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April 20, 2020

BCUC File 63367

Via email

British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, British Columbia V6Z 2N3

Attention: Patrick Wruck, Commission Secretary

Dear Mr. Wruck:

Re: Corix Multi-Utility Services Inc. – Application for Tariff Changes due to COVID-19

Corix Multi-Utility Services Inc. hereby submits this application seeking approval of tariff changes designed to ease the current financial burden for utility customers negatively impacted by the COVID-19 pandemic, while also complying with BCUC directives related to the COVID-19 pandemic.

Please contact RegulatoryAffairs.Canada@corix.com, or Errol South at (604) 928-9933, if you have any questions.

All of which is respectfully submitted,

Corix Multi-Utility Services Inc.

Per:

Errol South
Senior Regulatory & Financial Analyst, Energy Services Canada

Corix Multi-Utility Services Application regarding Customer Relief due to COVID-19

1. About Corix

Corix Multi-Utility Services Inc. (“**Corix**”) is a wholly owned subsidiary of Corix Infrastructure Inc. (“**CII**”), which is a fully integrated provider of utility infrastructure solutions throughout North America that include energy, water, and wastewater projects. CII has a 100-year history of developing, financing, constructing, operating, and maintaining a range of multiutility infrastructure for its customers pursuant to a variety of delivery and governance models. CII and its subsidiaries are responsible for the operation and maintenance of over 25 in-service energy systems, ranging in size, scope and technology from large-scale combined heat and power and chilled water plants to low temperature geo-exchange based systems. Corix owns and operates the following energy utilities regulated by the BCUC.

Table 1: CMUS BCUC-Regulated Utilities and Number of customers

No.	Utility	No. of Customers at Dec 31, 2019
1	Dockside Green Energy Utility (“ DGE ”)	7 customers (serving 341 units)
2	Burnaby Mountain District Energy Utility (“ BMDEU ”) ¹	11 customers (serving 1,053 units)
3	Neighbourhood District Energy System (“ NDES ”) at the University of British Columbia (“ UBC ”)	8 customers (serving 1,176 units)
4	Sun Rivers Gas	640 customers
5	Sun Rivers Electric	935 customers
6	Sonoma Pines Gas	496 customers
7	Sonoma Pines Electric	498 customers
8	Panorama Propane	240 customers

DGE, BMDEU and UBC NDES are regulated as Stream B thermal energy systems as determined by the BCUC Thermal Energy System Regulatory Framework Guidelines (“**TES Guidelines**”).

2. Coronavirus (COVID-19) Pandemic

On March 11, 2020, the World Health Organization (“**WHO**”) made the assessment that COVID-19 be characterized as a pandemic. COVID-19 is the infectious disease caused by the most recently discovered coronavirus. This new virus and disease were unknown before the outbreak began in December 2019.² Coronaviruses are a large family of viruses which are known to cause respiratory infections in humans ranging from the common cold to more severe diseases such as Middle East Respiratory Syndrome (MERS) and Severe Acute Respiratory Syndrome (SARS).

The Government of Canada enacted legislation and issued orders and regulations in order to ensure public safety throughout the COVID-19 pandemic. Among other things, these orders and regulations restrict entry to Canada at international borders and impact domestic air travel and intercity passenger rail carriers. Furthermore, federal, provincial, and territorial health officials and experts are working together to develop and

¹ The BMDEU is designed to serve two distinct customer groups: (i) the customers of the UniverCity residential neighbourhood; and (ii) the Simon Fraser University (“**SFU**”). SFU has not connected and will not connect to the BMDEU until the completion of the biomass central energy plant. Therefore, the current customer count for the BMDEU represents only the customers at UniverCity.

² [World Health Organization, Q&A on coronaviruses \(COVID-19\), March 9, 2020.](#)

disseminate guidance to ensure a coordinated and consistent approach to the COVID-19 outbreak. Among other things, the guidance covered infection prevention and control, surveillance, and how to reduce the spread of disease in community settings such as schools, workplaces and mass gatherings. This guidance plays an important role in the provincial and territorial responses to the COVID-19 pandemic.

On March 18, 2020, the Province of British Columbia (“**BC**”) declared a provincial state of emergency to support the provincewide response to the COVID-19 outbreak. This declaration was made based on a recommendation from BC’s health and emergency management officials, after BC’s provincial health officer declared a public health emergency on March 17, 2020.³

In a Provincial State of Emergency, the Provincial Health Officer can issue Orders as needed. In an effort to prevent COVID-19 from spreading and overwhelming the resources of the healthcare system in BC, the Provincial Health Officer issued orders, notices and guidance to organizations, industry sectors, businesses, faith-based institutions and the general public.⁴ These orders established containment policies and practices throughout the province with a focus on physical distancing and self-isolation. These orders, notices and guidance resulted in certain types of businesses closing for the duration of the pandemic, while others were required to adjust their operations in order to be compliant. As such, some businesses began to lay off workers, while others reduced salaries. The measures designed to contain and the limit the spread of COVID-19 and keep British Columbians safe are negatively impacting many utility customers’ financial situations.

Cognizant of the financial burden faced by its customers, Corix has taken action to suspend customer disconnections and seeks approval from the BCUC for actions meant to strike a balance between alleviating the financial burden faced by customers due to COVID-19 and maintaining a financially viable energy utility.

3. BCUC Actions regarding the COVID-19 Pandemic

Prior to the date of this letter, the BCUC issued three letters to all regulated utilities in response to the COVID-19 pandemic. These letters were L-13-20, L-16-20, and L-20-20. Relevant directives are included in the excerpts below.

L-13-20, dated March 20, 2020

In L-13-20 the BCUC stated:

“The BCUC understands that this Pandemic greatly impacts utility customers across British Columbia. As such, given these very difficult circumstances, all BCUC regulated public utilities are directed to suspend any customer disconnections for matters other than safety, for a minimum of 90 days from the date of this letter. The 90-day period could be further extended at the discretion of the BCUC.

We know this is a difficult time for customers and utilities alike and we are prepared to take immediate action to review utility requests to facilitate flexibility, particularly with respect to billing and collection processes as customers may be experiencing financial challenges due to the Pandemic.”⁵

L-20-20 on March 31, 2020

In L-20-20 the BCUC stated:

“Given these difficult circumstances, the BCUC understands that utilities may not be able to conduct in-person meter reading for all customers at this time due to safety and operational concerns. As such, any public utilities regulated by the British Columbia Utilities Commission (BCUC) that are unable to estimate billings within their endorsed tariff Terms and Conditions are granted relief from meter reading, when necessary, for the duration of the State of Emergency in the Province of British Columbia and while social distancing practices remain in place.

³ [BC Government News, “Province declares state of emergency to support COVID-19 response”, March 18, 2020.](#)

⁴ [Office of the Provincial Health Officer, COVID-19 \(Novel Coronavirus\).](#)

⁵ BCUC Letter L-13-20, dated March 20, 2020.

In place of meter readings, when necessary, energy consumption may be estimated from best available sources and evidence for billing purposes. When the next actual meter reading is completed, customers' bills must then be adjusted for the difference between estimated and actual use over the interval between meter readings.

Also, the BCUC is aware of an increase in cyber-related attacks on utilities and their customers at this vulnerable time. We ask you to remain diligent in protecting your utility assets and, when possible, please communicate with your customers and alert them to the risk of phishing attempts impersonating the Utility.”⁶

4. Corix Compliance with BCUC Letters

A. No Disconnections

Considering the financial challenges for customers due to COVID-19, Corix announced on March 10, 2020 that effective immediately, Corix “will be suspending water and energy service shutoffs for delinquent payments in all its U.S. and Canadian business units.”⁷ Additionally, Corix would “begin reconnecting service to those customers who are currently not receiving water or energy service due to lack of payment on delinquent accounts.”⁸ On March 23, 2020 Corix announced that the suspension of disconnections and late fees would continue until further notice.⁹ L-13-20 specified a 90-day period, which ends on June 18, 2020. Corix confirms that it will remain compliant with L-13-20 or any subsequent BCUC directive extending the time period for the suspension of disconnections for matters other than safety.

B. Meter Readings and Bill Estimates

Corix will estimate bills, if and when necessary, in order to comply with the BCUC's directive regarding meter reading and bill estimates and while social distancing practices remain in place. Once social distancing guidelines are relaxed Corix will read these meters and make the necessary adjustments to any estimated bills. Corix has also issued a warning to customers on its website regarding scammers and fraudulent individuals impersonating the utility.¹⁰

5. Approvals Sought

Corix seeks BCUC approval pursuant to section 60 of the *Utilities Commission Act* (“UCA”) as follows:

1. Corix requests approval to temporarily suspend the existing Late Payment Charge (“LPC”) clause in the tariff for each of the utilities included in Table 1 until June 18, 2020, which is 90 days after L-13-20. Appendix I provides the existing LPC terms for each utility included in Table 1.
2. Corix requests approval to cease the suspension of the LPC clause in the tariff for each of the utilities in Table 1, on the day after June 18, 2020.
3. Corix requests that any subsequent direction to its public utilities by the BCUC regarding suspension of disconnections automatically change the date in items 1 and 2 above from June 18, 2020 to any other date directed by the BCUC. For example, should the BCUC extend the suspension of disconnections to June 30, 2020, the date referred to in items 1 and 2 would automatically change to June 30, 2020.
4. Approval to establish a “COVID-19 Deferral Account” for each utility to attract carrying costs in a non-rate base deferral account. The carrying cost would be calculated and applied on a monthly basis at

⁶ BCUC Letter L-20-20, dated March 31, 2020.

⁷ Corix News Website, COVID-19: Corix announces suspension of water and energy shutoffs, March 10, 2020.

⁸ Ibid.

⁹ Corix News Website, COVID-19: Suspension of Water and Energy Shutoffs and Late Fees Extended, March 23, 2020.

¹⁰ Corix News Website, COVID-19: Keeping you informed about the essential utility services you rely on every day, April 8, 2020.

Corix's cost of capital. Corix will file an application to propose recovery of each COVID-19 deferral account when the balance stabilizes.

5. Approval to record in the COVID-19 Deferral Account for each utility:
 - a. The difference between revenue billed and revenue collected on a monthly basis from the issuance of the first bill after Corix and BCUC announced the suspension of disconnections (bill for March 2020 sent in April 2020), through to the end of the COVID-19 pandemic.
 - b. Subsequent payments by customers for bills previously not paid during the COVID-19 pandemic after practical bill collection efforts. The net amount remaining in the deferral account after the inclusion of item a and this item b would represent the total unrecovered revenue due to COVID-19 ("bad debts"). This represents bills that were not paid during the pandemic and subsequently not collected through practical collection efforts.
 - c. Incremental costs related to the COVID-19 pandemic. At this time, it is unknown the quantum or nature of these costs. These costs may include additional costs related to supplies including personal protective equipment; additional labour or contractors to service customers in the pandemic including customer service, customer communications, and operational crews; incremental administrative support; and emergency callouts. Where possible, incremental costs would be directly attributed to a utility as incurred. Since Corix operates in a multi-utility environment some incremental joint costs may be allocated to each utility.
6. Approval for each utility, in its discretion, to implement a flexible payment plan for customers with outstanding balances. Each utility may implement a flexible payment plan on a case by case basis or implement a standard repayment schedule. At this time, it is too early to gauge the magnitude and persistence of the pandemic and how it will affect customer's ability to pay. The proposed flexibility will allow each utility to tailor a response suitable for the circumstances of each utility's customer needs and how best the utility can provide customer support.

Upon future assessment of the balance in the COVID-19 deferral accounts, Corix will propose an appropriate method and period of recovery for the deferral account. Recovery options may include a rate rider or disposition into another deferral account for recovery.

In this Application Corix's proposals are intended to provide financial relief for customers during the COVID-19 pandemic while maintaining the financial viability of the utility. The length of the pandemic is unknown at this time. Corix will continue to monitor the situation and if issues arise, then further amendments to the tariffs may be required. Fortunately, at this time Corix, has the financial ability to support customers during the emergency period and bear the burden of the uncertain cashflow from collections. If the pandemic persists and/or Corix begins to face challenges with liquidity or access to debt markets, Corix will make an application to amend the tariffs and the LPC to reflect the financial situation faced by the utility.

Corix proposes that the BCUC review this application as expeditiously as possible. Corix continues to provide customers with safe and reliable service during these extraordinary times while observing best practice from applicable medical health officers. Corix frequently communicates with stakeholders via communication letters¹¹ and Corix's website. The approval of the requests in this Application will allow Corix the flexibility to effectively respond and provide customers support as needed.

¹¹ See Appendix II.

Appendix I

Corix's Existing Tariff Terms and Standard Fees and Charges:

Late Payment Charges

Table 1: Existing Tariff Terms and associated Standard Fees and Charges related to Late Payment Charges

UTILITY	EXISTING TARIFF TERMS	STANDARD FEES AND CHARGES
<p>Dockside Green Energy</p>	<p><u>14. Late Payment Charge And Collection Charge</u> If the amount due on any bill has not been paid in full on or before the due date shown on such bill, a further bill will be rendered to include the overdue amount plus a late payment charge as set out in the Standard Fees and Charges Schedule. Notwithstanding the due date shown, to allow time for payments made to reach the Utility and to co-ordinate the billing of late payment charges with scheduled billing cycles, the Utility may, in its discretion, waive late payment charges on payments not processed until a number of days after the due date. If the Customer's account is overdue and requires additional effort to collect, the Utility may charge the Customer a collection charge as set out in the Standard Fees and Charges Schedule.</p>	<p>Late Payment Charge: Interest on outstanding balance equal to the lesser of 1.5% per month (19.6% compounded annually) and the maximum legal interest rate allowable. Collection Charge: \$45.00</p>
<p>BMDEU (UniverCity)</p>	<p><u>14. Late Payment Charge And Collection Charge</u> If the amount due on any bill has not been paid in full on or before the due date shown on such bill, a further bill will be rendered to include the overdue amount plus a late payment charge as set out in the Standard Fees and Charges Schedule. Notwithstanding the due date shown, to allow time for payments made to reach the Utility and to co-ordinate the billing of late payment charges with scheduled billing cycles, the Utility may, in its discretion, waive late payment charges on payments not processed until a number of days after the due date. If the Customer's account is overdue and requires additional effort to collect, the Utility may charge the Customer a collection charge as set out in the Standard Fees and Charges Schedule.</p>	<p>Late Payment Charge: Interest on outstanding balance equal to the lesser of 1.5% per month (19.6% compounded annually) and the maximum legal interest rate allowable. Collection Charge: \$45.00</p>
<p>UBC NDES</p>	<p><u>14. Late Payment Charge And Collection Charge</u> If the amount due on any bill has not been paid in full on or before the due date shown on such bill, a further bill will be rendered to include the overdue amount plus a late payment charge as set out in the Standard Fees and Charges Schedule. Notwithstanding the due date shown, to allow time for payments made to reach the Utility and to co-ordinate the billing of late payment charges with scheduled billing cycles, the Utility may, in its discretion, waive late payment charges on payments not processed until a number of days after the due date. If the Customer's account is overdue and requires additional effort to collect, the Utility may charge the Customer a collection charge as set out in the Standard Fees and Charges Schedule.</p>	<p>Late Payment Charge: Interest on outstanding balance equal to the lesser of 1.5% per month (19.6% compounded annually) and the maximum legal interest rate allowable. Collection Charge: \$45.00</p>
<p>Sun Rivers Gas</p>	<p><u>19. Late Payment Charge</u> If the amount due on any bill has not been paid in full on or before the due date shown on such bill, and if the unpaid balance is \$15 or more, a further bill will be rendered to include the overdue amount plus a late payment charge as set out in the Standard Fees and Charges Schedule. Notwithstanding the due date shown, to allow time for payments made to reach Sun Rivers, and to co-ordinate the</p>	<p>Late Payment Charge: 1.5% per month (19.6% per annum) on outstanding balance</p>

Corix Application Regarding Customer Relief due to COVID-19

UTILITY	EXISTING TARIFF TERMS	STANDARD FEES AND CHARGES
	<p>billing of late payment charges with scheduled billing cycles, Sun Rivers may, in its discretion, waive late payment charges on payments not processed until a number of days after the due date.</p>	
<p>Sun Rivers Electric</p>	<p><u>18. Late Payment Charge</u> If the amount due on any bill has not been paid in full on or before the due date shown on such bill, and if the unpaid balance is \$30 or more, a further bill will be rendered to include the overdue amount plus a late payment charge as set out in the Schedule of Standard Charges. Notwithstanding the due date shown, to allow time for payments made to reach Corix, and to coordinate the billing of late payment charges with scheduled billing cycles, Corix may, in its discretion, waive late payment charges on payments not processed until a number of days after the due date.</p>	<p>Late Payment Charge: 1.5% per month (equivalent 19.6% per annum compounded monthly) calculated from the billing date.</p>
<p>Sonoma Pines Gas</p>	<p><u>19. Late Payment Charge</u> If the amount due on any bill has not been paid in full on or before the due date shown on such bill, and if the unpaid balance is \$15 or more, a further bill will be rendered to include the overdue amount plus a late payment charge as set out in the Standard Fees and Charges Schedule. Notwithstanding the due date shown, to allow time for payments made to reach TMUS - Sonoma Pines, and to coordinate the billing of late payment charges with scheduled billing cycles, TMUS - Sonoma Pines may, in its discretion, waive late payment charges on payments not processed until a number of days after the due date.</p>	<p>Late Payment Charge: 1.5% per month (19.6% per annum) on outstanding balance</p>
<p>Sonoma Pines Electric</p>	<p><u>18. Late Payment Charge</u> If the amount due on any bill has not been paid in full on or before the due date shown on such bill, and if the unpaid balance is \$30 or more, a further bill will be rendered to include the overdue amount plus a late payment charge as set out in the Schedule of Standard Charges. Notwithstanding the due date shown, to allow time for payments made to reach Corix, and to coordinate the billing of late payment charges with scheduled billing cycles, Corix may, in its discretion, waive late payment charges on payments not processed until a number of days after the due date.</p>	<p>Late Payment Charge: 1.5% per month (equivalent 19.6% per annum compounded monthly) calculated from the billing date.</p>
<p>Panorama Propane</p>	<p><u>19. Late Payment Charge</u> If the amount due on any bill has not been paid in full on or before the due date shown on such bill, and if the unpaid balance is \$15 or more, a further bill will be rendered to include the overdue amount plus a late payment charge as set out in the Administrative Charges Schedule. Notwithstanding the due date shown, to allow time for payments made to reach TCU, and to co-ordinate the billing of late payment charges with scheduled billing cycles, TCU may, in its discretion, waive late payment charges on payments not processed until a number of days after the due date.</p>	<p>Late Payment Charge: 1.5% per month (19.6% per annum) on outstanding balance</p>

Appendix II

COVID-19 Stakeholder Communication Letters

March 16, 2020

At the Corix Group of Companies, which includes Corix Utilities Inc. (the “Company”), the health and safety of our employees and customers is our first priority. This priority has guided our efforts to mitigate any potential public health or business impacts the Coronavirus (COVID-19) outbreak may cause. Over the course of the past several weeks, Corix has instituted a company-wide Incident Command Task Force that is charged with planning and executing preparedness activities focused on protecting employee and public health and ensuring we continue to provide our customers and communities with safe and reliable energy, water and wastewater services. Since the formation of the Incident Command Task Force, several steps have been taken to mitigate any disruption to our employees and customers. Below you will find a list of several actions taken by the Company:

- **Critical Inventories and Spares Planning** – Chemicals and critical spare parts inventories are being assessed and preparations made to ensure sufficient supplies are kept on-hand to maintain essential business operations and ensure safe, reliable service to our customers.
- **Workforce Planning** – Essential job functions are being identified to prepare for potential large-scale absenteeism in the workplace; a remote work pilot exercise was conducted on Friday, March 13, 2020 to test the necessary administrative and IT systems needed to support implementation of a temporary remote work policy. Remote work has been identified as core to the company’s social distancing practices as directed by the Centers for Disease Control and Prevention (“CDC”).
- **Facility Emergency Action Plans** – Company health and safety professionals are working to complete updated Emergency Action Plans for all office locations to ensure appropriate protective and disinfection actions are taken if COVID-19 infects one or more employees.
- **Suspension of Business Travel** – The Company has suspended all international and domestic business travel until further notice, with the exception of travel required for essential operational and field activities. These activities are essential for the safe and reliable provision of utility services and can be performed using recommended social distancing measures.

The Corix Group of Companies is taking all reasonable and appropriate, science-based, actions required to mitigate the impacts the COVID-19 outbreak on our employees and customers. As the situation continues to develop, we will closely monitor guidance provided by the CDC, the World Health Organization and our state and local public health agencies and make decisions accordingly.

The Corix Group of Companies takes pride in providing the communities we serve with safe and reliable energy, water and wastewater services. During this uncertain time, we are focused on serving our communities and being strong partners in the global effort to protect public health. Please do not hesitate to contact me via email at travis.kulak@corix.com or by phone at 604-786-2040 if you have any questions or concerns.

Sincerely,

Travis Hickford-Kulak
President, Energy Services Canada

March 18, 2020

RE: COVID-19 Response Update

The Corix Group of Companies, which includes Corix Utilities Inc. (the “Company”), is providing this update regarding actions taken by the Company to address the COVID-19 outbreak since our most recent correspondence to you, dated March 16, 2020. The COVID-19 situation continues to evolve rapidly; as a result, the Company is working to adapt quickly and make timely decisions that ensure the health and safety of our employees and the communities we serve. Below you will find a list of several steps taken by the Company in the last four days:

- **Remote Work and Office Closures** – Following a successful remote work “dry run” exercise on Friday, March 13th, the Company has asked all employees for whom it is possible to work away from the office to begin working remotely starting, Monday, March 16th for a period of at least two weeks. Remote work has been identified as core to the Company’s social distancing practices as directed by the Centers for Disease Control and Prevention (“CDC”). Employees who are not able to work remotely, will continue to perform their essential operational and field activities, while practicing social distancing. Because of our transition to remote work as well as recent guidance provided by the CDC concerning social distancing, all Company offices were closed to the public temporarily, effective at 5:00 pm local time on March 16th. The Company will revisit the temporary remote working plan before March 31st.
- **Contingency Plans** – Essential job functions have been identified and contingency plans have begun to be developed for both operational field staff and office staff in preparation for potential large-scale absenteeism in the workplace. Contingency plans will be in place and will be implemented as necessary to ensure we meet our commitment to provide safe and reliable energy, water and wastewater service to our customers.
- **Emergency Security Clearances for Access to Plants and Facilities** – Company leaders are currently in the process of securing the proper local emergency security clearances necessary to access utility systems in case of mandatory curfews and movement restrictions. This will ensure we are able to continue to operate our utility facilities as the situation develops.
- **Cyber Security Precautions** – Company Information Technology Services personnel have been working to ensure employees are operating in a secure manner from home WiFi networks through VPN access and written guidance to employees about cyber security protocols and measures to safeguard our systems during this temporary remote work period.

The Corix Group of Companies will continue to take all reasonable and appropriate, science-based, actions required to mitigate the impacts the COVID-19 outbreak on our employees and customers. We are committed to keeping stakeholders, customers and the communities we serve apprised of our decisions and actions. Please do not hesitate to contact me via email at travis.kulak@corix.com or by phone at 604-786-2040 if you have any questions or concerns.

Sincerely,

Travis Hickford-Kulak
President, Energy Services Canada

March 26, 2020

RE: COVID-19 Response – Update

The Corix Group of Companies, which includes Corix Utilities Inc. (the “Company”), is providing this third update regarding actions taken by the Company to address the COVID-19 outbreak since our most recent correspondence to you, dated March 18, 2020. As the COVID-19 situation continues to evolve, we continue to adapt our operations to ensure we continue to provide safe and reliable service to customers, while keeping our employees safe. Below you will find several actions the Company has taken since our last update:

- ***Social Distancing Scheduling*** – The Company has created a new scheduling policy for its operations staff in accordance with the social distancing guidance provided by the Centers for Disease Control (CDC). Social distancing schedules minimize contact between employees while operating utility facilities and systems. Social distancing schedules enable the Company to continue providing safe and reliable service to our customers, while protecting the health and safety of our employees. All Corix companies currently have implemented social distancing operating schedules.
- ***Essential Operations Continuity Plans*** – In preparation for potential large-scale absenteeism in the workplace, all Corix companies are updating their Essential Operations Continuity Plans. Essential Operations Continuity Plans include (i) securing mutual-aid arrangements, (ii) ensuring sufficient supplies and critical spare parts inventories are on hand, and (iii) identifying appropriately licensed personnel or contractors who are available to mobilize quickly to augment the Company’s workforce. All continuity plans will be updated and completed by March 30, 2020.
- ***Emergency Security Clearances for Access to Plants and Facilities*** – Since the Company’s last update, many cities, counties and states/provinces have instituted “stay-at-home” or “shelter in place” type orders. To ensure our operations personnel have access to plants and facilities in locations where movement is restricted, all operations staff will carry an Essential Personnel Letter that identifies them to local emergency management and law enforcement officials as critical infrastructure workers who provide essential life sustaining services to customers.
- ***Regular Customer Communications*** – During this time of uncertainty, we also continue to provide regular communications to our customers. A direct customer letter was sent to customers via email on March 18, 2020 and again on March 25, 2020 with updates on actions the Company has taken to ensure safe, reliable service to them. In addition to direct customer letters, we are providing real-time updates on our website (www.Corix.com) and social media. As the COVID-19 public health crisis continues to evolve, we will communicate regularly with all our customers.

We hope you find these continuing updates by the Company helpful and I invite you to email me at travis.kulak@corix.com or to call me direct at 604-786-2040 with any questions or concerns you may have.

Sincerely,

Travis Hickford-Kulak
President, Energy Services Canada

April 1, 2020

RE: COVID-19 Response – Update

The Corix Group of Companies, which includes Corix Utilities Inc. (the “Company”), is providing this fourth update regarding actions taken by the Company to address the COVID-19 outbreak since our most recent correspondence to you, dated March 26, 2020. As the COVID-19 situation continues to evolve, we continue to adapt our operations to ensure we continue to provide safe and reliable service to customers, while keeping our employees safe. Below you will find several actions the Company has taken since our last update:

- ***Customer Payment Plan Implementation and Communication*** – In preparation for the potential increase in customers carrying unpaid balances as a result of economic hardship caused by COVID-19, the Company is preparing communications to customers regarding payment plan options. The Company is monitoring recommendations and directives from regulators to ensure we are in compliance and providing the best options for our customers. The Company will use a multiple communications channel approach that includes bill inserts, customer emails, and posts on our websites and social media platforms. We will communicate this information clearly and use different channels to help ensure customers understand their options in setting up payment plans.
- ***Health and Safety Guidance Policies for Operations Staff*** – Throughout the COVID-19 public health crisis, the Company has instituted policies and modified normal operations activities to protect the health of our employees and customers while continuing to meet our commitment of providing reliable service. Several policies include:
 - o *Social Distancing Scheduling* – Our operations personnel are now operating under physical distancing schedules that limit employee contact with one another while performing plant and systems operations and maintenance tasks; our office-based personnel continue to work remotely under the Company’s Remote Work Policy.
 - o *Updated PPE Guidance* – The Company is working to ensure its staff has access to use needed PPE to limit possible transmission of COVID-19. Updated PPE guidance now includes gloves, hand sanitizer and disinfecting wipes.
 - o *Vehicle Maintenance Guidance* – New guidance has been issued to Operations personnel regarding how to handle any maintenance that needs to be done to vehicles while preventing close contact with service providers. Maintaining proper care of fleet vehicles ensures our vehicles continue to remain safe for our employees’ uses.
 - o *Multiple Employee Tasks* – The Company has developed instructions for Operations staff on how to complete routine tasks that require two employees to perform them while maintaining proper physical distancing and appropriate use of PPE.
 - o *Critical Contractor/Visitor Guidance* – The Company has communicated guidance to its critical visitors and contractors regarding expectations around physical distancing with Company employees while performing services for the Company.

- **Remote Work Policy Extension** – On March 27th, the Company extended its Remote Work Policy for employees who have been working remotely until further notice. In addition, offices will remain closed to the public until further notice. Since the Remote Work Policy was instituted, the Company has continued to operate without interruption. We will continue to evaluate the status of our Remote Work Policy as public health guidance evolves over the next month.
- **Regular Customer Communications** – Regular communication with our customers remains a key focus for the Company during this uncertain time. To this end, the Company is issuing another COVID-19 update to customers early the week of April 6, 2020. The customer letter will be posted on our website and on all social media platforms. In addition to providing periodic COVID-19 response updates, we are including regular messaging on our website and social media platforms emphasizing the need for customers to maintain proper social distance with Company Operations staff when they are performing regular tasks in the customer’s area and reminding customers not to flush disinfecting wipes to prevent issues in our sewer collection and treatment systems. We will continue to communicate with our customers regularly as circumstances continue to develop over the next several weeks.

We hope you find these continuing updates by the Company helpful and I invite you to email me at travis.kulak@corix.com or call me at 604-786-2040 with any questions or concerns you may have.

Sincerely,

Travis Hickford-Kulak
President, Energy Services Canada

April 14, 2020

RE: COVID-19 Response – Update

The Corix Group of Companies, which includes Corix Utilities Inc. (the “Company”), is providing this fifth update regarding actions taken by the Company to address the COVID-19 outbreak since our most recent correspondence to you, dated April 1, 2020. Below you will find several actions the Company has taken since our last update:

- **Essential Personal Protective Equipment** – From the beginning of the COVID-19 crisis, the Company has taken actions to ensure our operations teams have an adequate supply of essential personal protective equipment (PPE). Our operations teams are on the front line of public health during this situation, and it is critical that we provide them with the proper PPE to do their jobs effectively. The Company is currently tracking its supplies of hand sanitizer, gloves, disinfecting wipes, masks, eye protection and Tyvek suits to ensure we have a 30-day supply on hand.
- **Tabletop Exercises** – In preparation for potential mass absenteeism in local operations, the Company is performing tabletop exercises to work through theoretical planning scenarios involving widespread infection among operations teams and assessing current states of readiness. These exercises have helped the Company to understand strengths and weaknesses in its Essential Business Continuity Plans and take appropriate corrective measures. We will continue to perform these exercises to ensure we are prepared for possible operational disruptions related to COVID-19 arise.
- **Regular Customer Communications** – As a Company, we continue to prioritize frequent communication with our customers. Our third direct customer communication was sent via email on April 8, 2020 providing our customers with an update on actions taken by the Company to ensure uninterrupted delivery of safe and reliable service while protecting the health and safety of our employees. In addition to email distribution, this communication is being posted on our website. Starting April 7, 2020, we have also included a short message on customer bills reminding them of the suspension of disconnections, as well as the importance of keeping proper physical distance from our operations staff. We also continue to update our websites and social media platforms to provide regular updates to our customers.

We hope you find these continuing updates by the Company helpful and I invite you to email me at travis.kulak@corix.com or call me at 604-786-2040 with any questions or concerns you may have.

Sincerely,

Travis Hickford-Kulak
President, Energy Services Canada

April 16, 2020

RE: COVID-19 Response – Update

The Corix Group of Companies, which includes Corix Utilities Inc. (the “Company”), is providing this sixth update regarding actions taken by the Company to address the COVID-19 outbreak since our most recent correspondence to you, dated April 14, 2020. Below you will find several actions the Company has taken since our last update:

- **Next Step Planning** – As the day-to-day has become more stable with the COVID-19 crisis, we have begun to plan the necessary communications to customers, employees and other external stakeholders that will need to occur when we start the return to normal business operations. In preparation for the potential increase in customers carrying unpaid balances as a result of economic hardship caused by COVID-19, the Company is preparing communications to customers regarding payment plan options in accordance with applicable regulatory directives. The Company is also working on internal communications for our Operations staff to facilitate a smooth transition back to normal work schedules and staffing plans when Physical Distancing requirements are lifted. We will continue to provide updates as we complete our plans and begin communicating with our customers, employees and other external stakeholders.
- **Lone Worker Safety** – As you recall in our previous updates, our Operations employees have implemented Physical Distance Schedules to reduce contact among one another. As a result, most employees are working alone throughout the duration of their shifts. To ensure the safety of our lone workers, we have implemented technology that allows lone workers to set regular check-in times with their managers through an app on their I-pads to enable managers to be alerted when a worker misses a scheduled check-in during the course of their workday. This technology helps the Company protect the welfare of its Operations personnel as they work alone. Ensuring the safety of our workers is critical, as they are essential to protecting the public health of our communities during this crisis.
- **PPE Purchasing Support** – As the COVID-19 crisis progresses, proper Personal Protective Equipment (PPE) for our operations staff, including surgical-style masks and gloves, continues to be difficult to find and procure. Our procurement team has worked to diversify suppliers, including contracting with non-traditional vendors of PPE to support the safety of our workforce. The addition of these new vendors has allowed us to increase our PPE inventory. We will continue to be creative in our sourcing activities to ensure our staff has a 30-day supply of PPE on hand throughout the remainder of the COVID-19 emergency.

We hope you find these continuing updates by the Company helpful and I invite you to email me at travis.kulak@corix.com or call me at 604-786-2040 with any questions or concerns you may have.

Sincerely,

Travis Hickford-Kulak
President, Energy Services Canada