

City of Newport, Department of Utilities

Water Division

- Before 1876 Newport's Water Supply Spring and Touro Street Spring or Wells
- 1876 George H. Norman starts construction at Easton Pond
- 1881 Newport Water Works Company
- 1882 2nd Water System in USA to have Mechanical Filters
- 1910 Newport First in New England to Practice Chlorination
- 1929 Newport Water Corporation
- 1936 City of Newport took over system through eminent domain
- 1948 Acquired Nonquit Pond
- 1967 Acquired Watson Pond
- 1991 Updated Station 1 Treatment Plant Built



1910 Newport RI Water Treatment Plant



City of Newport, Department of Utilities

Water Pollution Control Division

Late 1800s and early 1900s - Start of the Modern Combined Wastewater Collection System

1955 - Wastewater Treatment Plant "Imhoff Cone" Technology Provided Primary Treatment

1970s - Sewer Separation Program to reduce CSOs discharging to Newport Harbor

1978 - Wellington Avenue CSO Treatment Facility Constructed

1991 - Upgraded Plant to Secondary Treatment & Washington Street CSO Treatment Facility Constructed

1999 - RIDEM Consent Agreement (RIA-292) CSO Control Program

2002 - Water Quality TRC limit 0.590 mg

2008 – EPA Intervention (Superseded Ongoing RIDEM Consent Agreement Negotiations)

2012 - City Submitted the System-wide Master Plan

2018 - Substantial plant upgrade including the conversion to ultra-violet disinfection





SOME OF THE RULES AND REGULATIONS

APPLICABLE TO THE CITY OF NEWPORT, DEPARTMENT OF UTILITIES

USEPA

- SAFE DRINKING WATER ACT (SDWA)
- CLEAN WATER ACT

RHODE ISLAND DEPARTMENT OF HEALTH (RIDOH)

- PUBLIC DRINKING WATER (216-RICR-50-05-1)
- DRINKING WATER STATE REVOLVING FUND (216-RICR-50-05-6)
- CERTIFICATION OF PUBLIC DRINKING WATER SUPPLY TREATMENT AND PUBLIC WATER SUPPLY TRANSMISSION AND DISTRIBUTION OPERATORS (216-RICR-50-05-5)
- CLEAN WATER INFRASTRUCTURE PLANS (216-RICR-50-05-7)
- LEAD POISONING PREVENTION (216-RICR-50-15-3)

PUBLIC UTILITIES COMMISSION AND DIVISION OF PUBLIC UTILITIES AND CARRIERS RHODE ISLAND

COMMISSION

- TITLE 810 PUBLIC UTILITIES COMMISSION
- FILING OF ANNUAL REPORTS BY WATER CARRIERS (810-RICR-00-00-4)
- ADDITIONAL REQUIREMENTS FOR FILINGS OF GENERAL RATE SCHEDULE CHANGES

DIVISION

- TITLE 815 DIVISION OF PUBLIC UTILITIES AND CARRIERS
- Rules of Practice and Procedure (815-RICR-00-00-1)
- STANDARDS FOR WATER UTILITIES (815-RICR-40-00-01)
- Rules and Regulations Governing the Termination of Residential Electric, Gas and Water Utility Service

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT (RIDEM)

- WATER QUALITY REGULATIONS (250-RICR-150-05-1)
- Rules and Regulations for Dam Safety (250-RICR-130-05-1)
- RULES AND REGULATIONS PERTAINING TO PESTICIDES AND THE RIPDES PESTICIDE GENERAL PERMIT
- REGULATIONS FOR THE RHODE ISLAND POLLUTANT DISCHARGE ELIMINATION SYSTEM (250-RICR-150-10-1)
- RHODE ISLAND PRETREATMENT REGULATIONS (250-RICR-150-10-2)
- Rules and Regulations for Sewage Sludge Management (250-RICR-150-10-3)
- Rules and Regulations for the Operation and Maintenance of Wastewater Treatment Facilities (250-RICR-150-10-4)
- Rules and Regulations for Wastewater Treatment Facility Operators (250-RICR-150-10-5)
- Rules and Regulations Governing the Administration and Enforcement of the Freshwater Wetlands Act (250-RICR-150-5-3)
- GENERAL PERMIT STORM WATER DISCHARGE FROM SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS REGULATED SMALL MS4s

RHODE ISLAND GENERAL LAWS

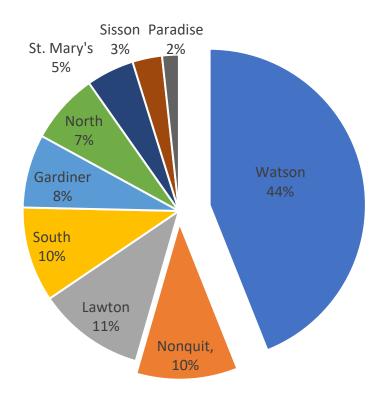
• DAM EMERGENCY ACTION PLANS SECTION 46-19-9

COASTAL RESOURCES MANAGEMENT COUNCIL (CRMC)

- RED BOOK (650-RICR-20-00-1)
- Rules and Regulations Governing the Protection and Management of Freshwater Wetlands in the Vicinity of the Coast: 650-RICR-20-00-9
- AQUIDNECK ISLAND SPECIAL AREA MANAGEMENT PLAN COASTAL DEVELOPMENT REGULATIONS: 650-RICR-20-00-7

WATER DIVISION (NWD)

Nine Surface Water NWD Reservoirs 3.8 Billion Gallons



WTP: Lawton Valley (7 MGD) & Station No. 1 (9 MGD)

Five Water Storage Facilities

Nine Pump Stations – Five Raw Water & Four Finished Water

200 Miles of Distribution Piping

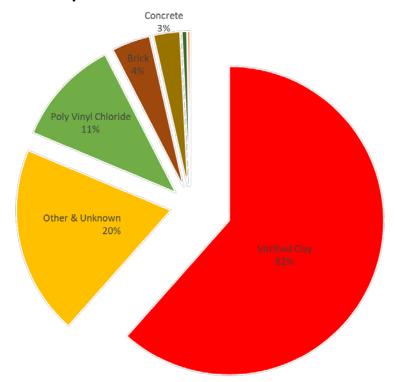


WATER POLLUTION CONTROL DIVISION (WPC)

Sanitary Sewer

- Newport Water Pollution Control Facility (i.e. Wastewater Treatment Plant)
- Washington Street CSO Treatment Facility
- Wellington Avenue CSO Treatment Facility
- 16 Sewage Pump Stations
- 97 miles Sanitary Sewer Mains Sizes Range From 4-inches to 84-inches
- Over 1,800 Sanitary Sewer Manholes

Gravity Sewer Material & Condition





WATER POLLUTION CONTROL DIVISION (WPC)

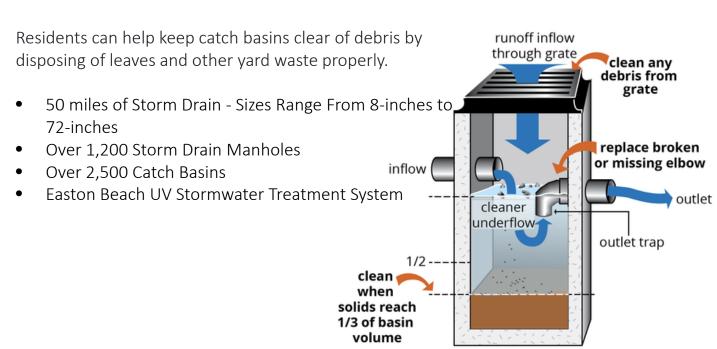
Storm Drainage

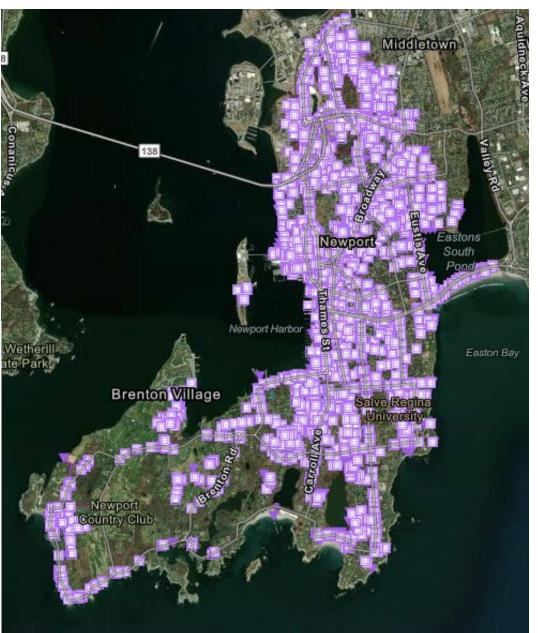
- 50 miles of Storm Drain Sizes Range From 8-inches to 72-inches
- Over 1,200 Storm Drain Manholes
- Over 2,500 Catch Basins
- Easton Beach UV Stormwater Treatment System

Catch Basin Cleaning

City of Newport

- Inspects every catch basin annually
- Cleaned as Needed





Business Model

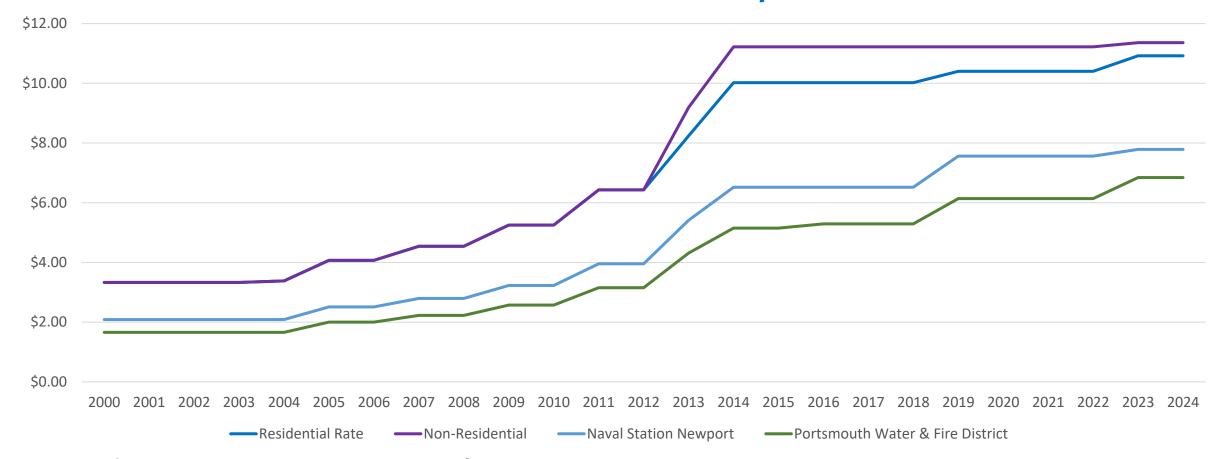
Water Pollution Control

- Enterprise Fund
 - Operates as a "non-profit" for the benefit of Newport's citizens and businesses
 - Receives NO financial support from General Fund
 - \$400,000 Payment for City Provided Services
 - \$350,000 Payment to Water Fund for Water
- Revenues
 - \$12,500,000 Sewer Use Charge
 - \$2,150,000 CSO Fixed Fee
 - \$1,700,000 Sewage Treatment Town of Middletown
 - \$1,450,000 Sewage Treatment United States Navy
 - \$617,000 Water Utility "Residuals" Sewage Treatment
 - \$200,000 Parking Fund Stormwater Fee
 - \$50,000 Maritime Fund Stormwater Fee

Drinking Water

- Enterprise Fund
 - Regional Utility Operates as a "non-profit" for the benefit of **ALL** Customers (Newport, Middletown and Portsmouth)
 - Receives NO financial support from General Fund
 - \$661,699 Payment for City Provided Services
 - \$617,000 Payment to Water Pollution Control Fund "Residuals" Sewage Treatment
- Revenues
 - \$11,870,000 Metered Water Sales
 - \$10.91 per thousand gallons Residential
 - \$11.36 per thousand gallons Non-Residential
 - \$4,050,304 Wholesale Water Sales
 - \$7.7876 per thousand gallons Wholesale Metered Sales United States Navy
 - \$6.8419 per thousand gallons Wholesale Metered Sales Portsmouth Water & Fire District
 - \$1,956,816 Miscellaneous Fees, Charges and Penalties
 - \$1,300,083 Public Fire Protection
 - \$1,202.76 Annually per Hydrant
 - \$580,972 Private Fire Protection
 - \$1,202.76 Annually per

Water Rate History



Proposed Rates FY 2024 – True Cost of Service Rates

- Residential Rate: \$10.91 Per 1,000 gallons
- Non- Residential Rate: \$11.36 Per 1,000 gallons
- Portsmouth Water & Fire District Rate: \$6.8419 Per 1,000 gallons
- Naval Station Newport Rate: \$7.7866 Per 1,000 gallons

Drinking Water Fund - Where The Money Comes From



Residential 41.3%

Naval Station Newport

7.5%

Meter Base Charge

4.6% Other (Rental Income, Reimbursements, Etc.)

3.3% Fire Protection - Private

2.1% Transfers From Restricted Accounts

Drinking Water Fund - Where The Money Goes



35.4% Debt Service

11.1% CIP Project 12.1%

6.2% Transmission & Distribution

5.1% Chemicals

4.5% Customer Servi 4.0% urce of Supply (Reservoirs)

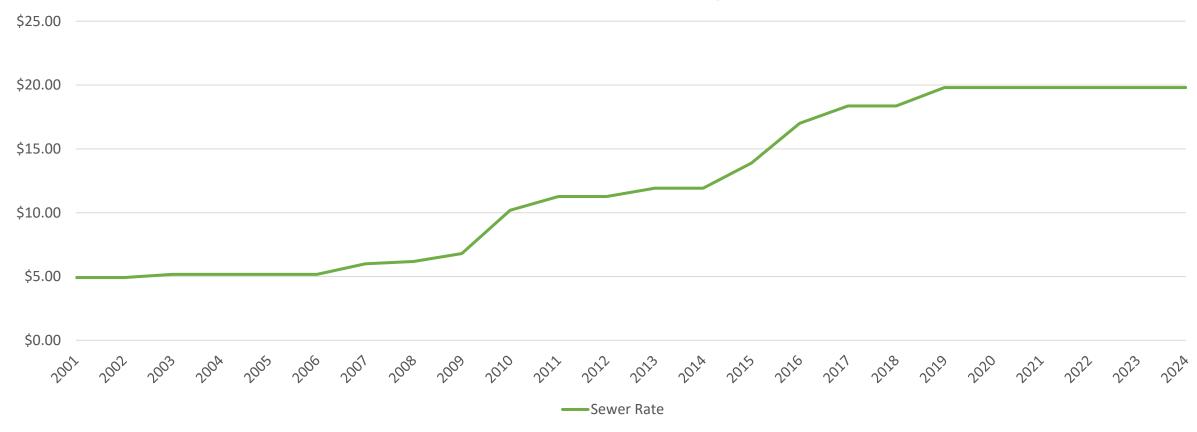
Electricity 3.6% Administration

3.6%

3.3% Insurance
City Services 2.8% Sewer Service Charges

2.6% Property Taxes
1.8% Water Laboratory

Sewer Rate History



Sewer Rates

- No Increase Sewer Use Charge
 - \$19.80 per 1000 gallons
 - No Change Since FY 2019
- CSO Fixed Fee No Increase
- IPP Fees No Increase

Stormwater & CSO

- Sewer Rates Fund Stormwater Management
- Sewer Rates Fund Combine Sewer Overflow Management & Projects

Assumptions

- Projected Sewer Use 600,000,000 gallons
- Middletown: New Flow Proportional Contract

Water Pollution Control Fund - Where The Money Comes From



57.5%

Sewer Use Charge

CSO Fixed Fee

town sewage Use F

7.0%

4.1% Middletown WPCP Debt Sha

1.6% Middletown LWFM Debt Share

0.9% Parking Fund Stormwater Fee

0.8% Disposal Permits

0.6% Pretreatment Fees

0.2% Maritime Fund Stormwater Fee

0.1% Miscellaneous

Water Pollution Control Fund - Where The Money Goes



Contract Operations

Debt Service

CIP Projects

4.5%

2.2% Liability Insurance

Affordability of Water Stormwater and Wastewater Services

RI Infrastructure Bank Affordability Criteria

- Affordability Index = Median Household Income x Employment Rate x Population Ratio
 - Newport's Affordability Index 96% Tier 3
 - 0% Anticipated Principal Forgiveness
 - Funding Possible Only if No Projects Remain in Tier 1 and Tier 2

EPA's Financial Capability Assessment (FCA) Guidance

- Average water and sewer bills as a percentage of median household income (%MHI) with a combined value less than 4.0 or 4.5 designated as "affordable."
- Often erroneously cited as a U.S. Environmental Protection Agency (USEPA) standard for household affordability, the guidelines as developed were intended to measure community-level *financial capability* for purposes of negotiating regulatory compliance
- 2019 Assessment indicates that there is currently a medium burden on the City and its residents
 - 46% of the City's customers, pay sewer bills in excess of the 2% household income threshold
 - 23% percent of the City's customers, pay sewer bills that exceed 5% household income

EPA's Financial Capability Assessment (FCA) Guidance Updated February 2023

- Currently updating our FCA
- 2019 -2023 will contribute to a worsening affordability
- Even with update true impact on low-income households may not be fully considered

NO Proposed Rate Changes

Residential Customer 4,100 Gallons Per Month Efficient Water Customer 45 GPD

	701120
=	= \$97.18
=	= \$16.00
x \$19.80/1,000 G	= \$81.18
=	= \$51.94
x \$.0292/100 G	= \$1.20
, , , , , , , , , , , , , , , , , , ,	= \$44.73
=	= \$6.01
	x \$10.91/1,000 G = x \$.0292/100 G = x \$19.80/1,000 G = =

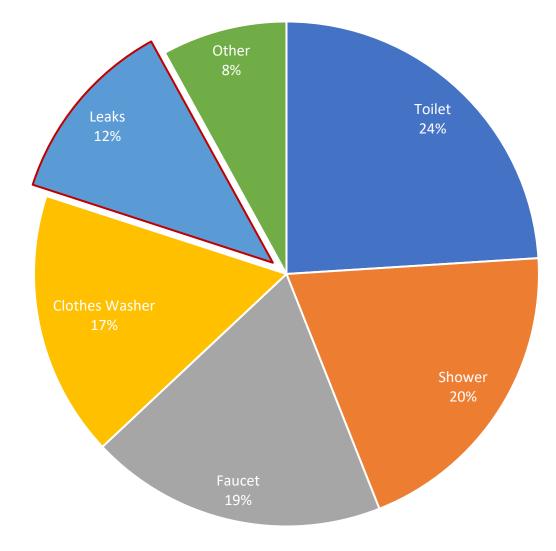
Yearly Water Bill = \$623.28 Yearly Sewer Bill = \$1,166.16 Yearly Total = \$1,789.44

Residential Customer 7,700 Gallons Per Month Average Water Customer 85 GPD

Customer Base Charge		= \$6.01
Water Charges	7,700 x \$10.91/1,000 G	= \$84.01
WQP Charge	7,700 x \$.0292/100 G	= \$2.25
Monthly Water Bill		= \$92.27
Sewer Charge	7,700 x \$19.80/1,000 G	= \$152.46
CSO Fixed Fee Charge		= \$16.00
Monthly Sewer Bill		= \$168.46
Monthly Bill Total		= \$260.73

Yearly Water Bill = \$1,107.24 Yearly Sewer Bill = \$2,021.52 Yearly Total = \$3,128.76

Residential Water Use



Newport has an Infrastructure Gap

ASCE - Rhode Island Infrastructure Grades

- Drinking Water C+, \$833 million drinking water investment gap
- Wastewater C, EPAestimated\$1.8billion in funding will be required

City of Newport - Underfunded or not Currently Funded (Today's Dollars)

- Drinking Water Underground Infrastructure (Pipes): \$375,000,000 (\$12.5 million/Year 30 Years)
- WPC Underground Infrastructure (Pipes): \$360,000,000 (\$12 million/Year 30 Years)
 - Wastewater Underground Infrastructure (Pipes): \$250,000,000 (\$8.4 million/Year 30 Years)
 - Stormwater Underground Infrastructure (Pipes): \$110,000,000 (\$3.6 million/Year 30 Years)
- North and South Easton Pond Dam \$20,000,000 to \$40,000,000
- Drinking Water Resiliency and Redundancy \$12,500,000
- North End Stormwater, Flood Mitigation, and Resiliency: \$50,000,000
- Lead and Copper Rule: \$9,375,000 \$18,750,000
 - Proposed Lead Poisoning Prevention Act, Adds Private Service Replacement to Water Utility \$25,000,000 to \$35,000,000
- Almy Pond Restoration \$30,000,000

Emerging Contaminants and Unknown Regulatory Standards

Per- and Polyfluoroalkyl substances – known as PFAS: UNKNOWN FISCAL IMPACT

Water Distribution Supply Mains Other **PVC Underground Infrastructure** 2% 2% WATER MAIN TIME PERIOD & USEFUL LIFE **Cement Lined** 10% Typical Useful Life 65 years – Unlined AC • Typical Useful Life 120 years - Cement Lined 36% 1940's -1970's Reinforced Concrete **Cast Iron** 16% US Failure Rate 25-30 Per 100 Miles/ Year AWWA Fully Optimized System Failure Rate 15 Per 100 Miles/ Year • (AWWA Partnership for Safe Water, 2011) Age Installation DI 34%

FAILURE VERSUS AGE

1990's – Today PVC

1800's – 1920's Iron

Typical Useful Life 100 years

Typical Useful Life 50 Years

Typical Useful Life 100 years

WATER MAIN FAILURE RATES

(Grigg, 2007; Deb et al., 2002)

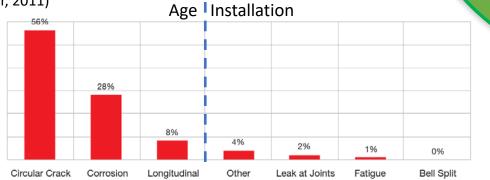
1970's – Today Ductile Iron

• Typical Useful Life 75+ years

1800's - 1960's Cast Iron

Reinforced Concrete Failures

- Installed 1960's 60%
- Installed 1970's 28%
- Installed 1980's 12%









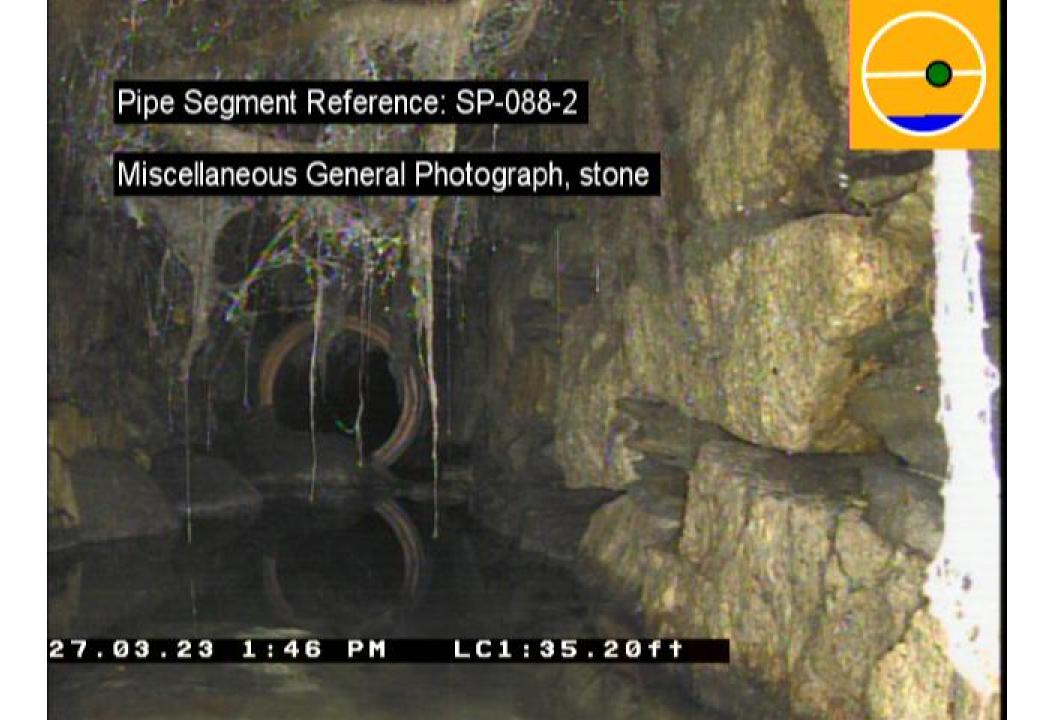
Common Failure Mode

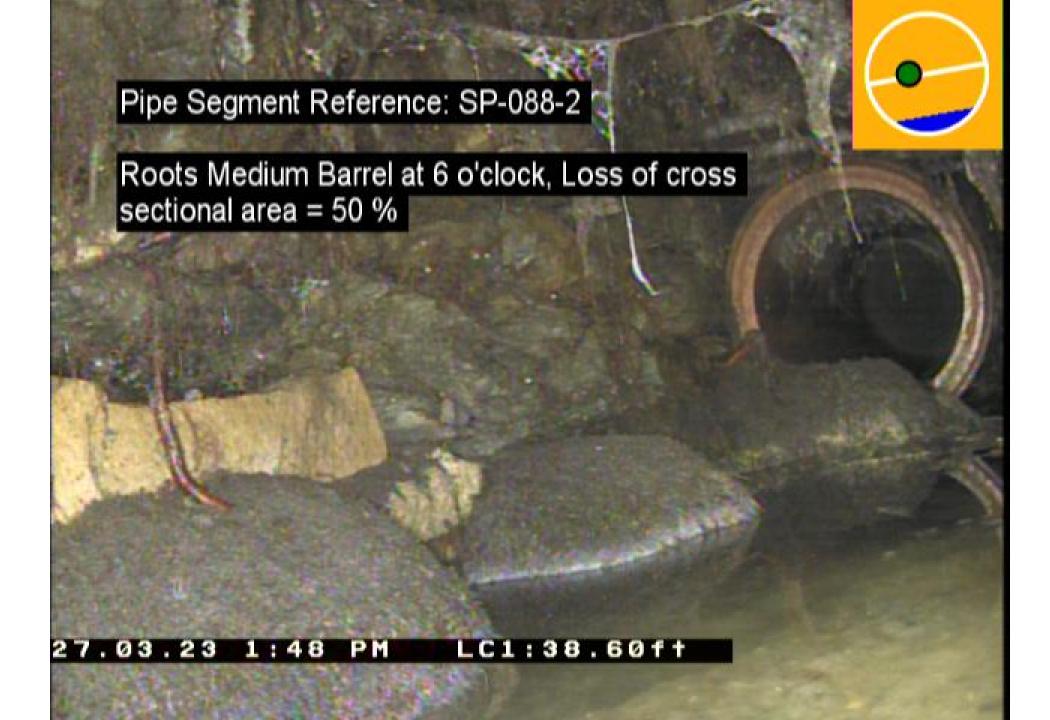






















Water Fund Current Recommend Capital Improvement Schedule

Water Project Title	Funding Source	Proposed FY 24	Proposed FY 25	Proposed FY 26	Proposed FY 27	Proposed FY 28	Total
Meter Replacement Program	Rates	\$100,000	\$125,000	\$150,000	\$175,000	\$200,000	\$950,000
Dam Rehabilitation	Rates	\$850,000	\$750,000	\$250,000	\$250,000	\$400,000	\$3,250,000
Water Trench Restoration	Rates	\$200,000	\$200,000	\$225,000	\$250,000	\$275,000	\$1,450,000
System Wide Main Improvements	Rates	\$200,000	\$200,000	\$200,000	\$500,000	\$1,100,000	\$2,700,000
Water Infrastructure Resilience Projects	Rates		\$250,000	\$750,000			
Fire Hydrant Replacement	Rates	\$125,000	\$150,000	\$175,000	\$200,000	\$200,000	\$1,050,000
Pump Station SCADA Project	Rates	-	-	-		\$100,000	\$350,000
IRP 5 Year Update	Rates	-	\$100,000	-	-	-	\$100,000
Reservoir Road 3MG Tank	Rates	\$1,600,500	-	-	-	-	\$1,600,500
Forest Ave Pump Station	Rates	\$200,000	\$100,000	\$350,000	\$850,000	-	\$1,500,000
GIS Update	Rates	\$100,000	-	-	-	-	\$100,000
Accounting/Billing System (Share)	Rates	\$126,500	\$126,500	\$126,500	-	-	\$379,500
WSSMP 5 Year Update	Rates	-	\$100,000	-	-	-	\$100,000
Equipment Replacement-Water	Rates	\$175,000	\$400,000	\$250,000	\$250,000	\$250,000	\$1,575,000
System Wide Main Improvements	SRF	\$500,000	\$2,500,000	\$250,000	-	-	\$3,250,000
Total Water Projects		\$4,177,000	\$5,001,500	\$2,726,500	\$2,475,000	\$2,525,000	\$18,355,000

Capital Improvement Schedule Some of the Underfunded or not Currently Funded Projects

Water Project Title	Funding Source	Proposed FY 24	Proposed FY 25	Proposed FY 26	Proposed FY 27	Proposed FY 28	Total
Dam Rehabilitation	Rates	\$7,150,000	\$7,250,000	\$7,750,000	\$7,750,000	\$7,600,000	\$37,500,000
System Wide Main Improvements	Rates	\$12,300,000	\$12,300,000	\$12,300,000	\$12,000,000	\$11,400,000	\$60,300,000
Water Infrastructure Resilience Projects	Rates	\$2,500,000	\$2,500,000	\$2,500,000	\$2,500,000	\$2,500,000	\$11,500,00
Lead Copper Rule	Rates	\$5,375,000	\$5,375,000	\$5,375,000	\$5,375,000	\$5,375,000	\$26,875,000
Total Water Projects		\$27,325,000	\$27,175,000	\$27,175,000	\$27,625,000	\$2,26,875,000	\$136,175,000

Water Pollution Control Fund Current Recommend Capital Improvement Schedule

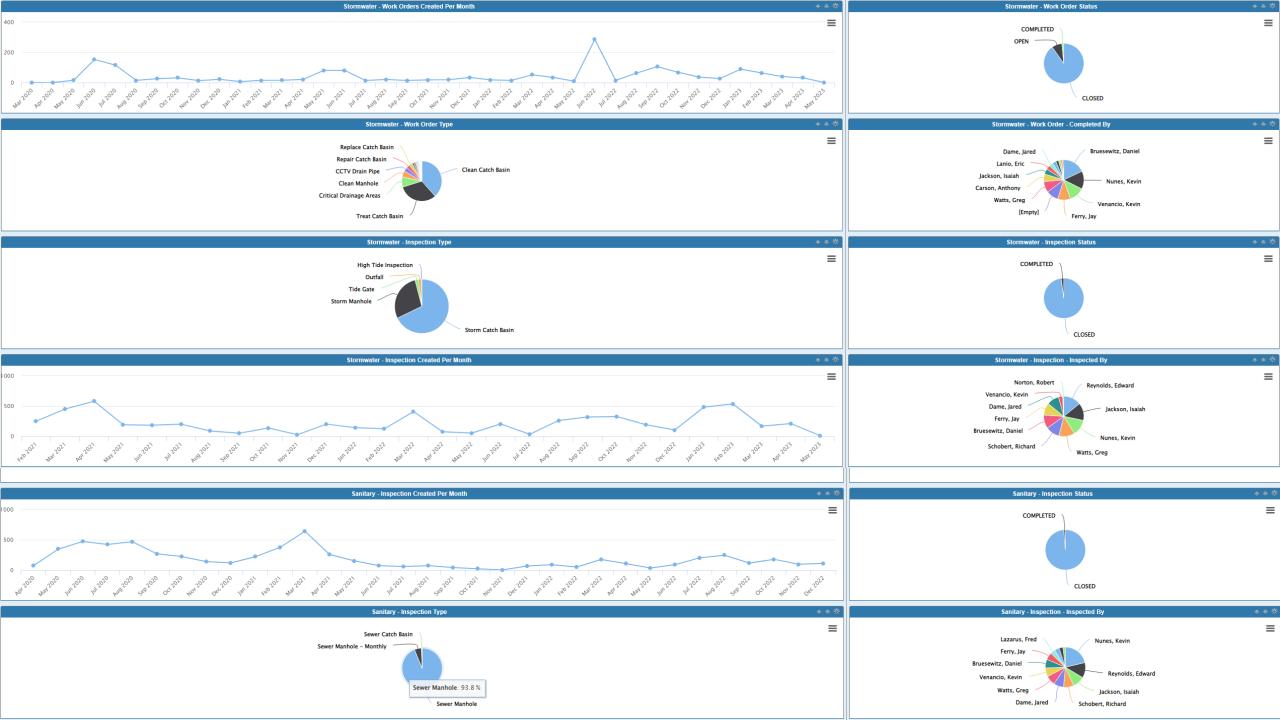
Water Pollution Control Project Title	Funding Source	Proposed FY 24	Proposed FY 25	Proposed FY 26	Proposed FY 27	Proposed FY 28	Total
Catch Basin Separation	CSO Fixed Fee	\$100,000	\$500,000	\$100,000	\$100,000	\$100,000	\$900,000
Storm Drain Improvements	CSO Fixed Fee	\$500,000	\$750,000	\$750,000	\$1,000,000	\$500,000	\$3,500,000
CSO System Master Plan Implementation	CSO Fixed Fee	\$500,000	\$500,000	\$500,000	\$500,000	\$500,000	\$2,500,000
Sewer Inflow & Infiltration Removal	CSO Fixed Fee	\$500,000	\$500,000	\$500,000	\$500,000	\$500,000	\$2,500,000
Flood Mitigation	WPC Rates	\$500,000	\$275,000	\$350,000	\$250,000	\$500,000	\$1,875,000
Sanitary Sewer Improvements	WPC Rates	\$900,000	\$750,000	\$1,000,000	\$825,000	\$1,050,000	\$4,525,000
WPC Trench restoration	WPC Rates	\$200,000	\$225,000	\$250,000	\$275,000	\$300,000	\$1,250,000
Equipment Replacement	WPC Rates	\$550,000	\$250,000	\$300,000	\$300,000	\$300,000	\$1,700,000
Total WPC Projects		\$3,750,000	\$3,750,000	\$3,750,000	\$3,750,000	\$3,750,000	\$18,750,000

Capital Improvement Schedule Some of the Underfunded or not Currently Funded Projects

Water Pollution Control Project Title	Funding Source	Proposed FY 24	Proposed FY 25	Proposed FY 26	Proposed FY 27	Proposed FY 28	Total
Storm Drain Improvements	CSO Fixed Fee	\$3,100,000	\$2,850,000	\$2,850,000	\$2,600,000	\$3,100,000	\$14,500,000
Almy Pond Restoration	WPC Rates	\$6,000,000	\$6,000,000	\$6,000,000	\$6,000,000	\$6,000,000	\$30,000,000
Flood Mitigation	WPC Rates	\$9,500,000	\$9,725,000	\$9,650,000	\$9,750,000	\$9,500,000	\$48,125,000
Sanitary Sewer Improvements	WPC Rates	\$7,500,000	\$7,650,000	\$7,400,000	\$7,575,000	\$7,350,000	\$37,475,000
Total		\$26,100,000	\$26,225,000	\$25,900,000	\$25,925,000	\$25,950,000	\$130,100,000

ASSET LIFECYCLE MANAGEMENT

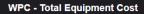




WPC - Total WO Cost

\$87,802.06

HED



\$27,135.45

HSD

WPC - Total Labor Cost

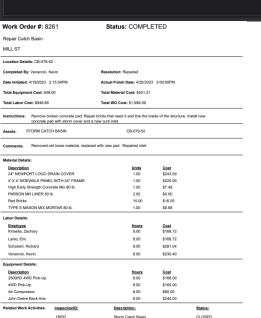
\$30,392.62

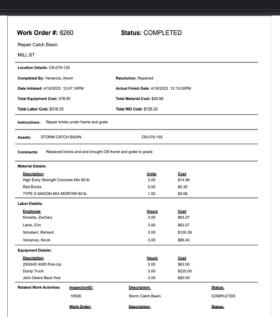
LIST

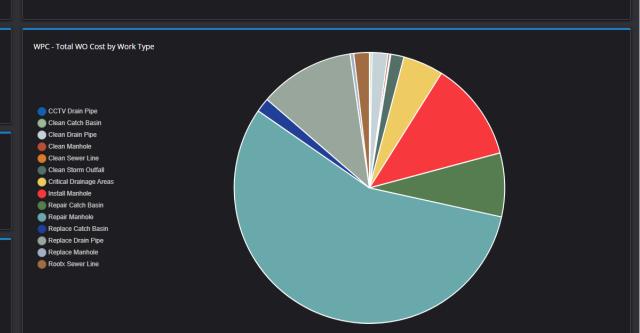
WPC - Total Material Cost

\$30,274.00

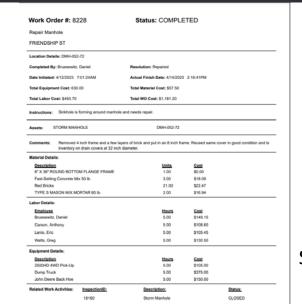
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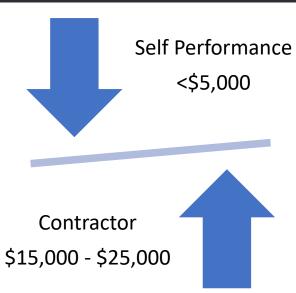


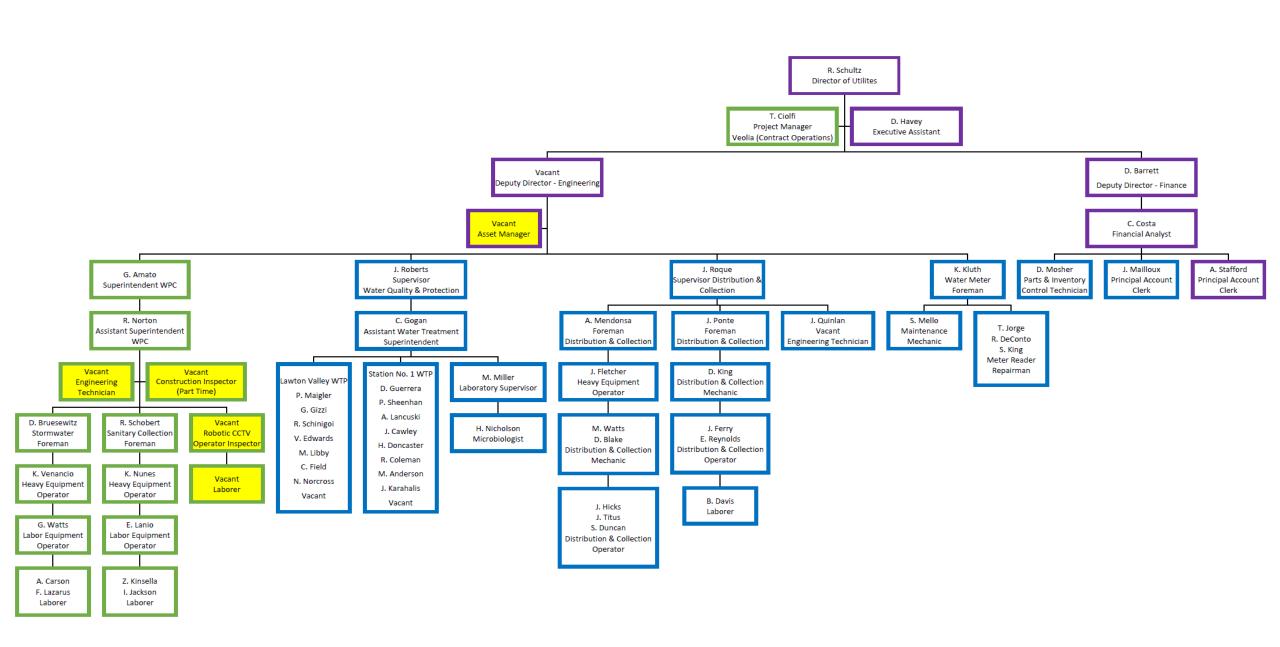


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WPC - Total WOs with Cost



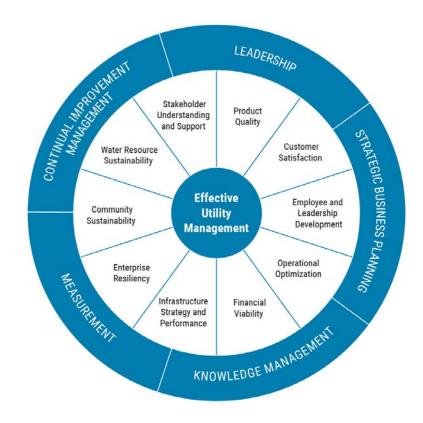


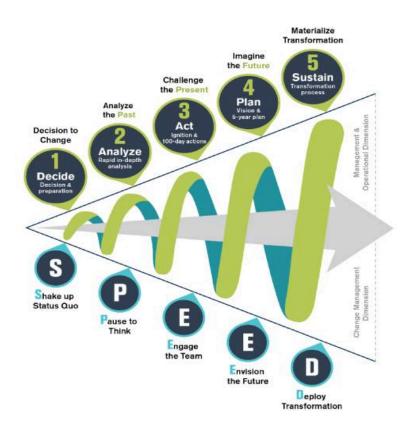
Utility of the Future

Utility of the Future (UoF) is defined as a future-focused utility that provides reliable, safe, inclusive, transparent, and responsive water supply and sanitation (WSS) services through best-fit practices that allow it to operate in an efficient, resilient, and sustainable manner.

World Bank Water Global Practice's - Utility of the Future Program (UoF)

Effective Utility Management - Collaborative Effort APWA, AWWA, ACWA, AMWA, ASDWA, NACWA, NAWA, WEF, WRF and U.S. EPA





TEN ATTRIBUTES OF EFFECTIVELY MANAGED WATER SECTOR UTILITIES

PRODUCT QUALITY

- REGULATORY COMPLIANCE
- SERVICE DELIVERY

CUSTOMER SATISFACTION

- CUSTOMER COMPLAINTS
- Customer service delivery
- CUSTOMER SATISFACTION

EMPLOYEE AND LEADERSHIP DEVELOPMENT

- EMPLOYEE RETENTION AND SATISFACTION
- Management of core competencies
- WORKFORCE DEVELOPMENT

OPERATIONAL OPTIMIZATION

- RESOURCE OPTIMIZATION
- Water management efficiency

FINANCIAL VIABILITY

- BUDGET MANAGEMENT EFFECTIVENESS
- FINANCIAL PROCEDURE INTEGRITY
- BOND RATINGS
- RATE ADEQUACY

WATER RESOURCE SUSTAINABILITY

- WATER SUPPLY ADEQUACY
- SUPPLY AND DEMAND MANAGEMENT
- WATERSHED SUSTAINABILITY

INFRASTRUCTURE STABILITY

- ASSET INVENTORY
- ASSET (SYSTEM) RENEWAL/REPLACEMENT
- WATER DISTRIBUTION/COLLECTION SYSTEM INTEGRITY
- INFRASTRUCTURE PLANNING AND MAINTENANCE

ENTERPRISE RESILIENCY

- RECORDABLE INCIDENTS OF INJURY OR ILLNESSES
- INSURANCE CLAIMS
- RISK ASSESSMENT AND RESPONSE PREPAREDNESS.
- ONGOING OPERATIONAL RESILIENCY
- OPERATIONAL RESILIENCY UNDER EMERGENCY CONDITIONS

COMMUNITY SUSTAINABILITY

- WATERSHED-BASED INFRASTRUCTURE PLANNING
- GREEN INFRASTRUCTURE
- GREENHOUSE GAS EMISSIONS
- SERVICE AFFORDABILITY
- COMMUNITY ECONOMIC DEVELOPMENT

STAKEHOLDER UNDERSTANDING AND SUPPORT

- STAKEHOLDER CONSULTATION
- STAKEHOLDER SATISFACTION
- INTERNAL BENEFITS FROM STAKEHOLDER INPUT
- COMPARATIVE RATE RANK
- Media/press coverage
- Partnering in your community

Example Performance Measures

Customer Service

- Call responsiveness (percent): 100 X (number of calls responded to within "X" minutes ÷ total number of calls)
- First call resolution (percent): 100 X (number of calls for which problem was resolved/fixed/scheduled to be fixed at the time of the first call ÷ total number of calls)

Product Quality

- Regulatory Compliance Rate (percent)
 - 100 X (number of days in full compliance for the year ÷365 days)
- Unplanned Service Interruptions(percent)
 - 100 X (number of active account customers experiencing a service interruption of greater than 1 hour ÷ total number of customers during reporting period)

Infrastructure Stability

(percent): 100 X (number of active account customers experiencing a service interruption of greater than 1 hour ÷ total number of customers during reporting period)

Distribution / Collection System Integrity

- Non-Revenue Water (NRW)
 - Water supplied to the network that does not return revenue to the utility, including unbilled authorized consumption, apparent losses (theft, customer metering inaccuracies, systematic data handling errors), and real losses (leakage from the pipe network and distribution storage)
- Wastewater System Integrity
 - Percent:100X (number of failures ÷ total miles of pipe)
- Noncapacity Overflow Rate
 - SSO Overflow Rate: 100X (Number of SSO ÷ total miles of pipe)
- Capacity Overflow Rate
 - CSO Overflow Rate: 100X (Number of CSO ÷ total miles of pipe)

System Renewal / Replacement

- Asset Renewal/Replacement Rate
 - Distribution or Collection Systems Replacement: 100X (Miles or pipe rehabilitated or replaced ÷ total miles of pipe)