Report to Utility Committee

May 6, 2024

EPCOR WATER SERVICES

Response to July 9, 2021 Utility Committee Motions

Review of PBR Performance Measures

Table of Contents

1.0 Introduction

1. The following motion was issued at the July 9, 2021 Utility Committee meeting where the Performance Based Regulation (PBR) Applications submitted by EPCOR Water Services Inc. (EWS) were reviewed.

That Administration work with EPCOR to bring forward reports prior to the next Performance Based Rates term for Drainage Services and Wastewater Treatment effective April 1, 2025, providing further background and the appropriate regulatory treatment for the following items:

1. *Improved disclosure of changes in accounting and capitalization policies and treatment;*
2. *Reporting the size of the workforce including actual and forecast full-time equivalents;*
3. *A review of how long-term debt interest rates are set for EPCOR Water Services Inc.;*
4. *A review of the performance measures to ensure they are increasingly stringent and challenging over time; and*
5. *A review of the deferral account and other adjustment mechanisms to deal with variations in usage.*

2. EWS addressed items 1, 2 and 3 from the above motion in its report to Utility Committee on November 4, 2022. This report provides EWS' response to item 4. In this report, EWS provides a review of the approach for setting operational performance standards under the PBR framework. This report also demonstrates that the principles adopted for EWS' performance frameworks are consistent with the PBR frameworks established by other regulators to ensure that service quality is maintained.

3. The PBR framework encourages utilities to find opportunities to improve efficiency and reduce costs while meeting set performance standards. This promotes more efficient practices that benefit all stakeholders. However, careful attention is necessary while designing a PBR framework to ensure that the utility's performance standards align with the goal of preserving public interest while avoiding unintended consequences such as cutting costs at the expense of service quality or introducing unnecessarily stringent standards that lead to unnecessary costs. Performance standards and penalties are crucial to prevent a decline in service quality due to the presence of cost-saving incentives within the PBR framework.

2.0 Background

4. Operational performance measures are established as part of the PBR for each of the three utilities managed by the EPCOR Water Services business unit - Water (encompassing water treatment, distribution and transmission), Wastewater Treatment (together formerly Water Canada) and Wastewater Collection (formerly Drainage Services) - are established as part of the PBR application process. As currently conceived under the PBR framework, the performance measures are established to ensure that a "standard" or optimal level of performance is maintained and if service levels deteriorate below the established standards, financial penalties are imposed on the utility. In other words, the standards ensure that the level of service provided to customers does not degrade over the PBR period.

5. During each PBR renewal, EWS conducts a thorough review of its performance standards to ensure that the proposed performance standards are set appropriately to meet the expectations of its customers and regulator while balancing the need to maintain reasonable rates. Many of EWS' performance standards are established based on a rolling average of historical performance levels. For these measures, as performance improves over time, EWS' standards become increasingly stringent without imposing unreasonable costs onto ratepayers. However, it is important to note that it is also wholly appropriate to set standards to maintain current service levels as increasingly stringent performance standards may not be warranted from a customer service or cost/benefit perspective.

6. Within the current PBR framework, EWS is financially incented to find efficiencies and reduce costs while maintaining service levels. EWS is committed to providing safe and reliable utility services while ensuring that the associated costs remain reasonable. It is important to note that the PBR framework does not provide any financial incentive or reward for EWS to exceed performance standards. The inclusion of a financial reward mechanism to improve performance beyond the standard or an optimal level of service may lead to unnecessary increases in spending on systems and processes to achieve this performance.

7. To establish overall performance that meets the expectations of EWS' customers and regulator, performance is determined (and later assessed) for each utility through a set of performance measures. Where possible, such as in the areas of health and safety, common measures are established across the three utilities to facilitate comparability. While the individual standards are generally unique for each utility, they are managed within a common framework and assessment approach, as outlined in section 2.1.

2.1 Framework for Performance Standards

8. As part of establishing EWS' initial Water PBR application in 2002, a comprehensive framework was established to define the critical areas of operational performance that EWS must meet to deliver safe and reliable utility services. This framework has been adopted by both Wastewater Treatment and Wastewater Collection. For each utility, operational performance is assessed under five broad categories. Each of these categories are defined as an index which represents the aggregate performance of multiple performance measures within that category. The indices and weightings applicable to each index for the current 2022-2024/2026 PBR term are detailed in Table 2.1-1. The weightings are different between Water, Wastewater Treatment and Wastewater Collection Services in order to reflect the different nature of the operations and stakeholder expectations.

Table 2.1-1
EWS Performance Measure Categories and Weightings
(2022-2024 and 2022-2026 PBR Terms)

Performance Category	Water 2022-2026	Wastewater Treatment 2022-2024	Wastewater Collection 2022-2024
1 Water Quality Index*	30%	-	-
2 Customer Service Index	15%	15%	20%
3 System Reliability & Optimization Index	25%	25%	30%
4 Environmental Index	15%	45%	35%
5 Safety Index	15%	15%	15%
6 TOTAL	**100%**	**100%**	**100%**

* Quality index for Wastewater Treatment is included in the environmental index category.

9. On an annual basis, actual performance is assessed against the established standard for each performance measure. If EWS does not meet the established performance standards, financial penalties are applied to a maximum of $2.4 million per year ($1.0 million for Water, $0.4 million for Wastewater Treatment and $1.0 million for Wastewater Collection). If a penalty is assessed, it is returned to ratepayers in the form of a rate reduction.

10. During each PBR application, EWS may propose revised weightings, updated standards, and/or new performance measures for City Council review and approval. The updates reflect changes that EWS considers are most appropriate for measuring EWS' performance against the expectations of its customers and regulator. In advance of the PBR submission, EWS also seeks

stakeholder feedback on their priority of the various performance categories. This feedback helps to ensure that the weightings for each index are aligned with stakeholder expectations. For the 2025-2027 Wastewater Treatment and Collection PBR, EWS will be proposing to replace some performance measures with new measures and will also propose updates to the standards for regulatory review and approval by City Council.

11. The performance measures for the current 2022-2024 and 2022-2026 PBR terms for Water, Wastewater Treatment and Wastewater Collection are detailed in Appendices A, B and C, respectively.

2.2 Performance Standards

12. EWS investigated the performance measures used by other utilities as well as by the leading water and wastewater associations. These include the American Water Works Association (AWWA), the leading North American drinking water industry association, the Water Environment Federation, the leading wastewater industry association and the Office of Water Services (OFWAT), the financial water and wastewater regulator in the United Kingdom. EWS also reviewed the National Water & Wastewater Benchmarking Initiative.

13. Despite these efforts, it has proven challenging to find broad based industry benchmarks for the majority of the individual performance measures. While some utilities tend to use some of the individual measures similar to EWS, these measures are not directly comparable to EWS measures due to differences in many factors such as treatment plant and distribution system configuration, operating conditions, regulatory requirements, environmental factors, raw water quality, wastewater conditions and weather.

14. For these reasons, EWS' performance standards are generally established by evaluating its own performance trends over a period of time, typically a 10-year historical rolling average if available, or another reasonable basis as applicable. As EWS' performance on most measures have improved over time, this historical rolling average approach generally leads to standards that become increasingly difficult to achieve over time without imposing unreasonable costs onto ratepayers. Other standards may be set to maintain current service levels because increasingly stringent performance standards may not be warranted from a customer service or cost/benefit perspective. Where possible standards may also be set to align with industry benchmarks or to EPCOR corporate standards such as health and safety.

2.3 Assessment of Performance

15. In accordance with provisions under the Water Services Bylaw and the Drainage and Wastewater Treatment Services Bylaw, audits are conducted annually to provide assurance that all measurement and reporting of the performance measurement results have been independently verified. Following the completion of this audit, EWS submits the audited performance results to the City Manager for review and approval as part of the Annual Rate Filing process. EWS also reports the actual performance of its performance measures to Utility Committee through the annual PBR Progress Reports.

16. Each utility's performance is evaluated using a point-based assessment of the five performance indices shown in section 2.1, with 100 base points available. Total points achieved are calculated by aggregating the points achieved for each performance standard. Bonus points are also awarded by index when actual performance exceeds the standards, with a maximum of 10 bonus points available across all five indices.

17. Historically, EWS has exceeded the 100 point standard in all but one of the past 20 years for the Water utility (treatment and distribution). Wastewater treatment has exceeded the 100 point standard in each of the past 10 years since the Gold Bar Wastewater Treatment Plant was transferred to EPCOR in 2009. Wastewater Collection (Drainage) introduced a PBR style performance measures program through a Bylaw Amendment beginning in 2020 and exceeded the 100 point standard for 2020-2023. EWS' ability to consistently achieve the performance standards reflects its strong commitment to maintaining service quality during each PBR term. Individual annual results are detailed in Tables 2.3-1 through 2.3-3 below.

Table 2.3-1
Water Services - Actual Total Performance by PBR Term

	2002-2006 PBR		2007-2011 PBR		2012-2016 PBR		2017-2021 PBR		2022-2026 PBR	
Row	Year	Points	Year	Points	Year	Points	Year	Points	Year	Points
1	2002 *	99.4	2007	102.6	2012	106.4	2017	107.6	2022	110.0
2	2003	100.1	2008	103.3	2013	106.8	2018	107.1	2023	109.8
3	2004	102.4	2009	100.3	2014	107.2	2019	107.5	2024	n/a
4	2005	101.6	2010	102.8	2015	106.0	2020	108.0	2025	
5	2006	102.1	2011	104.9	2016	108.4	2021	107.6	2026	
6	**Average**	**101.1**	**Average**	**102.8**	**Average**	**107.0**	**Average**	**107.6**	**Average**	**109.9**

* no financial penalty was assessed as points earned were less than one full point below 100

Table 2.3-2
Wastewater Treatment – Actual Total Performance by PBR Term

	2012-2016 PBR		2017-2021 PBR		2022-2024 PBR	
Row	Year	Points	Year	Points	Year	Points
1	2012	109.3	2017	110.0	2022	105.9
2	2013	107.3	2018	110.0	2023	107.4
3	2014	110.0	2019	110.0	2024	n/a
4	2015	110.0	2020	110.0		
5	2016	110.0	2021	110.0		
6	**Average**	**109.3**	**Average**	**110.0**	**Average**	**106.7**

Table 2.3-3
Wastewater Collection – Actual Total Performance by PBR Term

	2017-2021 PBR		2022-2024 PBR	
Row	Year	Points	Year	Points
1	2017		2022	108.6
2	2018		2023	108.8
3	2019		2024	n/a
4	2020	104.4		
5	2021	101.9		
6	**Average**	**103.2**	**Average**	**108.7**

3.0 Rationale for Maintaining the PBR Performance Measure Approach

18. EWS recommends continuing with the existing framework that has been established for PBR performance measures. The existing framework ensures that appropriate incentives and mechanisms are in place to ensure EWS continues to provide safe, reliable utility services in a cost effective manner. The current performance measure framework and approach were established to maintain a "standard" level of performance that reasonably reflects the expectations of customers and the regulator. The existing framework also provides sufficient flexibility to adjust the performance measures and/or standards at the beginning of each PBR term and an appropriate level of transparency on how EWS is performing relative to the approved standards.

19. Other PBR structures use standards of performance to maintain a certain level of performance in the same manner as EWS. For example, the Alberta Utilities Commission (AUC) relies on service performance measures and penalties to ensure minimum levels of

performance are met under its PBR regulatory framework for regulating Alberta electric and gas utilities. The AUC explains the need for these performance measures and penalties in Decision 2012-237 (AUC's original decision establishing the Distribution Performance-Based Regulation) and in Decision 26346-D0-2021 (Evaluation of PBR in Alberta) as referenced below:

> **AUC Decision 2012-237**
> *The Commission has recognized from the outset of its rate regulation initiative that the creation of greater efficiency incentives through adoption of a PBR plan also creates concerns that the resulting cost cutting might lead to reductions in quality of service. It is for this reason that the adoption of PBR typically coincides with the development and adoption by regulators of stronger quality of service regulatory measures when needed.* [paragraph 23]
> …
> *Principle 1. A PBR plan should, to the greatest extent possible, create the same efficiency incentives as those experienced in a competitive market while maintaining service quality.* [paragraph 28]
>
> **AUC Decision 26356-D001-2021**
> *In Decision 2012-237 that initiated the first PBR term, the Commission recognized that while PBR "creates efficiency incentives similar to those in competitive markets, it does not create incentives to maintain quality of service." Accordingly, the Commission required the utilities to maintain their service quality throughout the PBR terms. The Commission monitors service quality performance through Rule 002, which sets the minimum service quality standards and reporting requirements for the utilities.* [paragraphs 37 and 38]

20. As noted in the references above, service quality measures are necessary to ensure service levels are maintained. These standards are not intended to reflect aspirational targets for service quality for the following reasons:

- Setting aspirational may not be always be warranted from a customer service or cost/benefit perspective. As an example, EWS' potable water quality far exceeds all public health guidelines and EWS' more stringent internal guidelines. While the water quality measure is likely the most important of all performance measures tracked, increasing performance levels beyond the current standard (i.e. 99.7% of total water quality tests taken do not yield suspect results) would be extremely

costly and provide no material benefits to consumers. If an expectation was established that increasing levels of performance were required, in the case of water quality, it would be both unattainable and unrealistic. In cases like this, EWS will propose to maintain the current standards of performance in its PBR.

- There are also instances where underlying determinants of the current measures, such as with response time measures, make achieving the current standard more difficult over time without adjusting the actual standard. In the case of response times, they are increasingly challenging due to growth in the city and increased traffic congestion. If the expectation was established that progressively faster response times were required, EWS would have to increase both the number of crews and equipment in order to achieve the improvement. This would likely prove to be costly and the costs would ultimately be reflected in higher customer rates which may not be warranted based on customer expectations of service quality.
- At a certain point, achieving increasing levels of operational performance would necessitate a material increase in costs for additional resources or equipment. Under the PBR structure, EWS is subject to a productivity/efficiency factor that is applied to rates irrespective of whether or not efficiencies are achieved. EWS is also subject to annual financial penalties if the established standards are not met. It would therefore be incongruent to establish continually higher levels of operational performance with associated financial penalties, while at the same time, impose financial incentives to increase efficiency, which acts as an imposed cost reduction.

21. EWS' standards of performance do generally reflect increasing levels of performance from one PBR term to another as they are typically based on the prior 10 year average of actual performance or some other historical level of performance. This approach ensures that the standards reflect on-going operational improvements which are achieved as performance improves but without extraordinary increases in costs to ratepayers. The increasing performance standards across time for EWS' Water and Wastewater Treatment performance measures are reflected in Appendix D and E. As noted above, there are other performance measures where the standards are maintained because they have reached a point where any further increases would not be warranted from a cost of service or customer perspective.

22. The performance measures for Wastewater Collection (Appendix F), have generally been maintained for the second PBR term due to the limited performance history available to determine the appropriate standard. Only the 2020 and part of the 2021 performance measure

results were known at the time of setting the standards for Wastewater Collection for the 2022-2024 PBR term.

Appendix A
Water Service Quality Measures

		A	B	C	D	E
	Index Measures	**Measure**	**2022-26 Standard**	**Points**		
				Avail.	**Bonus**	**Total**
1	**Water Quality Index**	% target achieved	99.7%	30.00	0	30.00
2	**Customer Service Index**			15.00	2.25	17.25
3	Post Service Audit Factor	% satisfied	75.0%	3.75		
4	Home Sniffing Factor	% satisfaction	94.4%	3.75		
5	Response Time Factor	Minutes to confirm	25	3.75		
6	Planned Construction Impact Factor	% compliance	95.8%	3.75		
7	**Reliability & Optimization Index**			25.00	3.25	28.25
8	Main Break Factor	# of breaks	365	6.25		
9	Water Main Repair Duration Factor	% fixed in 24 hrs.	95.4%	6.25		
10	Water Loss Factor	ILI Index	1.23	6.25		
11	System Energy Efficiency Factor	Energy/ML/Account	281	6.25		
12	**Environmental Index**			15.00	2.25	17.25
13	Water Conservation Factor	m^3 month/household	16.8	5.00		
14	Environment Incident Factor	# of incidents	5	5.00		
15	Solids Residual Mgt. Factor	Days in DF mode	120	5.00		
16	**Safety Index**			15.00	2.25	17.25
17	Near Miss Reporting Factor	# of Reports	550	3.75		
18	Worksite Inspections/ Observations	# completed	1,032	3.75		
19	Lost Time Frequency Factor	Freq./Exposure	0.40	3.75		
20	All Injury Frequency Factor	Freq./Exposure	1.00	3.75		
21	**Total Point To Be Earned**			100.00	10.00	110.00

Appendix B
Wastewater Treatment Service Quality Measures

		A	B	C	D	E
	Index Measures	**Measure**	**2022-24 Standard**	**Points**		
				Avail.	**Bonus**	**Total**
1	**Water Quality/Environmental Index**			45.00	4.50	49.50
2	WELPI Factor	% below limits	26.0%	22.5		
3	Environmental Incident Factor	# of Incidents	5	22.5		
4	**Customer Service Index**			15.00	1.50	16.50
5	H_2S – 1 Hour Exceedances Factor	# of exceedances	4	5.00		
6	H_2S – 24 Hour Exceedances Factor	# of exceedances	1	5.00		
7	Scrubber Uptime % Factor	% uptime	96%	5.00		
8	**Reliability & Optimization Index**			25.00	2.50	27.50
9	Enhanced Primary Treatment Factor	% in use	94%	8.33		
10	Bio-solids Inventory Reduction	Relative Reduction	1.05	8.33		
11	Energy Efficiency Factor	kWh/ML of effluent	508	8.33		
12	**Safety Index**			15.00	1.50	16.50
13	Near Miss Reporting Factor	# of Reports	220	3.75		
14	Worksite Inspections/Observations	# completed	919	3.75		
15	Lost Time Frequency Factor	Freq./exposure	0.75	3.75		
16	All Injury Frequency Factor	Freq./exposure	1.00	3.75		
17	**Total Points to Be Earned**			100.00	10.00	110.00

Appendix C
Wastewater Collection Services Quality Measures

	A	B	C	D	E	F
	Index Measure	**Measure**	**2022-24 Standard**	**Points**		
				Avail.	**Bonus**	**Total**
1	**Environmental Index**			35	3.5	38.5
2	Stormwater Flow Monitoring	% of area (hectares) monitored	63%	11.67		
3	Environmental Incidents	# of incidents	50	11.67		
4	Green Hectares	Area managed by green infrastructure	2022-45 2023-90 2024-180	11.67		
5	**Customer Service Index**			20	2.0	22.0
6	Service Maintenance Calls	% resolved within 24 hours	80%	5		
7	Emergency Dig Ups - Service Restored	% restored within 48 hours once deemed an emergency dig up	98%	5		
8	Service Connections	% meeting 6 week target	85%	5		
9	Sewer Odour Hotspots	% coverage area of sewer odour hotspots	2022-15.0% 2023-14.5% 2024-14.0%	5		
10	**Reliability and Optimization Index**			30	3.0	33.0
11	Blocked Sewers	# blocked mainline sewers per 100 km	2.1	7.5		
12	Sewer Renewal	# kms of sewers renewed	60	7.5		
13	Infrastructure Condition Rating - Minimum Level	% of infrastructure at or above minimum level of condition rating	90	7.5		
14	Full Property Flood Inspections	# Completed	750	7.5		
15	**Safety Index**			15	1.5	16.5
16	Near Miss Reporting	# completed	750	3.75		
17	Worksite Inspections / Observations	# completed	1,300	3.75		
18	Lost Time Frequency Rate	Frequency Rate	0.75	3.75		
19	All injury Frequency Rate	Frequency Rate	4	3.75		
20	**Total Point to be Earned**			100	10	110

Appendix D
Water Services – PBR Performance Standards History

		A	B	C	D	E
	Index / Measure	**2002-2006 PBR**	**2007-2011 PBR**	**2012-2016 PBR**	**2017-2021 PBR**	**2022-2026 PBR**
1	**1.0 Water Quality Index (minimum)**	99.6	99.6	99.6	99.7	99.7
2	**2.0 Customer Service Index**					
3	2.1 Post Service Audit Factor (minimum)	71.6	72.6	74	74.9	75
4	2.2 Home Sniffing Factor (minimum)	92.5	93.4	93.8	94.4	94.4
5	2.3 Response Time Factor (maximum)	22	22	25	25	25
6	2.4 Planned Construction Impact Factor (minimum)	95	95	95	95.8	95.8
7	**3.0 Reliability & Optimization Index**					
8	3.1 Main Break Factor (maximum)	640	630	574	419	365
9	3.2 Water Main Repair Duration Factor (minimum)	92.8	93.6	93.7	93.7	95.4
10	3.3 Water Loss Factor (maximum)	4.9	4.9	3	2	1.23
11	3.4 System Energy Efficiency Factor (maximum)				309	281
12	3.5 Water Pressure (maximum)	5	5			
13	**4.0 Environmental Index**					
14	4.1 Water Conservation Factor (maximum)	20	20	19	17.2	16.8
15	4.2 Environment Incident Factor (maximum)	0	0	7	6	5
16	4.3 Solids Residual Mgt. Factor (minimum)				120	120
17	4.4 Completeness and Timeliness of Reporting (minimum)	95	90	100		
18	4.5 Emergency Response Training (minimum)	3	3			
19	4.6 Timeliness of Reporting (minimum)	100	100			
20	4.7 Vehicle Fuel Efficiency (minimum)	29.75	29.75			
21	4.8 Watershed Program Activity (minimum)			5		
22	**5.0 Safety Index**					
23	5.1 Near Miss Reporting Factor (minimum)				550	550
24	5.2 Worksite Inspections/ Observations (minimum)		800	800	1032	1032
25	5.3 Lost Time Frequency Factor (maximum)		0.59	0.59	0.57	0.4
26	5.4 All Injury Frequency Factor (maximum)		2.4	2.4	1.54	1
27	5.5 First Aid Training (minimum)	33	33	33		
28	5.6 Formal Safe Work Plans (minimum)	3486	3486	3100		
29	5.7 Injury Severity Rate (maximum)	8.92	8.92			
30	5.7 Injury Severity Rate(maximum)			8.92		
31	5.8 Safety Meetings (minimum)	40	40	36		

Appendix E

Wastewater Treatment - PBR Performance Standards History

		A	B	C
	Index / Measure	**2012-2016 PBR**	**2017-2021 PBR**	**2022-2024 PBR**
1	**1.0 Water Quality & Environmental Index**			
2	1.1 WELPI Factor (maximum)	46	28	26
3	1.2 Environmental Incident Factor (maximum)	18	10	5
4	1.3 Completeness and Timeliness of Reporting (minimum)	100		
5	**2.0 Customer Service Index**			
6	2.1 H2S – 1 Hour Exceedances Factor (maximum)		6	4
7	2.2 H2S – 24 Hour Exceedances Factor (maximum)		2	1
8	2.3 Scrubber Uptime % Factor (minimum)		90	96
9	**3.0 System Reliability & Optimization Index**			
10	3.1 Enhanced Primary Treatment Factor (minimum)	75	80	94
11	3.2 Bio-solids Inventory Reduction (minimum)			1.05
12	3.3 Energy Efficiency Factor (maximum)		514	508
13	3.4 Biogas Utilization Factor (minimum)		60	
14	**4.0 Safety Index**			
15	4.1 Near Miss Reporting Factor (minimum)		220	220
16	4.2 Worksite Inspections/Observations (minimum)	270	919	919
17	4.3 Lost Time Frequency Factor maximum)	0.81	0.75	0.75
18	4.4 All Injury Frequency Factor (maximum)	2.42	1.5	1
19	4.5 First Aid Training (minimum)	33		
20	4.6 Formal Safe Work Plans (minimum)	1100		
21	4.7 Injury Severity Rate(maximum)	8.88		
22	4.8 Safety Meetings (minimum)	12		

Appendix F

Wastewater Collection Services - PBR Performance Standards History

		A	B
	Index / Measure	**2017-2021 PBR**	**2022-2024 PBR**
1	**1.0 Environmental Index**		
2	1.1 Stormwater Flow Monitoring (minimum)	63	63
3	1.2 Environmental Incidents (maximum)	50	50
4	1.3 Green Hectares (minimum)	22	45 / 90 / 180
5	**2.0 Customer Service Index**		
6	2.1 Service Maintenance Calls (minimum)	80	80
7	2.2 Emergency Dig Ups - Service Restored (minimum)	98	98
8	2.3 Service Connections (minimum)	85	85
9	2.4 Sewer Odour Hotspots (maximum)	16.7	15.0/14.5/14.0
10	**3.0 Reliability & Optimization Index**		
11	3.1 Blocked Sewers (maximum)	2.1	2.1
12	3.2 Sewer Renewal (minimum)	60	60
13	3.3 Infrastructure Condition Rating (minimum)	90	90
14	3.4 Full Property Flood Inspections (minimum)	750	750
15	**4.0 Safety Index**		
16	4.1 Near Miss Reporting (minimum)	750	750
17	4.2 Worksite Inspections / Observations (minimum)	1300	1300
18	4.3 Lost Time Frequency Rate (maximum)	0.75	0.75
19	4.4 All injury Frequency Rate (maximum)	4	4