



Sunshine Valley Ratepayers Association

P.O. Box 2104
Hope, BC V0X 1L0

October 22, 2006

Water Use Planning and Utilities Regulations

Secretary to the Comptroller

PO Box 9340 Stn Prov Govt
Victoria, BC
V8W9M1

Attention: Rick Couroux:

Tel: (250) 387-6355

via Email: Rick.Couroux@gov.bc.ca

RE: Public meeting / hearing for Sunshine Valley Water Customers

The Sunshine Valley Development Ltd. (SVDL) detailed document delays are both unacceptable and call into question the due diligence of what a reasonable person in this capacity would be expected to do.

SVDL has made recent upgrade requests in the amount of \$250, 505 with no evidence of previous work or receipts for work and equipment to complete the prior jobs. It would be expected that all monies have line items as to where the allocations went and how the system benefited from such allocations. Further, this community would argue that the majority of this cost will be wrapped in 'labor and maintenance' to which no transparency, in depth – or even formal documentation exists. The 8500.00 to 9000.00 per month currently being collected has not been adequately justified.

There does not appear any in-line constituent monitoring of the chlorine residuals and we would like to know if such a system is in place – or not. We would also like to see titration records that include calibrations made and if levels have either exceeded or fallen short of acceptable levels to ensure compliance. Further, we need to determine if the hypo injection system has redundancy.

To date there have been no apparent increase /transparent improvements / maintenance on the system. No visible activity for hydrant / stand pipe maintenance during the past 18

months. Community members speculate the majority of the funding is 'written off' as labour and not allocated in a due diligent manner.

If there is no constituent monitoring that is logged, monitored and relayed to an alarm system, the utility owner can only depend on customer complaints or random operator attendance. I can assure you that 'customer complaints' in respect to detailed submissions to your office have not been taken seriously by this owner. Yet SVDL remains in a profitable position as a result of the rate increase.

We have seen no detailed accounts SVDL in respect to responding to all community concerns and requests made by your office. Compliance and due diligence issues must be looked into and addressed by your office as part of your offices mandate in ensuring timely response to your requests. To date, we have recognized your patience, yet we would encourage your office instill immediate measures to ensure your requests are delivered without delay or that you will begin to levy penalties to the utility owner. We would request that your office 'hold back' the entire rate increase – or a portion of the increase deemed acceptable by your office to ensure it is being allocated on necessary upgrades and not wrapped up into labour costs that go undocumented or justified.

The customers of this community have exercised incredible patience yet have now waited for over 18 months for the due process within the interim rate increase application. During this period numerous concerns, issues and requests have been forwarded to SVDL – none of which have adequately satisfied your office or the concerns of the community. The point form letter received in June 2006 from SVDL did not answer any of the concerns raised from the customers with any documentation or clarity.

This delay is most frustrating and totally disrespectful to the process, your office and the paying customers. The water paying customers of this community look to your office for immediate remedy as we are put into the position of asking / demanding / clarifying concerns that are really a matter of your office and not ours. The SVRA has been pulled into this issue to the extent that other SVRA community initiatives are being delayed due to the amount of time being spent on this issue. This association does not like being put in place of 'watch dog'; this responsibility must be accepted by your office.

Customer confidence in the regulatory enforcement of your office is now being questioned. The SVRA does not have the answers – SVDL does. We have been requested to consider taking this issue up with the Minister of Environment; before this issue balloons up to the attention of the Minister of Environment, we request that your office provide the following information prior to the commencement of public meeting (s):

1. Issue an order for an independent engineering inspection to address sustainability of the system,
2. Conduct a personal visit or a delegate to this site and tour the entire water utility from intake to tap. I have personally been contacted and SVDL has agreed to allow the SCCC president and myself to tour the entire system – this is a positive step.

- a. Ensure constituent monitoring and injection redundancy is in place and the alarm systems are adequate for alerting SVDL of constituent collapse or spike;
 - b. Ensure regulatory compliance in respect to confined space regulations are being met (WorksafeBC);
 - c. Provide the date of the reservoir cleaning / disinfection and obtain all documentation for procedures and entry by SVDL staff or contractors;
 - d. Ensure that the work SVDL says has been done – has indeed been done re: provide detailed documentation on the maintenance of the entire water system which would include the hydrant maintenance;
3. Copy of the revised SVDL tariff application;
 4. Complete and independently audited accounting records;
 5. Copy of operator certification/s;
 6. Clear documentation that illustrates that Trite Creek water license is not part of the Huckleberry water system which is locate 3km across the valley with Hwy #3 separating the sites.

The SVRA also requests that you consider denying any further time extensions for the deliverables you have requested; there has been enough time. What is occurring now is paramount to unwarranted delays. To quote your website:

“With increasing population, industrial, and agricultural growth and the potential impacts of climate change, now more than ever, we need to be planning and protecting our water resource to ensure it is sustainable for future generations”. We wholeheartedly agree to your values.

We look forward to your response to the concerns highlighted in this and the various previous documents sent to your office.

Sincerely,

Richard Gagnon
2006 President, Sunshine Valley Ratepayers Assoc.

Cc Fraser Health, 'martin.macleod@fraserhealth.ca' (Water Testing)