 11.12 The City reserves the right, in circumstances below, to process adjustments after consultation with the Director of Public Works:
- Where the water meter has been tested and found to be measuring water consumption within prescribed standards for accuracy and is otherwise free from defects that could affect the measuring of water consumption; and no other City activity could have reasonably caused, in the determination of the Director of Public Works or designate, the increase in recorded water consumption.
 - Where the increase in recorded water consumption, in the determination of Director of Public Works or designate cannot reasonably be attributed to an act or omission of the customer, an occupant of the property or a person within the customer's or occupant's control; or a leak or other defect in the private plumbing system of the customer's property.
 - Where the customer provides to the City, at the customer's cost, written verification from a licensed plumbing contract, that the private plumbing system of the property is free from leaks or other defects that may affect water consumption and that upon careful inspection of the system there are no other factors that may explain the increased consumption.
- 11.13 The adjustment will be calculated as 50% of the difference between the high water bill and the average consumption, to a maximum of \$1,500 as per Section 13.1.
- 11.14 A maximum of one billing cycle (3 months) will be adjusted.
- 11.15 Wastewater reductions will be calculated in the same manner.

12. Payments

- 12.1 There is no extension of the due date or the time for paying water and/or wastewater bills because of a pending adjustment request.

12.2 Late payment charges will only be adjusted in relation to the adjustment provided for the leak or where readings have been estimated for an extended period of time resulting in a large reconciliation bill.

13. Adjustment Cap

13.1 Adjustments under this policy will be capped at \$1,500 for all properties.

14. Frequency of Adjustments

14.1 Property owners are responsible for ensuring there is no repetition of this occurrence. As such, only one leak adjustment per property during the term of the applicant's ownership of the property shall be permitted.

Revision History:

Proposed Date of Review:

Revision	Date	Description of Changes	Requested By
0.0	01/20/2021	Updated Policy Template	