



King County

1200 King County
Courthouse
516 Third Avenue
Seattle, WA 98104

Meeting Agenda Regional Water Quality Committee

Councilmembers:
Claudia Balducci, Chair
Reagan Dunn, Rhonda Lewis

Sound Cities Association: *Vice Chair, Laura Mork, Shoreline; Dave Hamilton, Bellevue; Sarah Moore, Burien; Jessica Rossman, Medina*

Alternates: *Hanan Amer, Auburn; Melissa Stuart, Redmond*

Sewer/Water Districts: *Chuck Clarke, Woodinville Water District; Lloyd Warren, Sammamish Plateau Water District*

Alternate: *Ryika Hooshangi, Sammamish Plateau Water*

City of Seattle: *Joy Hollingsworth, Eddie Lin*
Alternate: *Rob Saka*

Non-Voting Member: *John McClellan, Metropolitan Water Pollution Abatement Advisory Committee*

Lead Staff: *Jenny Giambattista (206-477-0879)*
Committee Clerk: *Angelica Calderon (206-477-0874)*

3:00 PM

Wednesday, August 5, 2026

Hybrid Meeting

SPECIAL MEETING

Hybrid Meetings: Attend this King County Council committee meeting in person in Southwest Conference Room - 12th Floor King County Courthouse 516 3rd Avenue, Seattle WA 98104, or through remote access. Details on how to attend and/or to provide comment remotely are listed below.

Pursuant to K.C.C. 1.24.035 A. and F., this meeting is also noticed as a meeting of the Metropolitan King County Council, whose agenda is limited to the committee business. In this meeting only the rules and procedures applicable to committees apply and not those applicable to full council meetings.

HOW TO PROVIDE PUBLIC COMMENT: The Regional Water Quality Committee values community input and looks forward to hearing from you on agenda items.

	Sign language and interpreter services can be arranged given sufficient notice (206-848-0355). TTY Number - TTY 711. Council Chambers is equipped with a hearing loop, which provides a wireless signal that is picked up by a hearing aid when it is set to 'T' (Telecoil) setting.	
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The Committee will accept public comment on items on today's agenda in writing. You may do so by submitting your written comments to Committees@kingcounty.gov. If your comments are submitted before 1:30 p.m. on the day of the meeting, your comments will be distributed to the committee members and appropriate staff prior to the meeting.

HOW TO WATCH/LISTEN TO THE MEETING REMOTELY: There are three ways to watch or listen to the meeting:

- 1) Stream online via this link: www.kingcounty.gov/kctv, or input the link web address into your web browser.
- 2) Watch King County TV on Comcast Channel 22 and 322(HD) and Astound Broadband Channels 22 and 711(HD).
- 3) Listen to the meeting by telephone.

Dial: 1 253 215 8782

Webinar ID: 827 1536 1574

To help us manage the meeting, please use the Livestream or King County TV options listed above, if possible, to watch or listen to the meeting.

To show a PDF of the written materials for an agenda item, click on the agenda item below.

1. [Call to Order](#)
2. [Roll Call](#)
3. [Approval of Minutes](#) **p. 4**
July 1, 2026 meeting minutes
4. [Chair's Report](#)
5. [MWPAAC Report](#)
6. [Wastewater Treatment Division Report](#) **p. 7**



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Briefing

7. [Briefing No. 2026-B0091](#) **p. 14**
Department of Ecology, Washington's Water Future Initiative
Jennifer Hennessey, Special Assistant to the Director, Department of Ecology, State of Washington
8. [Briefing No. 2026-B0092](#) **p. 27**
Integrating Financial and System Sustainability: Financial Planning, Risk Assessment, and Performance Metrics
Ed Cebron, Rate and Finance Consultant
9. [Briefing No. 2026-B0093](#) **p. 42**
Regional Wastewater Services Plan Update Policy Questions Initial Analysis Group 6: Combined System Management
Darren Greve, Government Relations, Wastewater Treatment Division (WTD)
Janice Johnson, Project Manager, Regional Wastewater Services Plan Update, WTD
Faon O'Conner, Program Manager, Combined Sewer Overflow, WTD
Caitlyn Hall, Chief Financial Officer, WTD
10. [Briefing No. 2026-B0002](#) **p. 87**
Discussion of 2026 Regional Water Quality Committee Work Program
Jenny Giambattista, Council staff

Adjournment

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Meeting Minutes Regional Water Quality Committee

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City of Seattle: Joy Hollingsworth, Eddie Lin
Alternate: Rob Saka

Non-Voting Member: John McClellan, Metropolitan Water
Pollution Abatement Advisory Committee

Lead Staff: Jenny Giambattista (206-477-0879)
Committee Clerk: Ryleigh Brimhall (206-263-2152)

3:00 PM

Wednesday, July 1, 2026

Hybrid Meeting

DRAFT MINUTES

1. **Call to Order**

Chair Balducci called the meeting to order at 3:00 p.m.

2. **Roll Call**

Present: 13 - Balducci, Clarke, Dunn, Hamilton, Hollingsworth, Lewis, Moore, Mork,
Warren, Lin, Amer, Stuart and Hooshangi

Excused: 2 - McClellan and Rossman

3. **Approval of Minutes**

*Council President Stuart moved approval of June 3, 2026, meeting minutes. There
being no objections, the minutes were approved.*

4. **Chair's Report**

Chair Balducci provided an overview of the agenda items.

5. MWPAAC Report

This item was not held.

6. Wastewater Treatment Division Report

Kamuron Gurol, Director, Wastewater Treatment Division, commented on letters to Wastewater Treatment Division about the sewer rate, the Sewer Rate & Capital Work Plan, and highlighted on the recent tours of the South Plant.

Discussion and Possible Action**7. [Proposed Ordinance No. 2026-0162](#)**

AN ORDINANCE relating to the capacity charge methodology; and amending Ordinance 13680, Section 1, as amended, and K.C.C. 28.86.010 and Ordinance 13680, Section 16, as amended, and K.C.C. 28.86.160.

Andy Micklow, Council staff, answered questions from the members.

This item was expedited to the next July 7th, 2026 meeting of Metropolitan King County Council.

Due to the design of the legislative tracking software used to produce the proceedings, the vote on this item is misreported. The correct vote is:

Yes: 7 - Hamilton, Mork, Moore, Stuart (voting as an alternate for Rossman), Clarke, Lewis and Balducci

No: 2 - Dunn

Excused: 3.5 – Rossman, Hollingsworth, Lin, Warren

A motion was made by Vice Chair Mork that this ordinance be recommended do pass. The motion carried by the following vote:

Yes: 6.5 - Balducci, Clarke, Hamilton, Lewis, Moore, Mork, Warren and Stuart

No: 2 - Dunn

Excused: 5 - Hollingsworth, McClellan, Rossman, Lin, Amer and Hooshangi

Briefing

8. [Briefing No. 2026-B0084](#)

Regional Wastewater Services Plan Update Policy Questions Initial Analysis Group 5:
Finance/Affordability

Wastewater Treatment Division employees, including Darren Greve, Government Relations, Janice Johnson, RWSP Project Manager, Caitlyn Hall, Chief Financial Officer, and Andrés Bas Moore, Rates & Financial Planning Supervisor, briefed the committee and answered questions from members.

This matter was Presented

9. [Briefing No. 2026-B0002](#)

Discussion of 2026 Regional Water Quality Committee Work Program

Chair Balducci updated the committee on the status of the work plan.

This matter was Deferred

Other Business

There was no further business to come before the committee.

Adjournment

The meeting was adjourned at 4:22 p.m.

Approved this _____ day of _____

Clerk's Signature

Regional Water Quality Committee

Item 6

Director's Report:

Wastewater Treatment Division

Capital Project Report

August 5, 2026

Wastewater Treatment Division (WTD’s) Sewer Rate and Capital Work Plan to Continue to Improve Engagement, Transparency, and Accountability – August 5, 2026, Status Update

Note: Changes from the last month’s update are in bold, blue font.

Major Recommendations from RWQC Letter	Wastewater Treatment Division Tasks	Working Timeline	
1. Meaningful and Timely Engagement in Development of Sewer Rate. For the 2027 rate process and on-going, Wastewater Treatment Division (WTD) should implement an updated rate process that includes: a. Regular discussions throughout the year with the Metropolitan Water Pollution Abatement Advisory Committee (MWPAAC), Regional Water Quality Committee (RWQC), and King County Council at the relevant level of detail for each body on key factors and assumptions affecting the rate and forecast. This includes transparency on capital improvement program assumptions. b. Time for more in-depth review and understanding of costs, discussion of specific rate scenarios/options, and effects during rate discussions with MWPAAC, RWQC, and other stakeholders, at the relevant level of detail for each body. c. Ensure that the long-term rate forecast methodology requested by Motion 16449 is used to develop scenarios to evaluate options.	- To promote meaningful and timely engagement, WTD will host regular meetings with MWPAAC and/or its subcommittees to review: 10-year Capital Improvement Program. - Project prioritization, including transparency on how decisions are made and policy drivers of capital prioritization. - Timely updates on changes in large project costs that may impact rates as information becomes available. - Expenditure forecast assumptions and impacts to different types of projects across the capital program.	Q4 2025 and ongoing	Briefings provided on WTD’s capital project prioritization process and key capital projects impacting the rate in Q3/Q4 2025. Most recently, MWPAAC received a Capital Projects briefing on June 24, 2026. A draft rate engagement calendar for Q4 2026 – Q2 2027 is in development and will be shared with MWPAAC’s Executive Board for input at their August 26 meeting.
	Work with King County Executive's Office to schedule early 'look ahead' presentations on known and potential factors affecting the 2027 rate proposal and forecast.	Q1/Q2 2026	“Look Ahead” briefings to MWPAAC scheduled for Q4 2025 and Q1 2026. WTD briefed MWPAAC on 1/28/26 on the rate strategy for 2027 and assumptions. WTD provided a preliminary sewer rate and capacity charge briefing to MWPAAC on 2/5/26 and 2/25/26, and a briefing on WTD’s proposed rate on 3/5.
	As part of the 2027 rate proposal, include options for multiple rate scenarios, including those that offer various capital portfolio options. Scenarios should detail tradeoffs and associated risks and benefits. This should include a discussion about the level of service WTD is able to deliver under each option.	Q2 2026	WTD presented preliminary scenarios for illustrative purposes to RWQC on 2/4/26 and MWPAAC Rates and Finance Subcommittee on 2/5/26, and as part of WTD’s proposed rate on 3/5/26. Two scenarios, in addition to the Executive’s proposed rate, are included in the Technical Memorandum transmitted to Council with proposed Ordinance 2026-0103.
	The report on long-term forecasting model required by Motion 16449 was presented to RWQC in September 2025. To increase transparency and credibility in the long-term forecasting model, WTD will work with a MWPAAC work group to identify the model details that should be shared and	Q3 2025 and ongoing	An independent consultant selected by MWPAAC members briefed MWPAAC on 1/28/26 and a video of the presentation can be found here. Further briefings on implementation of the long-term forecasting model will be provided to

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Major Recommendations from RWQC Letter	Wastewater Treatment Division Tasks	Working Timeline	
	further refined in order to improve understanding of the assumptions, formulas, data sets, and policy implications embedded in the long-term rate model and allow for informed questions. The MWPAAC work group should identify areas of improvement to continue to align with industry best practices to inform suggestions for improvements. • Work with MWPAAC Executive Board member(s) to develop a process for members to observe WTD Capital Portfolio management staff meetings while not hampering WTD's process and progress.	Q1/Q2 2026	MWPAAC with an opportunity to suggest any further improvements to align with industry standards. A briefing on the long-term forecast model and refinements is tentatively scheduled for MWPAAC’s Rates and Finance Subcommittee on October 1, 2026. WTD is engaged with MWPAAC’s Executive Board to provide an opportunity to observe the Definition and/or Delivery Board meetings in the Portfolio Management process beginning in Q1 2026. MWPAAC’s Executive Board selected two representatives to attend WTD Capital Portfolio management meetings beginning in Q2 2026. The two MWPAAC representatives attended an orientation on WTD’s governance board structure on June 22 and their first WTD Project Oversight Board on July 7, 2026.
2. Early visibility and transparency on large project planning. Develop mechanisms for MWPAAC and RWQC to engage in the planning and development process for large capital projects prior to decision-making to improve knowledge and confidence.	• Develop and implement a process for MWPAAC and RWQC (as requested) to review a limited number of large capital projects selected by MWPAAC that substantively affect the rate. These reviews will happen at key phases in the development of these selected projects, including concept definition, alternatives analysis, alternative selection, and final design. Each engagement will create an opportunity to influence outcomes by collaboratively discussing comments and questions with WTD before a decision in each phase identified above is finalized.	Q1 2026	MWPAAC representatives’ attendance at WTD Project Oversight Board meetings will help inform MWPAAC members regarding WTD’s process for project prioritization and decisions. The topic of alternatives analysis for selected projects will be revisited at the next MWPAAC Executive Board in Q3 2026.

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Major Recommendations from RWQC Letter	Wastewater Treatment Division Tasks	Working Timeline	
3. Improve multi-year rate predictability. Develop options and implement a mechanism to improve rate predictability to help partner agencies better plan and lessen large changes in rate proposals, especially for the first three years of the rate. A multi-year rate would provide more time for an in-depth review and understanding of costs and how investments are prioritized, and discussion of options and tradeoffs.	Prepare and deliver options for multi-year rate predictability, including options for a multi-year rate commitment. Options should be prepared in discussion with MWPAAC’s Executive Board and partner agencies and in coordination with King County Executive’s Office and county budget process. Any multi-year option should include a process for WTD to update the rate if there are significant changes that impact the rate forecast.	Q3 2025 – Q2 2026 (Options identified by end 2025 and multi-year rate implementation by end of Q2 2027 for 2028 and 2029 rates)	WTD began discussions with MWPAAC’s Executive Board and King County’s budget office in Q3/Q4 2025 on options for rate predictability. MWPAAC received an initial briefing and provided feedback on potential options at its 12/4/25, Rates and Finance Subcommittee meeting. Further discussion of options for rate predictability is planned for MWPAAC’s Rates and Finance Subcommittee on June 4, 2026. Based on feedback from MWPAAC and local agency partners on the options, WTD plans to recommend a two-year rate for 2028-2029 to help with predictability and align with the County’s biennial budget. The sewer contracts still require the Council to adopt the rate annually.
4. Evaluate regulatory requirements and develop options to address financial sustainability. Evaluate consent decree and permit deadlines for major projects and investments associated with multiple and concurrent requirements and identify options to address financial sustainability while optimizing water quality benefits and maintaining permit compliance.	- Evaluate the costs/benefits of seeking regulatory changes to improve the environmental and financial sustainability of the regional system. - Coordinate on outreach plan with local agency partners, to state and federal government. The outreach plan should address regulatory issues and funding availability from state and federal agencies.	Q3 2025 – 2026 Q3 2025 – 2026	WTD’s Planning team is coordinating with the King County Prosecuting Attorney’s Office and County Executive’s Office to evaluate potential regulatory changes. WTD is exploring options for an environmentally protective and financially sustainable path in preparation for initiating discussions with regulators. WTD met with Washington State Department of Ecology on June 24 and July 30. WTD is initiating outreach with its local agency partners on a federal/state outreach strategy. WTD and Seattle Public Utilities (SPU) coordinated on delegation meetings as part of Water Week (April 12 – 18, 2026) in Washington, D.C. Additionally, WTD is coordinating with City of Bellevue on key messages in advance of the city’s D.C. trip in June 2026. WTD shared information

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Major Recommendations from RWQC Letter	Wastewater Treatment Division Tasks	Working Timeline	
			with local agency government relations on EPA’s comment period for the Financial Capability Assessment guidance which closed May 26. WTD staff briefed MWPAAC on June 26 regarding the draft discharge permit for West Point Treatment Plant issued by Ecology which includes requirements for nutrients. MWPAAC is submitting a comment letter on the draft permit to Ecology.
5. Independent, third-party oversight. Provide for independent third-party review for WTD's capital program, including <i>mega</i> capital projects such as the Mouth of Duwamish Combined Sewer Overflow Program.	Develop a proposal in coordination with MWPAAC's Executive Board for review by the Executive's Office to procure an independent consultant to review WTD's capital program, including large capital projects.	Q4 2025 – Q2 2026	WTD provided an opportunity for MWPAAC’s Executive Board to review the scope of work to procure an independent third-party consultant. The King County Auditor’s Office has agreed to serve as the Project Representative. MWPAAC has selected a representative from its Executive Board to participate in the consultant proposal and interview process. The advertisement for the independent consultant contract opened on 2/10/26 and closed on 3/11/26. The selected consultant, PMA Consultants , executed a contract with WTD and received notice to proceed on June 11. The consultant held a kick-off meeting on June 25 with the King County Auditor’s Office as the project manager.
6. Regional Utility Affordability Summit. In partnership with local municipal leaders, prepare a multi-jurisdictional summit to address affordability and access to essential utilities.	Work with RWQC, Sound Cities Association, Seattle, and sewer districts to bring a wastewater perspective to the development and planning of the regional utility affordability summit.	Q3 2025 – Q1 2026	The Regional Utility Rate Summit was held in SeaTac on November 14, 2025, with approximately 150 attendees. WTD participated in the Staff Committee and Steering Committee for planning the Summit and as a participant presenting at the Summit.
	Identify and implement resources to execute follow-up steps	Q4 2025-Q1 2026	

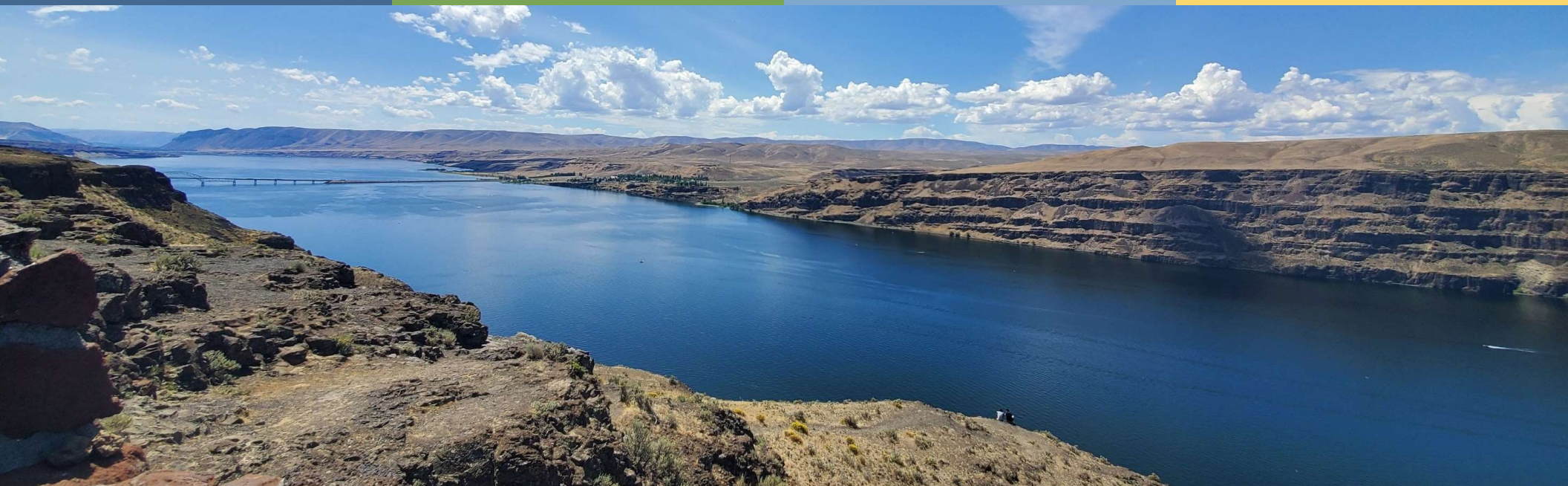
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Major Recommendations from RWQC Letter	Wastewater Treatment Division Tasks	Working Timeline	
	agreed upon at the summit. Develop public engagement strategy for rate payers in coordination with local contract agencies to explain why wholesale WTD rates are increasing and provide opportunities for public engagement.	Q1 2026	Follow-up will be coordinated with participants, including a potential second summit in 2026. Sound Cities Association (SCA) and County staff participated in a discussion with MWPAAC at its April 28 General Meeting to solicit input on next steps. WTD and SCA staff met in May to consider this initial input and how it would shape a second summit. WTD will continue to gather input from interested parties. The Department of Natural Resources and Parks and WTD met with Sound Cities Association on June 16 and again on July 20 regarding a second summit. Discussions are continuing. WTD held two sessions in January 2026 with local agency public information officers and similar staff to gather feedback. The sessions included discussion of what local agencies are hearing from customers, more information on current outreach efforts, and ideas for coordination with WTD on rate messages. This feedback will inform WTD’s communications strategy development in Q1/Q2 2026. WTD hosted a virtual meeting local agency public information staff on 4/28/26 and shared a communications tool kit for the proposed 2027 sewer rate. WTD’s Director also participated in an interview with Bellevue TV regarding utility rates. In response to comments received, WTD will develop a bill stuffer or something similar that local sewer agencies can send to customers explaining the King County wastewater rate increase for 2027 and the importance of the regional system in protecting public health and the

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Major Recommendations from RWQC Letter	Wastewater Treatment Division Tasks	Working Timeline	
			environment. WTD provided information on the adopted 2027 sewer rate to local agency communications staff to help with coordinated messaging to ratepayers.

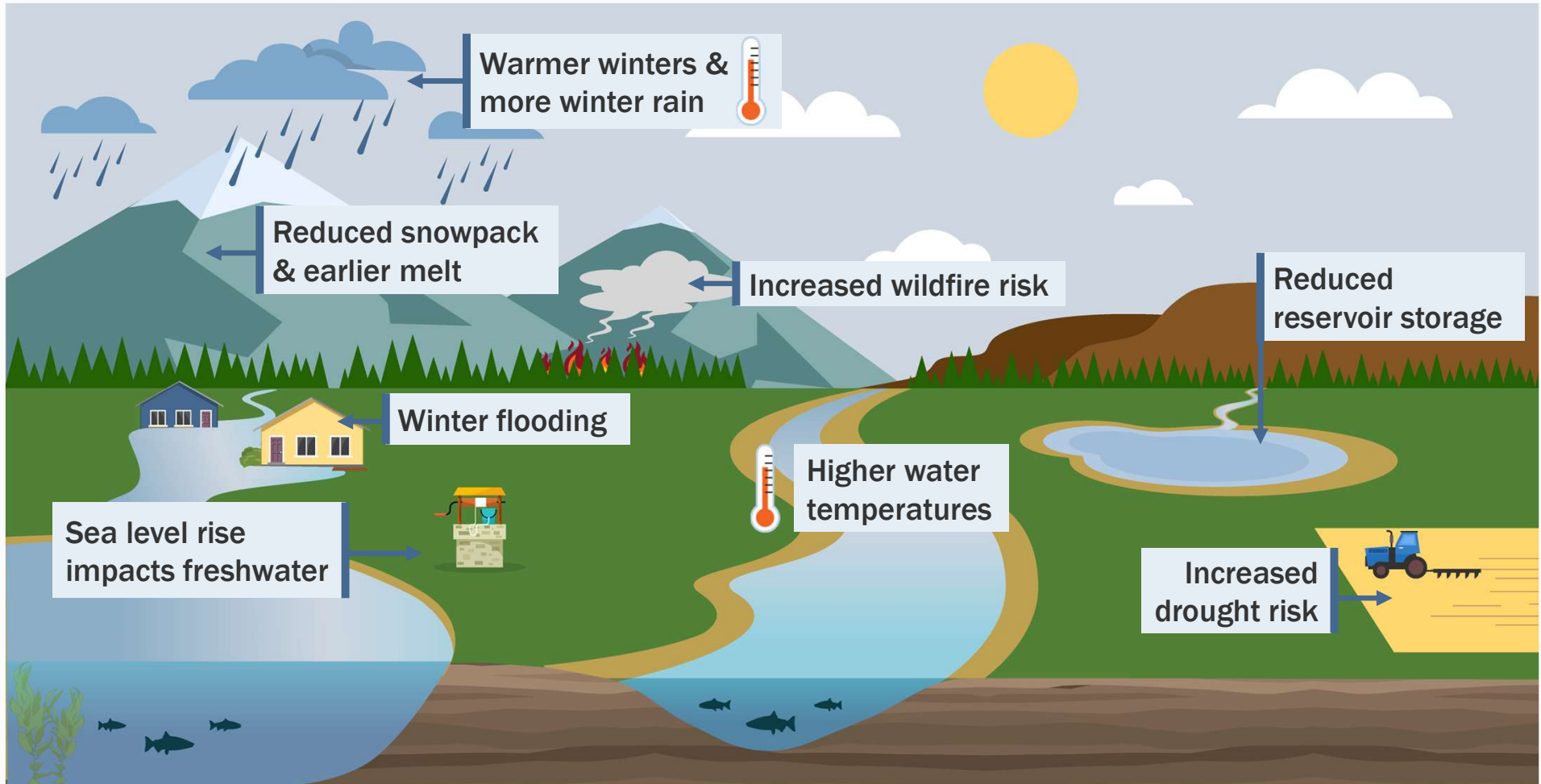


Washington's Water Future Initiative

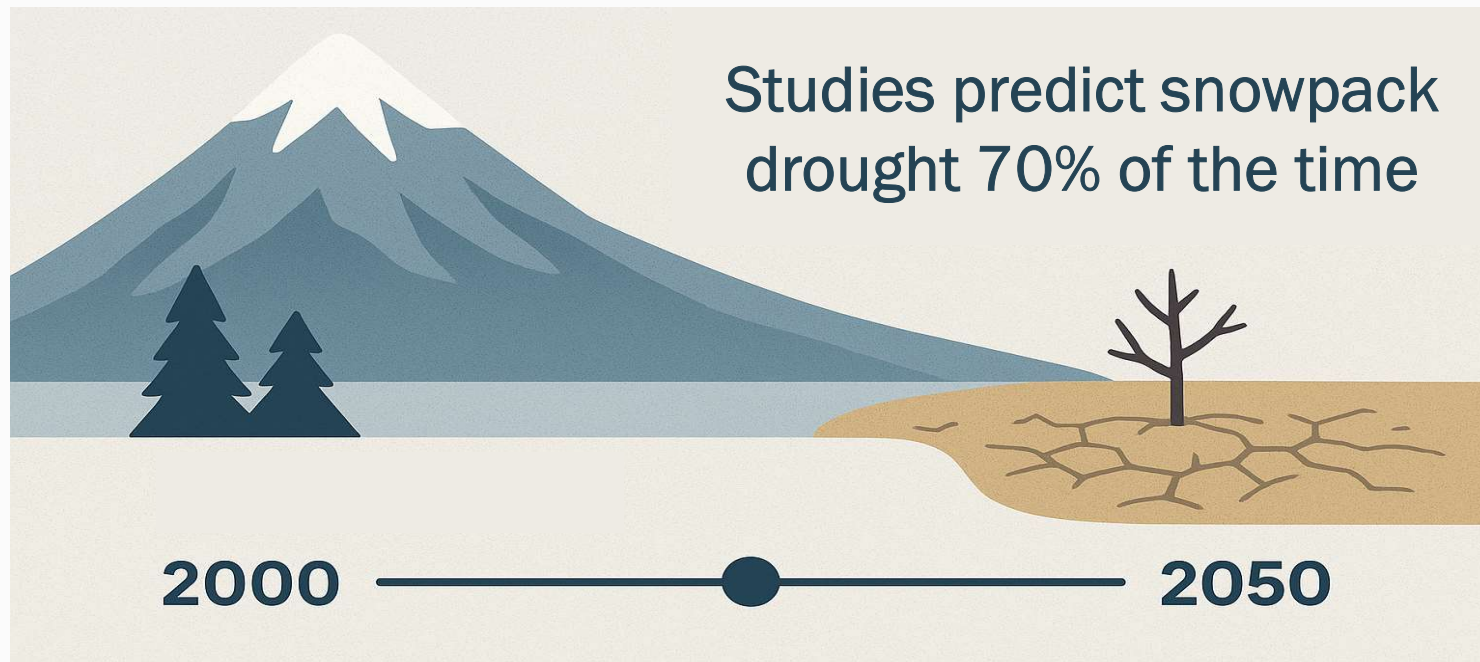
Regional Water Quality Committee

August 5, 2026

Why now? Climate impacts on Washington's Water

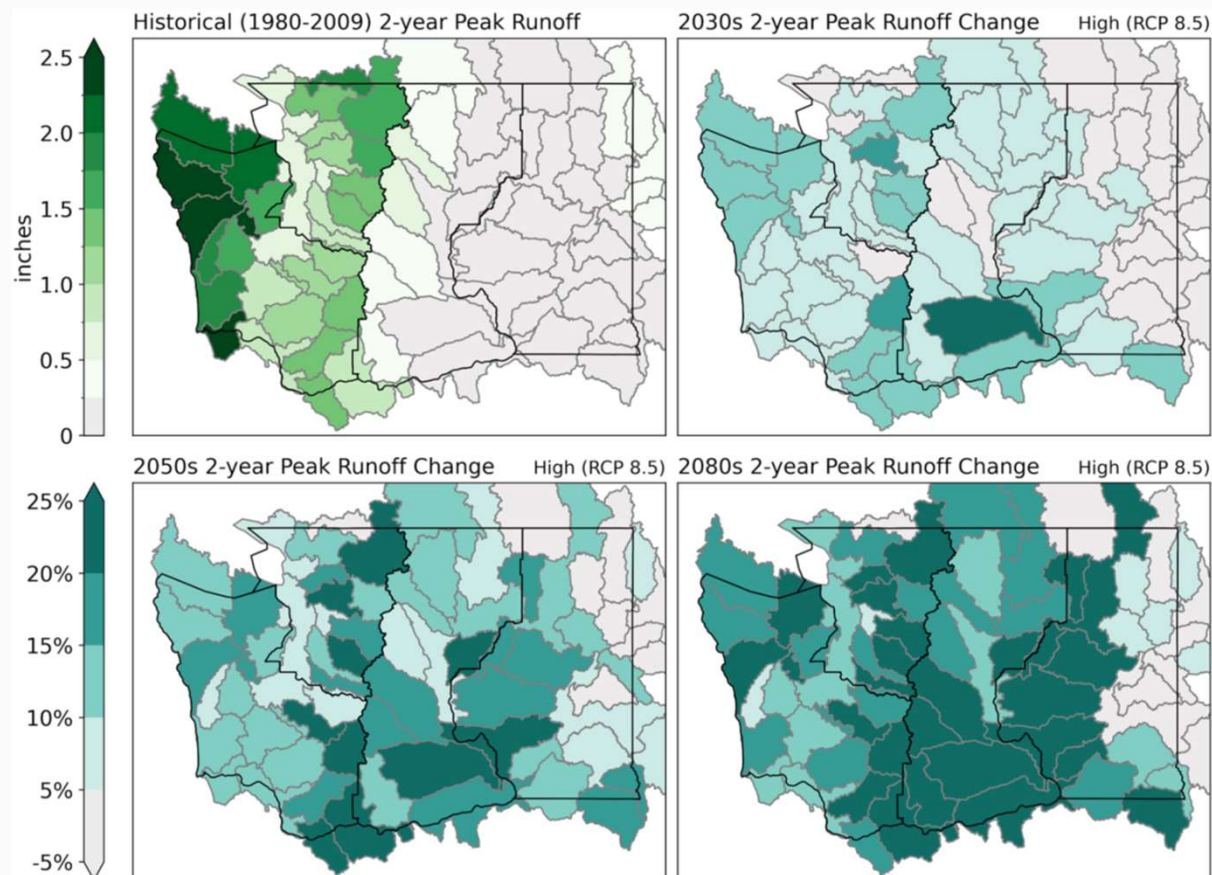


Drought patterns – The future



Our infrastructure and ecosystems are designed for precipitation and temperature patterns that are no longer an indicator of future patterns. ³

Statewide projections: River Flooding – 2-year flood



Source:
Washington State
Climate Resilience
Strategy

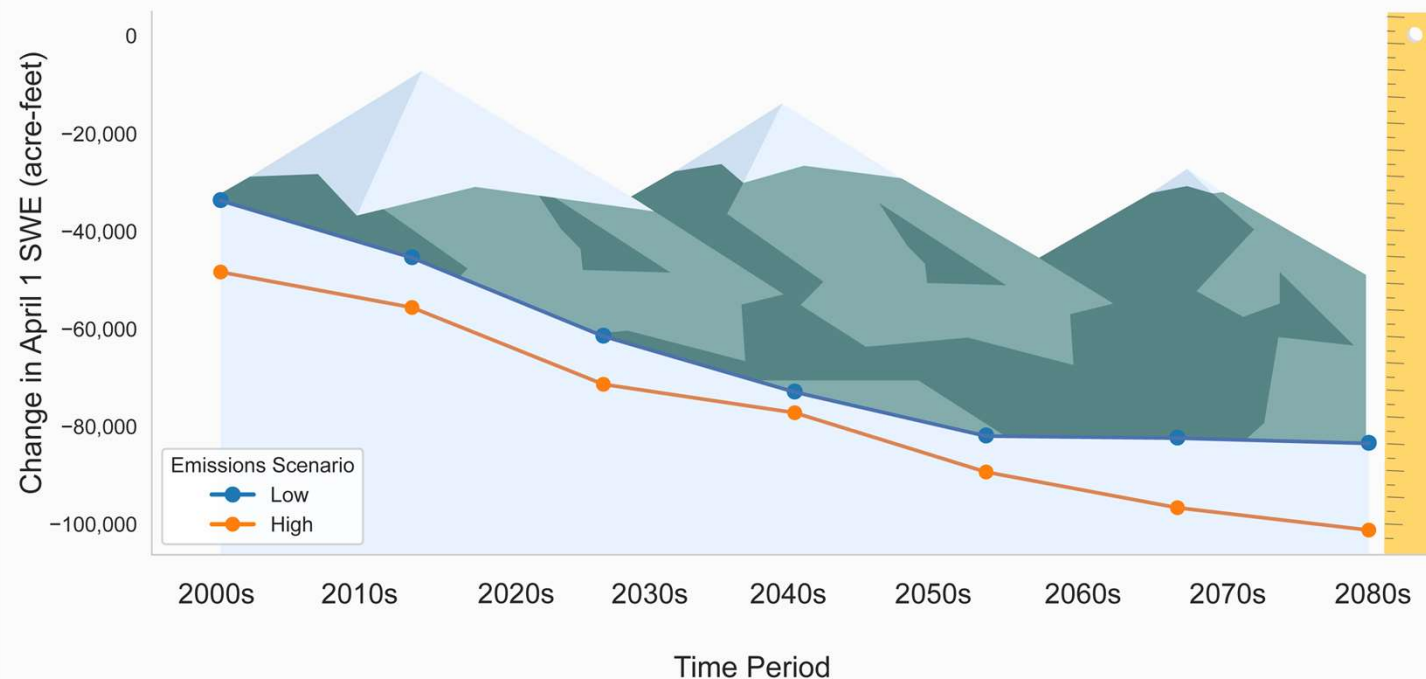
Appendix A:
Washington climate
projections:
Summary by region
prepared by
University of
Washington Climate
Impacts Group

Duwamish-Green

Snowpack by April 1 Snow Water Equivalent (SWE)



Projected April 1 Snow Water Equivalent Change (acre-feet)



Less snowpack means **higher streamflows in winter** and **lower in summer**

Impacts



Reduced natural seasonal storage



Increased need for managed storage to meet peak demands

+ Drier soils earlier equals longer windows for **wildfires**

Additional Drivers



Housing



Water quality



State and local
requirements



Growth



Ecosystem health

Proven solutions exist that lessen the impact



Water supply



Above ground
reservoirs



Below ground
aquifer storage



Natural storage



**Water
data**



Planning



Legal



**Water
demand**



Reuse



Conservation

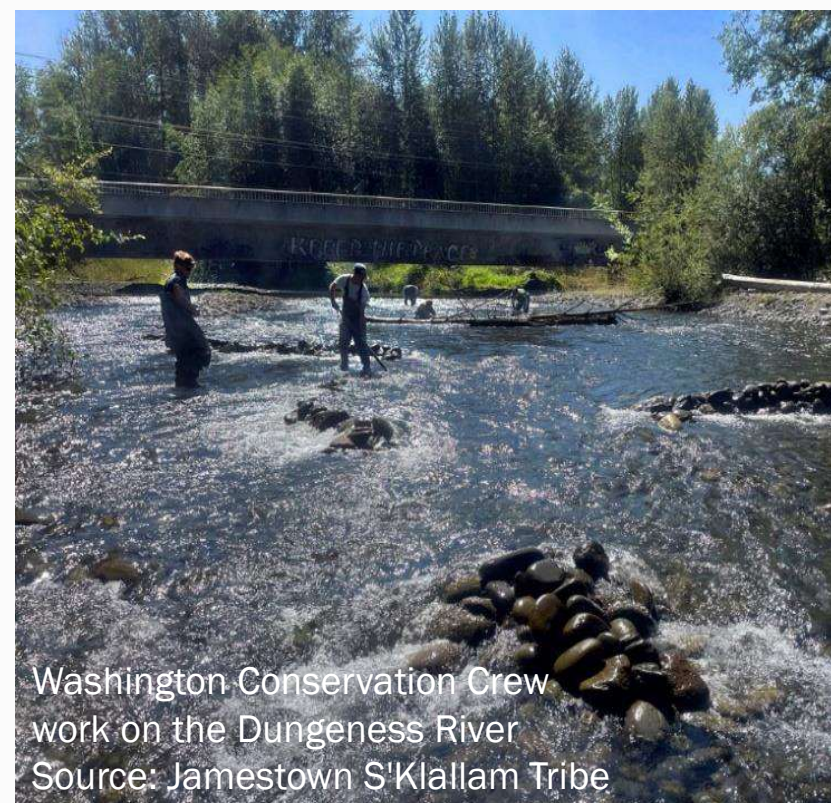


Efficiency

Washington's Water Future

Initiative Goals

- To build a shared understanding among diverse groups about our greatest water challenges.
- Foster broader and integrated conversations about **solutions** and help us begin to design a shared future together.



Timeline

Summer

- Ecology-led outreach
- Additional engagement
- Develop online tool

Fall

- Report on roundtables
- ID Near-term Actions
- Online tool release

Winter and beyond

- Outreach and engagement based on Governor's direction

Washington's Water Future: Engagement overview



Regional roundtables (in-person)

Interest group & Tribal input
sessions (virtual)

Public input sessions (virtual)

Existing collaboratives' meetings



Additional virtual input opportunities

Online public input survey

- Open now through Aug. 31



Interest-based input sessions

- Water Utilities and Local Governments - Aug. 13, 1 - 4 p.m.
- Tribal input session (#2) – Aug. 18, 2 - 4 p.m.

Learn more and stay up-to-date



Visit Ecology's website to:

- Read more about the initiative and climate trends
- Sign-up for email updates





Questions?

Jennifer Hennessey
Special Assistant to the Director –
Climate Resilience
Jennifer.Hennessey@ecy.wa.gov

Regional Water Quality Committee

Integrating Financial and System Sustainability

August 5, 2026

Edward Cebron, Consultant

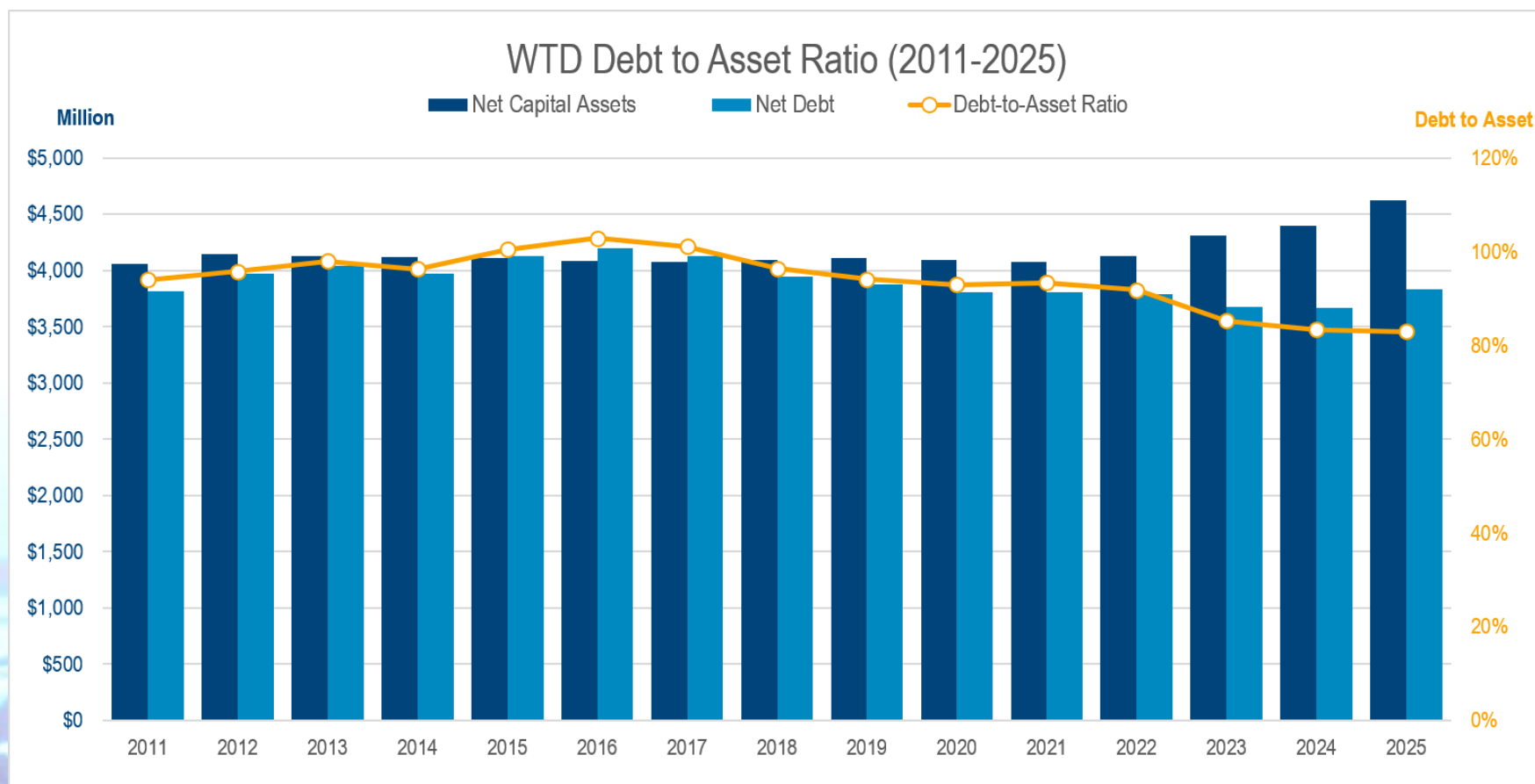
Focus of This Review

- I. Review WTD Financial Planning Tools, Methods and Status**
- II. Develop Practical Financial Performance Metrics for Sustainability**
- III. Integrate Financial Policy with Infrastructure Sustainability**

WTD Analytical Tools

- I. Financial model is robust and capable; data development is less robust**
 - a) Asset Management and risk assessment need to evolve
 - b) Need to develop improved estimate of system replacement costs
- II. Longer timeframes are projected and need to be shared:**
 - a) Consistent with useful lives of assets
 - b) Sufficient to see trends and impacts
 - c) Able to overlay replacement and improvement needs
- III. Current financial metrics don't link financial and asset management elements**
- IV. Progress continues to be made on financial and funding capability**

WTD Financial Trends: Debt Ratio



Status on Asset Management and Replacement Strategy

Future Policy Choices – distilled into 4 components:

1. Timing – *how quickly do we modernize ?*

- a. eBay & bandaids
 - b. 30 years
 - c. 15 years
- } Risk tolerance / Rate increase tradeoffs

2. Annual \$ Amount – *determine annual Asset R&R funding level to achieve chosen timing*

3. Protect Asset R&R Annual Funding

- a. Put “fence” around annual Asset R&R funds (financial policy in code or administrative)

4. Prioritize Asset R&R projects in Capital Program

- a. Adopt policy to prioritize Asset R&R projects based on data-informed risk and protects them from the impingement of other capital demands and drivers.

Where We Go From Here?

I. Extend the Forecast Period

- a) Longer term reporting is available; model extends to 2060
- b) Should reasonably see far enough out for program completion and debt retirement

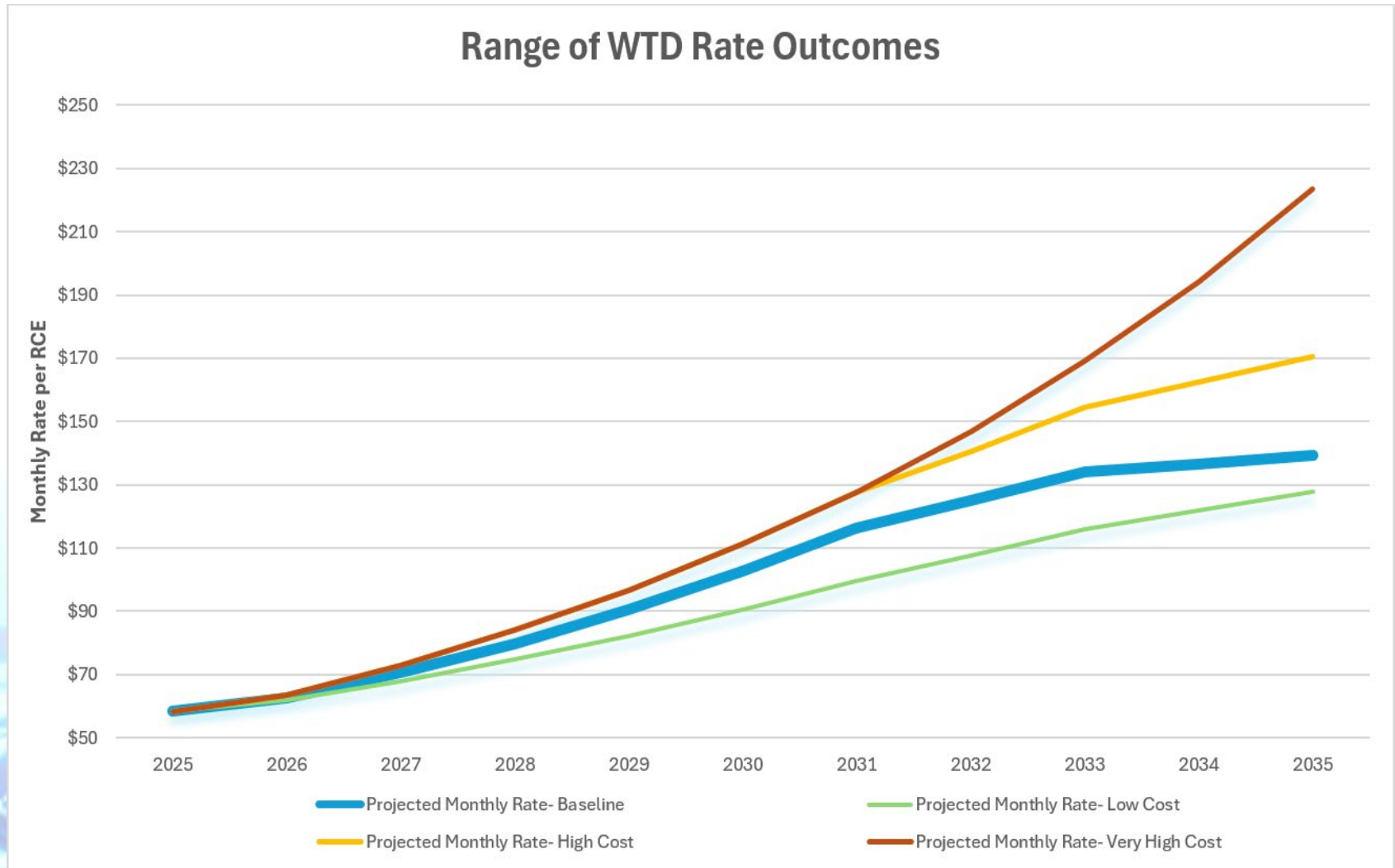
II. Incorporate Risk Scenarios and “Cone” of Outcomes

- a) Define distribution of outcomes (probabilities) or
- b) Define specific high and low scenarios
- c) Test specific cases including defined levels of re-investment

III. Define Key Sustainability Metrics

- a) Current Funding
- b) Status and Trends

Sample Risk Assessment Graphic



Introduce Focused Metrics to Evaluate System Sustainability

Numerous valuable metrics are currently in use and remain important, but they do not directly address sustainability

I. Annual Performance: Are Current Practices Adequate?

- 1. Each year, system replacement cost increases due to inflation, higher cost environment, replacements and additions. Remaining value and life decline absent adequate reinvestment.**
- 2. Annual reinvestment must match “replacement-based” depreciation to tread water.**
- 3. “Annual Reinvestment Rate” measures rate-funded capital versus system decline.**

II. System Status and Trend: Are We Sustaining the System?

- 1. Each year, the system ages and remaining useful life declines. Meanwhile, debt is also being paid off and reinvestment can add to system value.**
- 2. “Remaining Life Index” expresses what percent of system useful life remains after depreciation and debt burden are deducted.**

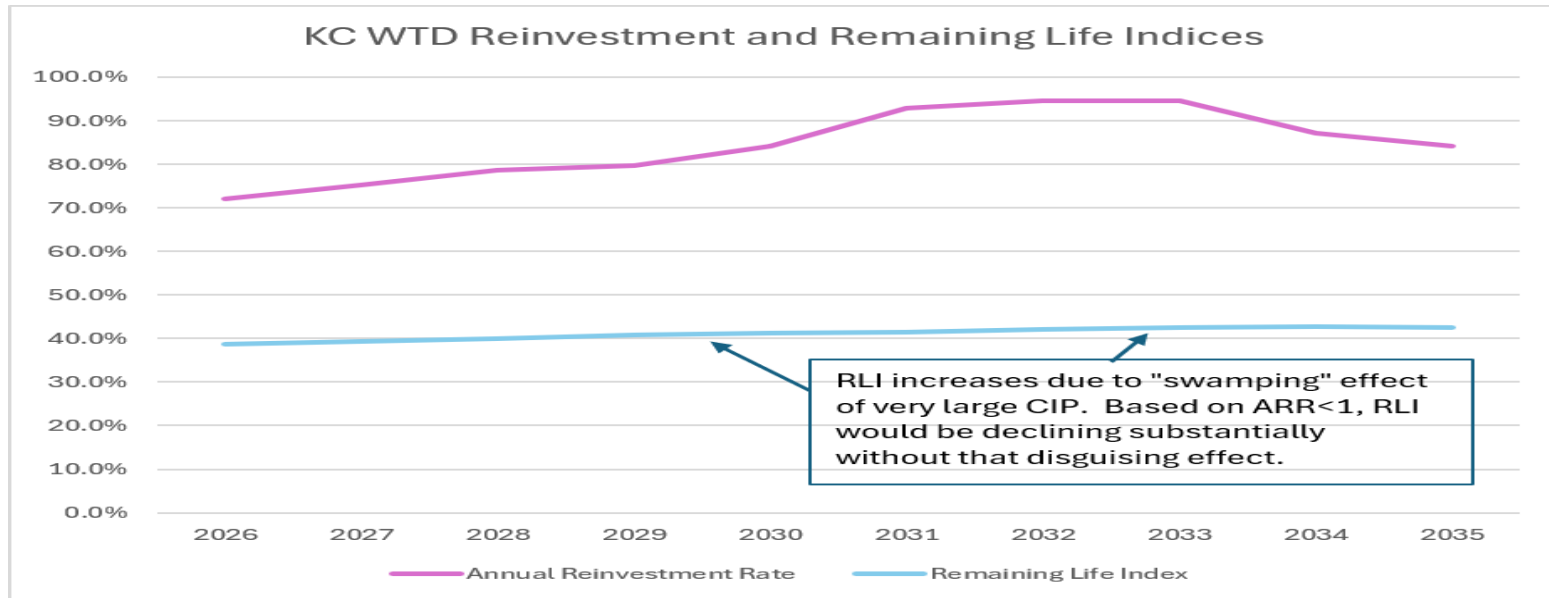
How Do These Metrics Work?

	Description	What It Means	How to Use It	Precautions
Annual Reinvestment Rate	An annual measure of reinvestment relative to accumulating replacement needs. Needs to be based on replacement cost, not original cost, and not just reproduction cost (inflated original cost).	The reinvestment rate measures the extent to which utility capacity to fund replacement is increasing or declining. It is a comparison between annual depreciation calculated on a replacement basis and the combined sum of Operating Cash Flow plus amount of debt principal being retired.	A reinvestment rate of 1.0 means that rates are funding asset depreciation through a combination of reinvestment and debt retirement. A higher rate suggests that funding exceeds the annual accumulation in replacement liability while a rate below 1.0 suggests that the replacement liability is growing.	A healthy utility can sustain its assets without compounding debt burden. A critical indicator for long-term financial viability and whether current ratepayers are adequately supporting and sustaining the system.
Remaining Life Index	A measure of overall status of system aging versus ability to fund ultimate replacement needs. A cumulative measure of funding capacity and trends that complements the Annual Reinvestment Rate	The remaining life index compares the gross replacement cost of the system to net offsetting burden. The net offsetting burden is cumulative depreciation plus outstanding debt less available cash. The resulting index suggests the relative remaining system value adjusted for utility liabilities.	The index is most useful in indicating trends in utility ability to sustain its infrastructure. It reflects both age and financial structure as factors that influence ability to support long-term reinvestment needs. A higher index indicates more ability to sustain the system, as does an increasing trend.	Since this is a cumulative metric, it does not necessarily reflect current financial practices. It does indicate the degree to which fixed asset value has been retained and enhanced (or degraded). Lower factors suggest greater urgency for improving reinvestment capabilities due to declining useful lives and ongoing liabilities from past funding practices.

Potential KC WTD Performance Metrics

	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Annual Reinvestment Rate	72.0%	75.3%	78.5%	79.8%	84.3%	92.9%	94.7%	94.5%	87.2%	84.1%
Remaining Life Index	38.7%	39.4%	40.0%	40.9%	41.2%	41.5%	42.1%	42.5%	42.7%	42.6%

Sustainability Metrics for WTD



- ARR below 100% indicates accumulating liabilities
- Increased cash funding improves both indices
- “Swamping Effect” of major capital program can disguise adverse baseline trends
 - Metrics should be run against a “steady state” system without improvements, then again with the CIP overlay
 - Otherwise, *more aggressive targets* should be used to provide adequate progress against sustainability needs
- Both metrics depend on a valid estimate of replacement cost; this needs to be assessed and updated periodically

A Real World Example: Buying and Owning a House



Cost of the House: \$1,000,000 (\$200k for land, \$800k for structure)

Useful Life: 50 years (*for this example*)

New Loan (30 year): \$1,000,000 Interest: 7% Loan Payment: \$6,653 per month

Inflation Factor: 3%

Options for Funding Replacements

1. Pay as You Go (PAYGO)

- Erratic cash flow
- No provisions for future large costs including full replacement

2. Fund Depreciation (Original Cost)

- Adds annual provision for replacement based on original cost

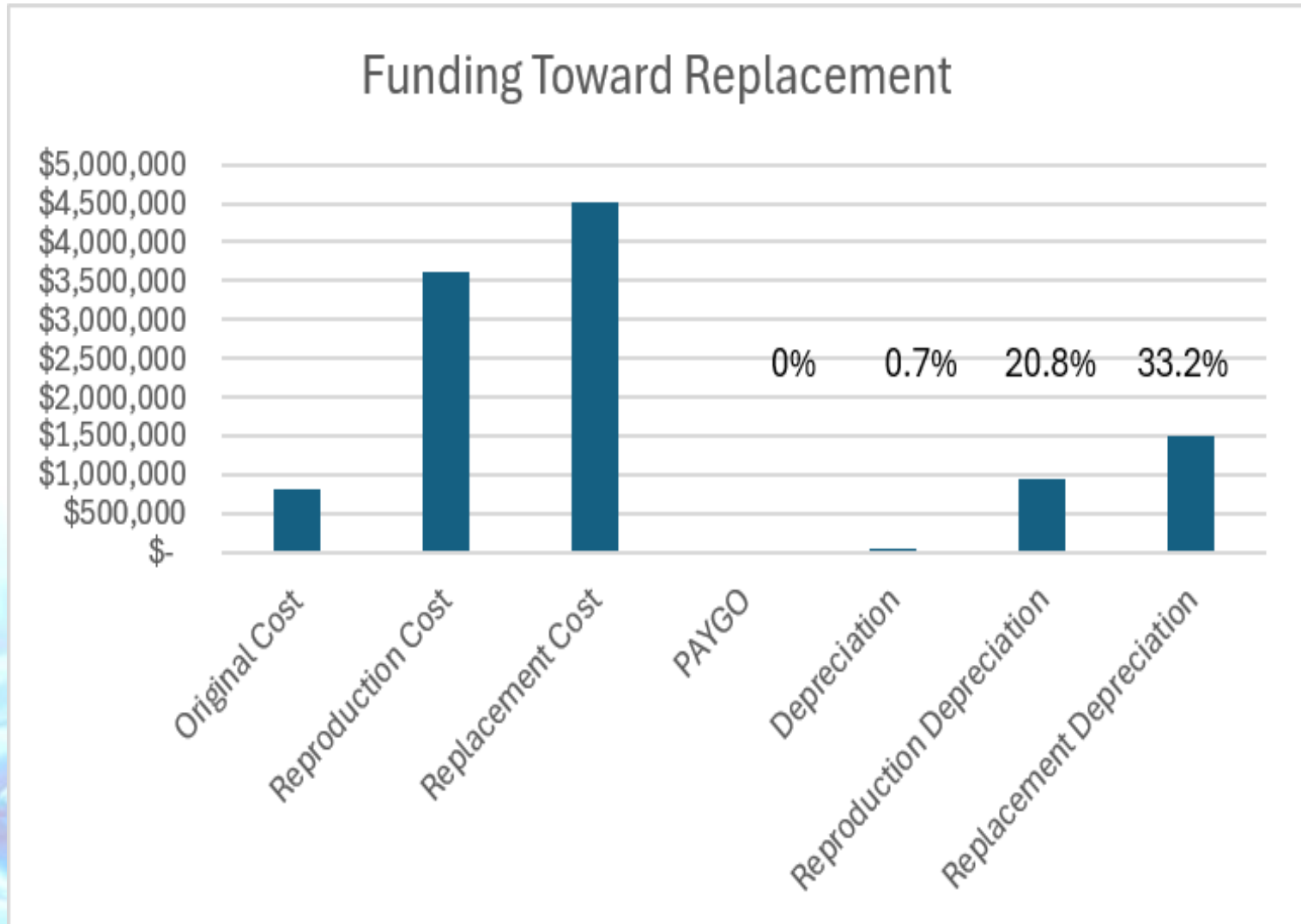
3. Fund Replacement assuming original conditions and standards

- Adds provision for replacement based on escalated original cost (*reproduction cost*)

4. Fully Fund Replacement assuming future conditions and standards

- Adds provision for replacement at new standards in new conditions (add 25% for this example)

Ability to Fund Replacement



Back to WTD

- Essential service must continue and be sustained.
- Existing infrastructure ultimately needs to be replaced.
- Numerous aging facilities suggest this is an immediate and ongoing need and obligation.
- Problem Avoidance = Exponential Problem Magnification.
- Stop Digging and Start Climbing Out.

Recommendations:

- 1) Adopt an *Annual Performance Measure* like the ARR and establish minimum performance.
 - 1) Ideally: $ARR \geq 1.0$ and a floor for minimum cash funding as % of assets (e.g. book depreciation or 1% of original cost)
- 2) Adopt a *System Status Measure* like the RLI and establish a target for system condition and net remaining life (e.g. $\geq 40\%$)
- 3) Establish financial steps to be taken to attain targets or “repair” underperforming metrics
- 4) Evaluate trends in metrics absent the overlay of new CIP, which can swamp underlying trends
- 5) System Planning and Asset Management need to coordinate with financial planning and sustainability funding strategy and need to realistically assess/estimate replacement costs.

Conclusions

- 1) System Sustainability requires Financial Sustainability.
- 2) Financial Metrics can inform Utility status and trends and through policy establish standards for financial, rate and funding decisions.
- 3) Large upcoming CIP (e.g. CSO and Nutrient Removal) risks diversion from sustaining existing assets. Financial commitment to sustaining the existing system is essential.
- 4) Increased reinvestment will help sustain utility assets and performance. Striking a balance with new needs should not undermine dedicated R&R funding.
- 5) Adopting policy defining sustainability metrics and targets would be a first step toward integrating infrastructure and financial sustainability and better informing decision-makers. Then overlay a structure to ensure adequate and appropriate investment in system replacement.

Thank you.

Regional Wastewater Services Plan (RWSP) Update:

Combined System Management

Presented to the Regional Water Quality Committee
August 5, 2026

Policy Analysis Schedule

11 “Groups” of Policy Analyses with policy options for RWQC:

March	Group #1: Separated System Conveyance
April	Group #2: Pollution Source Control & Legacy Pollution
May	Group #3: Asset Renewal & Replacement
June	Group #4: Climate Impact Preparedness & Natural Hazard Resiliency
July	Group #5: Affordability Metrics
August	Group #6: Combined System Management
September	Group #7: Treatment
October	Group #8: Resource Recovery
November	Group #9: Finance/Rate Structure
May 2027	Group #10: Equity & Social Justice
June 2027	Group #11: Relationship to Contracts

Major Policy Question - Combined System Management

How should WTD best upgrade the combined system to address regulatory requirements, regional water quality, and West Point operations?

How should combined system costs be recovered?

RWSP's Combined System Policy Effort Relative to the CSO Consent Decree

RWSP Update needs to meet or exceed regulatory and legal requirements.

The RWSP must be submitted to Department of Ecology for approval as the County's General Sewer Plan Update.

Capital Work Program is exploring options to balance regulatory requirements with options to address financial sustainability and affordability.

Problem Statement

- Combined sewer/stormwater systems face multiple capacity and peak flow management challenges.
- CSO control costs are increasing and comprise a significant portion of WTD's capital program over next few years.
- King County is subject to a consent decree with EPA, Department of Ecology, and the Department of Justice to complete defined CSO control projects by the end of 2037.

Why is CSO Control important?



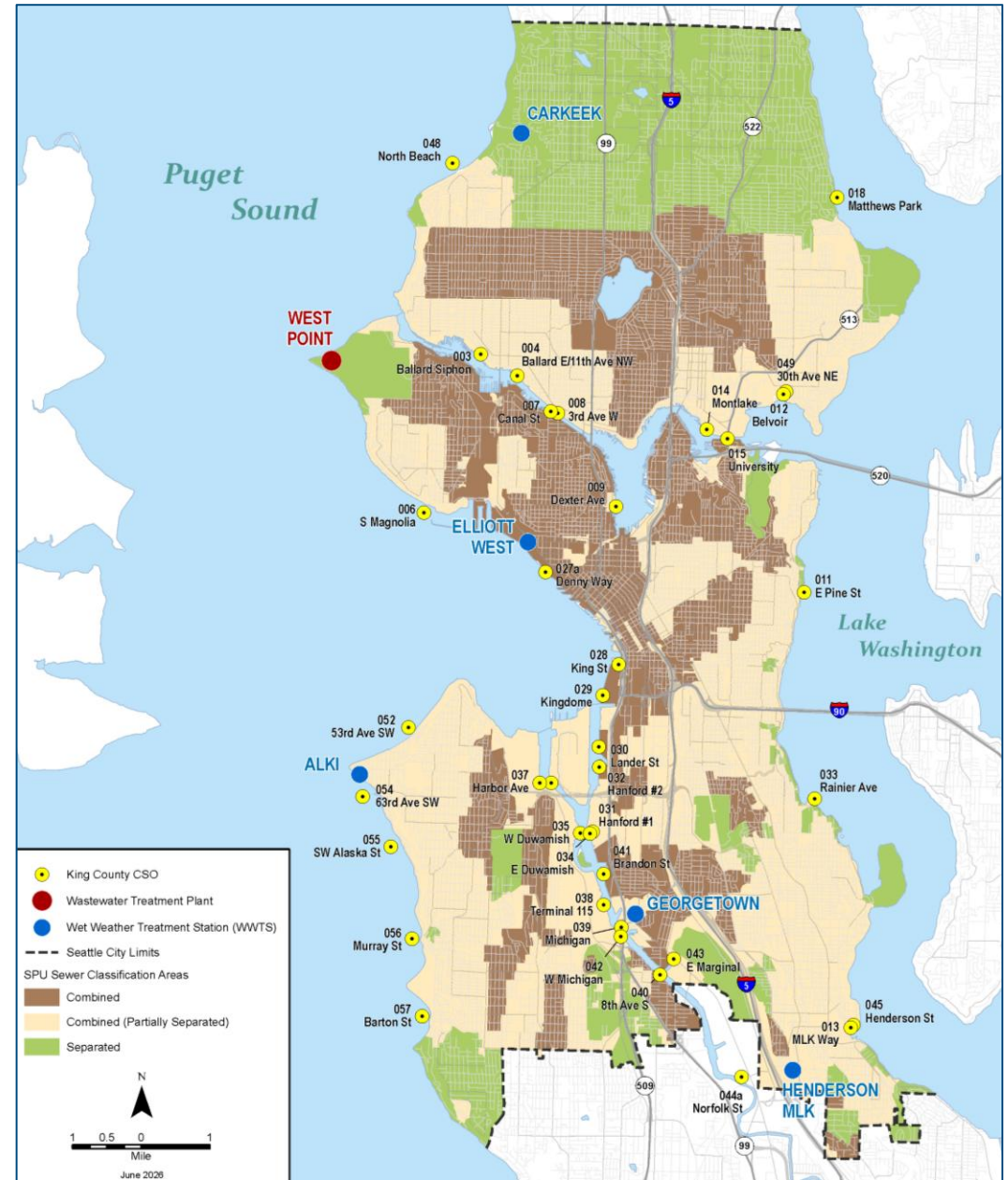
- CSOs are a recognized source of water pollution and public health concern, regulated under the Federal Clean Water Act and Washington State administrative code.
- Outfalls must be controlled so that no more than one untreated discharge occurs per year on average. (WAC 173-245-20)
- West Point's NPDES Permit, renewed in 2024, updated the CSO control program to include corrective actions for CSOs that have trended above the one discharge per year average.
- Consent Decree signed in 2013 by EPA, Washington State, and King County to bring all CSOs under control by 2030. Consent Decree modified in 2025 to extend the deadline to 2037.

Combined vs Separated flows in Seattle

Seattle's wastewater conveyance system shows legacy of combining and separating storm and sanitary flows:

- 29% is fully **combined**
- About 44% of Seattle is **partially separated/combined**, with right-of-way storm flows conveyed to the drainage system and parcel-based flows conveyed to the combined sewer system
- About 26% is fully **separated** into storm/drainage and sanitary flows*

*In some cases, separated storm flows reconnect to the downstream combined system



King County and Seattle each manage their own CSO systems

King County has 38 CSO outfalls.

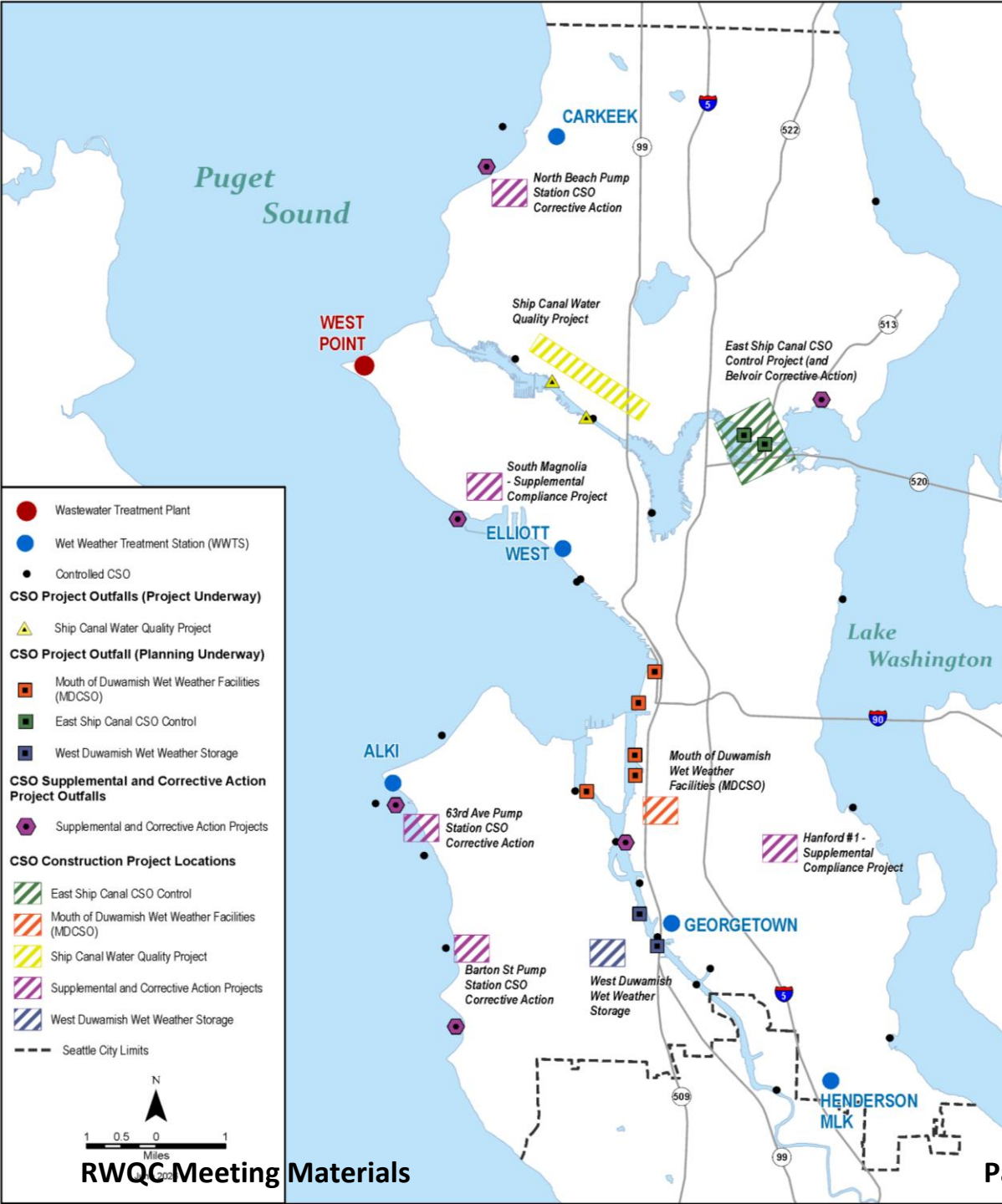
Seattle has 82 CSO outfalls.

King County and Seattle are obligated to control their CSOs to meet the state standard of one untreated discharge per year on average.



Existing King County CSO Policy Summary

- **Control of CSOs by 2030** (CSOCP-1) **consistent with schedule in CD** and approved long-term control plan (CSOCP-12)
- Adherence to state and federal **regulations and agreements** (CSOCP-2)
- **Prioritization** of CSO control activities for human health and environmental benefits (CSOCP-3)
- **Coordination with Seattle** as appropriate when separating stormwater from the combined system (CSOCP-4) and to consider joint CSO control projects when cost effective (CSOCP-8)
- Preclusion of design for new or contaminated **stormwater** sources unless certain considerations are addressed (CSOCP-5 and 6)
- Consideration of **green stormwater infrastructure** projects (CSOCP-7)
- Implementation of **sediment management** strategies (CSOCP-9)
- Implementation and regular amendments of the **Long-term CSO Control Plan** with most current studies and information and appropriate Council and regulatory approvals. (CSOCP-10 and 11)
- **Water Quality Assessment and Monitoring Study** by 2018 (CSOCP-13)



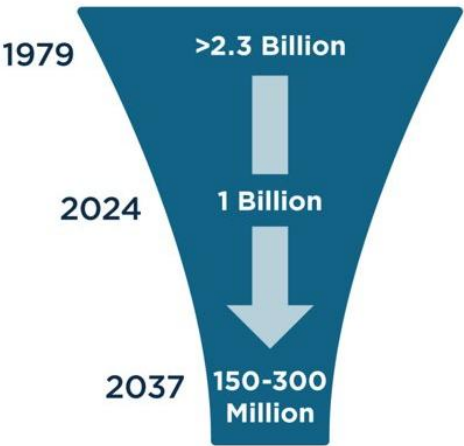
Combined Sewer Projects

- Over \$1B invested since the early 1990s

Outfall Status May 2026	Number of Outfalls
Controlled	21
Uncontrolled, project underway	9
Uncontrolled, under supplemental compliance	3
Uncontrolled, previously controlled	3
Uncontrolled, future project in planning	2

King County CSO Reduction over Time

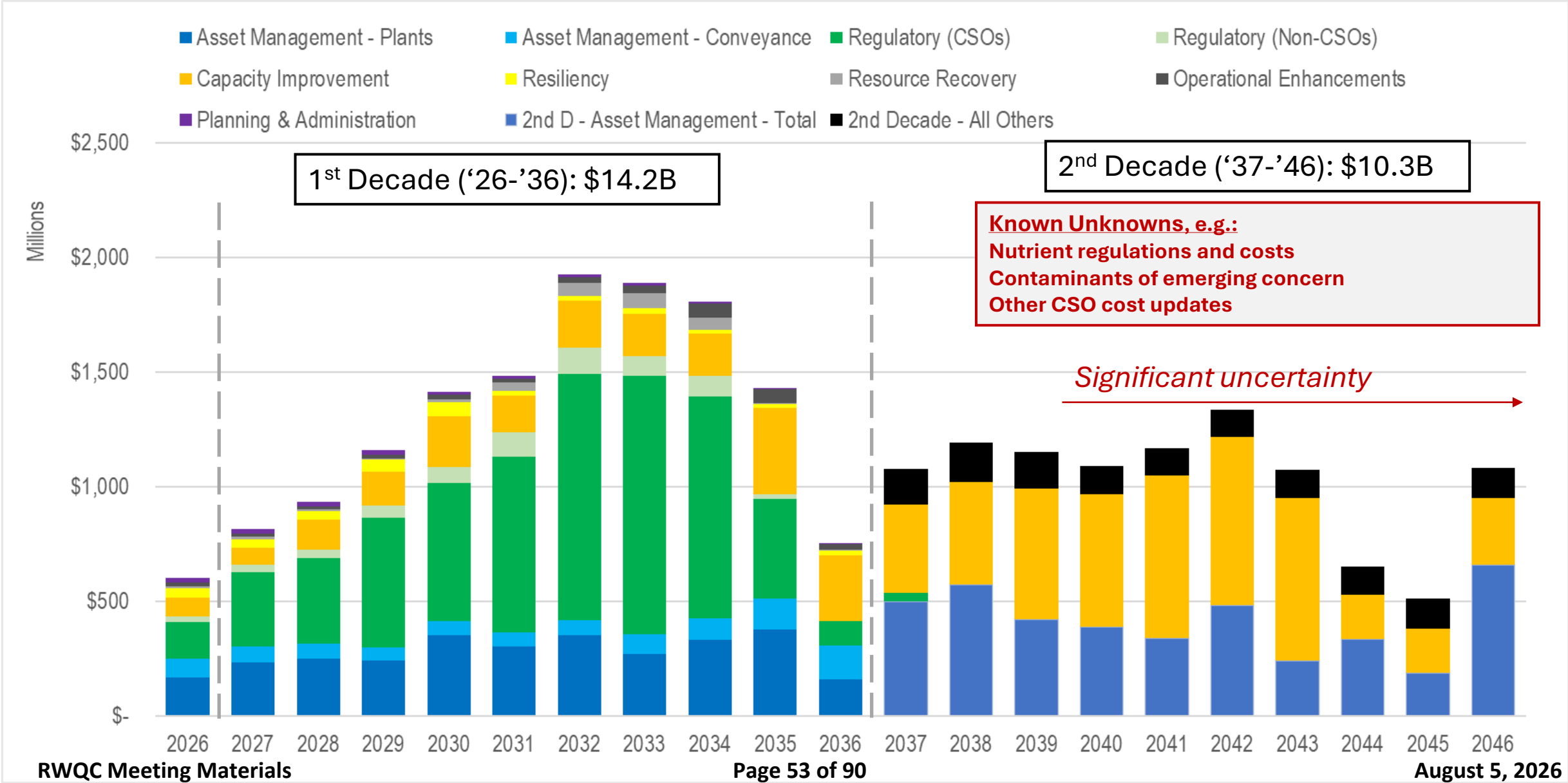
Significant reduction in the average annual gallons of untreated stormwater and wastewater overflows



Current and Budgeted Expenditures – Combined System

- Projected CSO expenditures included in the Regulatory Portfolio category total \$6.5 billion for the period 2026 through 2046.
- Adopted 2027 Sewer Rate and accompanying financial forecast assume completion of the CSO projects in 2037, as required in the modified Consent Decree.

20-Year Rate Capital Forecast by Portfolio Category



Combined System: relationship to other RWSP topics

- 1. Separated system** – Portions of the separated system flow into the combined system and to the West Point Treatment Plant. Addressing infiltration/inflow (I/I) in the separated system may support CSO control in the combined system by reducing wet weather flows upstream, depending on volumes and location.
- 2. Pollution (Source Control and Legacy)** – Source control activities are required in the combined sewer system through the West Point National Pollutant Discharge Elimination System (NPDES) permit.
- 3. Climate adaptation** – CSO projects use climate-informed design standards. This continually improves the system's capability to handle intense storms and sea-level rise, adapting the system as time progresses.

Combined System: relationship to other RWSP topics

- 4. Treatment planning** – Effective treatment planning must account for strategies that minimize overflows during wet weather events, as well as potential options to “redirect flows” away from the West Point Treatment plant. Wet weather treatment stations provide primary treatment when flows cannot reach full secondary treatment at West Point.
- 5. Finance and rate setting** – CSO costs are a large capital cost driver. The November 2026 policy memo will evaluate various rate structure options that explore “who pays” for these costs.
- 6. Asset Renewal & Replacement** – The combined system contains many old assets, as such the Asset Renewal and Replacement topic of the RWSP has a strong nexus with the Combined System policy question.

Policy Option Context

- All policy options for the Combined System Management will meet existing regulatory and legal requirements for CSO control under the CSO Consent Decree and NPDES permit.
- All policy options presume existing jurisdictional authority.
- The Executive's Sewer Rate and Capital Work Program is exploring options to balance regulatory requirements with options to address financial sustainability and affordability.

Range of Policy Options – Combined System

Policy Question: *How should WTD best upgrade the combined system to address regulatory requirements, regional water quality, and West Point operations?*

Policy Option #1

Complete all Consent Decree (CD) and permit requirements on schedule, using Green Stormwater Infrastructure (GSI) when cost effective.

Policy Option #2

Meet CD and permit requirements AND proactively invest in peak flow management to reduce inflow and redirect some combined flows from West Point to other treatment plant(s).

Policy Option #3

Meet CD and permit requirements AND go beyond to achieve zero CSO discharges through extensive peak flow management including separation, storage, and GSI

Policy Option #1 – Combined System Management

	Description	Goal/Outcomes	Tradeoffs
#1	Complete all consent decree (CD) and permit requirements on schedule, using GSI when cost effective.	Meet CSO control legal obligations to achieve water quality benefits - i.e., no more than one CSO event per outfall per year on a 20-year rolling average.	Stacking of capital investments difficult to deliver on regulatory schedule but meets legal obligations and improves water quality. Costs: consistent with projected CSO expenditures 2026 – 2046 (\$6.5 billion).

Policy Option #2 – Combined System Management

	Description	Goal/Outcomes	Tradeoffs
#2	Meet CD and permit requirements AND proactively invest in peak flow management to reduce inflow and redirect some combined flows from West Point to other treatment plant(s).	Improved water quality AND capacity to meet future regulations at West Point – i.e., Option #1 outcomes AND further reduce CSOs AND reduced burden of peak flows to add capacity for future West Point upgrades	Uncertainty around how much programmatic peak flow management would be needed to directly offset future CSO control requirements as system flows and climate impacts could push additional outfalls out of control. Ability to potentially address future regulations at West Point. Qualitative Costs: higher than Option #1 projected CSO expenditures.

Policy Option #3 – Combined System Management

	Description	Goal/Outcomes	Tradeoffs
#3	Meet CD and permit requirements AND go beyond to achieve zero CSO discharges through extensive peak flow management including separation, storage, and GSI	Option #1 outcomes and even more water quality improvement and reduced compliance risk through elimination of untreated discharges of combined sewer/stormwater flows from King County CSO outfalls.	Exceeds regulatory requirements by managing even the largest storms (at high cost), improves water quality by eliminating untreated discharges of combined sewer/stormwater flows. Long term compliance risk is reduced Qualitative Costs: substantially higher costs to disconnect storm flows and add infrastructure to store and treat all peak wet weather flows, including largest storms

Policy Options – Combined System Management (Financial / Rate Structure Policies)

Policy Question:

How should combined system costs be recovered?

Policy Options – Combined System Management (Financial / Rate Structure Policies)

Policy Question: How should combined system costs be recovered?

- Currently combined system costs are shared by all local sewer agencies through the uniform sewer rate.
- In November 2026 WTD will identify various alternative rate structure options, including a CSO surcharge for the combined system and an infiltration/inflow (I/I) surcharge.
- A volume-based rate could also have an impact on the apportionment of the combined system's financial impact.

Policy Options – Combined System Management

(Financial / Rate Structure Policies)

Policy Question: *How should combined system costs be recovered?*

Alternative Rate Structure Options to be analyzed for November RWQC

Rate Structure	Who Pays More?
Uniform Rate	Everyone pays the same rate (status quo)
CSO Surcharge	Combined system customers (Seattle)
Volume/Flow – Based Rate	Higher flow jurisdictions (more analysis needed)
I/I Surcharge	High I&I jurisdictions (Renton, Tukwila, etc.)

Brief History of WTD's Uniform Sewer Rate (1 of 2)

History before Robinswood – Seattle to “Metro” (1880 – 1961 – 1999)

- First pipes in the Seattle area installed in the 1880's before the creation of “Metro” (now King County WTD), and many are still in service
- When Metro was formed in 1961, a regional approach was taken where the combined system in Seattle was part of the design.
- At that time, negotiations created the “**Basic Sewage Disposal Agreement**” which was signed between Metro and component agencies. Key components:
 - Seattle to subsidize expansion of sewer system into the suburban cities
 - Metro took ownership of sewer serving larger than 1,000 acres, including some Combined Sewer Overflow outfalls
 - Uniform rates per Residential Customer Equivalent (initially 900 cubic feet (cf)/month for non-single-family flows) to be paid by all component agencies

Brief History of WTD's Uniform Sewer Rate (2 of 2)

- **Robinswood Agreement (1999 RWSP to Present Day)**

- “All for one, and one for all”
 - All in the region contribute equally to the costs of I&I impacts
 - All in the region contribute equally to the costs of reducing CSOs
 - All growth in the region contributes equally to costs of building 3rd Treatment Plant (Brightwater)

- **Capacity Charge**

- “Growth Pays for Growth”
 - Applies uniformly throughout the service area
 - Recovers cost to the system to serve growth
 - Charge on new / upgrade connections to the system, paid over 15 years

- **Residential Customer Equivalent (RCE)**

- Each single-family home is defined as one RCE
- One RCE = 750 cubic feet (based on an analysis of residential water consumption in 1982). Actual monthly flow from single-family homes today is lower.
- Non-single-family residences are billed based on flow, and converted to RCEs based on 750 cubic feet per month of water consumption

Questions:

1. Questions on policy options?
2. Are there additional or modified policy options we should consider?





Wastewater Treatment Division

Executive summary

RWSP Update – Group #6, Policy Memo #9: Combined System Management

This executive summary provides a synopsis of the policy questions, problem statement, issues, challenges, and the options developed for the Combined System Management topic of the Regional Wastewater Services Plan (RWSP) Update.

Policy questions

1. How should WTD best upgrade the combined system to address regulatory requirements, regional water quality, and West Point operations?
2. How should combined system costs be recovered?¹

Problem statement

Combined Sewer Overflows (CSOs) are relief points designed into combined sewers that discharge excess stormwater and wastewater into water bodies when the system is at capacity. During periods of intense rainfall, when treatment plants and sewers in the combined system can become overwhelmed, CSO discharges prevent backups into homes, businesses, and WTD infrastructure. The majority of King County Wastewater Treatment Division's (WTD) service area has separate pipes. However, about 75% of Seattle is served by a combined sewer system.

Combined sewer and stormwater systems face multiple capacity and peak flow management challenges; uncertain volumes can rise suddenly during storm events, overwhelming the system's capacity until all stored flows can reach treatment.

King County WTD is subject to a consent decree with EPA, Ecology, and the Department of Justice to complete defined CSO control projects by the end of 2037. CSO control costs are increasing and comprise a significant portion of WTD's capital program over the next two decades – i.e. \$6.5 billion between 2026 and 2046.

Policy issues, challenges, and opportunities

Proactive investments in peak flow management in the combined system (e.g. separation, I/I reduction, green stormwater infrastructure (GSI)) can offer relief to the West Point treatment plant and complement CSO control projects for longer term compliance.

¹ For the purposes of this policy memo, WTD adjusted the wording of this question.

Extensive separation of the combined system has thus far not shown to be cost effective relative to construction of wet weather storage and/or treatment facilities. Also, current policy and legal constraints associated with sewer rate payer funds for GSI may limit the extent to which this approach can be used.

Regarding rate structures that can affect the apportionment of the combined system's financial impact, WTD has had a uniform sewer rate for over six decades, beginning in 1961 when the first sewer contracts were signed between King County Metro and its local agencies. Under this uniform sewer rate structure, rate payers from each of the 34 Local Sewer Agencies (LSAs) contribute equally to the costs of controlling CSOs regardless of their geography.² Current contracts with all 34 LSAs maintain the uniform sewer rate.

The process to update the RWSP will evaluate alternatives to WTD's uniform sewer rate to address combined system costs. In doing so, it is important to understand and emphasize the history and common interests behind today's regional system and its uniform rate.

More than 65 years ago, when Metro was formed in 1958, a regional wastewater system was established to protect water quality across jurisdictional boundaries. Under this regional approach, the combined system in Seattle was designed into the structure of the regional wastewater system. At that time, the "Basic Sewage Disposal Agreement" was signed between Metro and component agencies. Under this Agreement, Seattle subsidized the expansion of the sewer system into the suburban cities, and Metro took ownership of sewers serving areas larger than 1,000 acres, including many CSO outfalls. In addition, the Agreement put in place the uniform rate per Residential Customer Equivalent (RCE) paid by all component agencies. Forward Thrust bonds, approved by King County voters in 1968 and 1970, helped pay for the separation of sewers in portions of Seattle to reduce CSOs.

Since then, the regional system has grown over time and geography and has evolved into a present-day partnership with 34 contract agencies. When considering geography and levels of investment into the regional system (including past and future CSO costs), it is important to look across the entire time horizon – i.e., since 1961 when the first sewer contract was signed.

Rate payer funds are spent and prioritized based on the system's needs (e.g., like an old house, some years WTD invests in the roof, other years WTD invests in the basement plumbing). In the short-term, certain portions of WTD's service area may see different levels of investment. Over long term, the entire system is invested in to ensure all 34

² To be more specific than "equal" contribution, each LSA contributes proportionally by RCE.

agencies receive the level of service WTD delivers to protect water quality across the region.

Policy options

Policy question #1: How should WTD best upgrade the combined system to address regulatory requirements, regional water quality, and West Point operations?

- a. Policy option #1: Complete all consent decree (CD) and permit requirements on schedule, using Green Stormwater Infrastructure (GSI) when cost effective.

Outcome: Meet CSO control legal obligations to achieve water quality benefits - i.e., no more than one CSO event per outfall per year on a 20-year rolling average.

- b. Policy option #2: Meet CD and permit requirements and proactively invest in peak flow management to reduce inflow in the combined system to further reduce untreated CSO discharges and reduce strain on West Point Treatment Plant (i.e., redirect some flows from West Point to another treatment plant).

Outcome: Option #1 outcomes and further water quality improvement, as well as reduced burden of peak wet weather flows on combined system and the West Point treatment plant to add capacity for CSO reduction and support compliance, operation, and treatment planning for future West Point upgrades.

- c. Policy option #3: Meet CD and permit requirements and go beyond to eliminate untreated CSO discharges through extensive peak flow management, including separation, storage, and GSI.

Outcome: Option #1 outcomes and even more water quality improvement and reduced compliance risk through elimination of untreated discharges of combined sewer/stormwater flows from King County CSO outfalls.

Policy question #2: How should combined system costs be recovered?

WTD uses a uniform sewer rate to cover the capital and operational costs of the entire regional sewer system which includes all combined system costs. Under this structure each of the 34 LSAs contribute equally to the costs of controlling CSOs. An alternative would be a CSO surcharge applied to customers within WTD's combined system geography. Since the combined system is entirely within Seattle, this would result in

Seattle residents paying more for their wastewater services. Another alternative structure is a volume-based rate which could have an impact on the apportionment of the combined system's financial impact.

In November 2026 WTD will provide RWQC with a Rate Structure Policy Memo that will identify various alternative options to WTD's current uniform sewer rate. This analysis will include an I/I surcharge for the separated system, a CSO surcharge for the combined system, and a volume-based rate across the entire system amongst other alternatives.

Relationship with other RWSP topics

Combined System Management intersects with many RWSP topics as described below.

Separated System Conveyance: Portions of the separated system flow into the combined system and to the West Point Treatment Plant. Addressing infiltration/inflow (I/I) in the separated system may support CSO control in the combined system by reducing wet weather flows upstream, depending on volumes and location, as would addressing infiltration into the combined system.

Pollution: Source control activities are required in the combined sewer system through the West Point National Pollutant Discharge Elimination System (NPDES) permit.

Asset Renewal and Replacement: The combined system contains many old assets, as such the Asset Renewal and Replacement topic of the RWSP has a strong nexus relating to upgrades to the combined system.

Climate Impact Preparedness and Natural Hazard Resiliency: Combined system management has a nexus with the Climate Preparedness topic of the RWSP. CSO projects use climate informed design standards. This continually improves the system's capability to handle intense storms and sea-level rise, adapting the system as time progresses.

Treatment planning: CSO and treatment planning are connected since effective treatment planning must account for strategies that minimize overflows during wet weather events, as well as potential options to "redirect flows" away from the West Point treatment plant. Wet weather treatment stations provide primary treatment when flows cannot reach full secondary treatment at West Point.

Finance and Rate Setting: How combined system costs are addressed has a direct relationship to WTD's rate structure. The planning process to update the RWSP will include evaluation of a variety of alternative rate structures that could impact how combined system costs are recovered.

RWSP Update – Combined System Management

Policy Memo #9

A. Policy questions

This memo is focused on the following policy questions related to the Combined System Management topic of the Regional Wastewater Services Plan (RWSP) Update:

- i. How should WTD best upgrade the combined system to address regulatory requirements, regional water quality, and West Point operations?
- ii. How should combined system costs be recovered?

B. Problem statement

Combined Sewer Overflows (CSOs) are relief points designed into combined sewers that discharge excess stormwater and wastewater into water bodies when the system is at capacity. The majority of King County WTD's service area has separate pipes. However, about 75% of Seattle is served by a combined sewer system.

King County WTD's responsibility inside Seattle begins where the City's pipes have collected sewage from areas greater than 1,000 acres and convey the sewage to WTD's system. WTD conveys most of the flow from Seattle (including most of the combined sewage flows) to the West Point Treatment Plant.

During periods of intense rainfall, when treatment plants and sewers in the combined system can become overwhelmed, CSO discharges prevent backups into homes and WTD infrastructure. Overflows may occur at any of the 38 County CSO locations that discharge to Lake Washington, Lake Union, the Lake Washington Ship Canal (Ship Canal), the Duwamish River, Elliott Bay, and Puget Sound.

King County is under a federal Consent Decree with the EPA and WA State to control all 38 CSO locations to an average of one event per year by 2037.

C. Contextual and baseline information

i. What is known about the topic and current conditions

Combined sewer overflows are constructed relief points that protect upstream communities and downstream infrastructure. When untreated discharges take place during wet weather events, the discharged volume reflects peak wet weather flows, estimated to be 90% stormwater flows and 10% sewage. These untreated discharges are a recognized source of water pollution and public health concern.

CSOs can be reduced or prevented by optimizing system controls, separating wastewater and stormwater flows, adding Green Stormwater Infrastructure (GSI), building more treatment capacity, adding storage capacity so more combined flow can be treated later (after a storm subsides), or constructing wet weather treatment facilities.

King County and the City of Seattle each manage their own CSO control program and each agency is subject to NPDES permit and consent decree requirements for CSO control and combined system management under the Clean Water Act. King County has 38 CSO outfalls that it manages while Seattle has 82 CSO outfalls it manages, as shown in Figure 1 below. The Washington State standard for CSO control requires that each outfall discharge no more than once per year on a 20-year moving average.



Figure 1. King County and City of Seattle CSO outfalls

King County has made significant progress over time in controlling CSOs, reducing the annual untreated overflow volume from over 2.3 billion gallons per year in 1979 to an average annual discharge of one billion gallons in 2025. King County has controlled 21 of

38 CSOs to the standard of one event per year at each location, primarily through construction of additional storage and wet weather treatment facilities and has plans to control the remaining uncontrolled CSOs by 2037. Figure 2 below shows the status (controlled or uncontrolled) of King County's 38 CSO outfalls.



Figure 2. King County CSO Control Status Map as of the CSO Annual Report 2025

ii. Current policies in code, contract, or in-practice

King County Code (KCC)
KCC 28.86.080 - Combined sewer overflow control policies (CSOCP)

Washington Administrative Code (WAC)
Chapter 173-245 WAC – Submission of Plans and Reports for Construction and Operation of Combined Sewer Overflow Reduction Facilities

National Pollutant Discharge Elimination System (“NPDES”) for West Point and Combined Sewer Overflow System
The West Point NPDES regulates CSO discharges because the combined system is treated at West Point Treatment Plant (West Point). The West Point NPDES also regulates standards for wet weather treatment station performance, pollution prevention activities, and water quality standards for receiving waters.

Consent Decree
Settlement agreement made between the US EPA, the State of Washington, and King County for violating “Sections 301 and 402 of the Clean Water Act, 33 U.S.C. §§ 1311 and 1342, and the conditions and limitations of its National Pollutant Discharge Elimination System (“NPDES”) permit issued to the County by Ecology, as authorized by EPA under Section 402(b) of the CWA, 33 U.S.C. § 1342(b).”
The Consent Decree was modified in 2025; the Modified Consent Decree increases the size of CSO control projects and extends the CSO control deadline from 2030 to 2037.

iii. The system “must-dos”

King County is legally obligated through the CSO Consent Decree (CD) to control all 38 CSOs to the State standard of one (1) or less overflow per year on a 20-year rolling average. The 2025 modified CSO CD includes a list of projects and delivery milestones to be completed by the end of 2037.

King County must comply with the West Point NPDES Permit that regulates treated effluent and the receiving water quality standards affected by the combined system.

iv. Current and budgeted expenditure

Upcoming CSO investments will build on extensive investment to date. Since the early 1990s, WTD has invested over \$1 billion in CSO control infrastructure. Since the creation of

Metro, the region has made other extensive investments to upgrade the regional system's treatment plants and conduct extensive sewer separation projects to support CSO control.

Projected CSO expenditures included in the Regulatory Portfolio category total \$6.5 billion for the period 2026 through 2046. The adopted 2027 Sewer Rate and accompanying financial forecast assume completion of the CSO CD projects in 2037, as required in the modified Consent Decree. The 2026-2046 financial forecast that informs the adopted 2027 Sewer Rate plan includes 100% of the total CSO costs (\$6.5 billion). Figure 3 below shows the 2026-2046 financial forecast updated in 2026. Figure 4 then shows the map of all current King County CSO Control Projects.

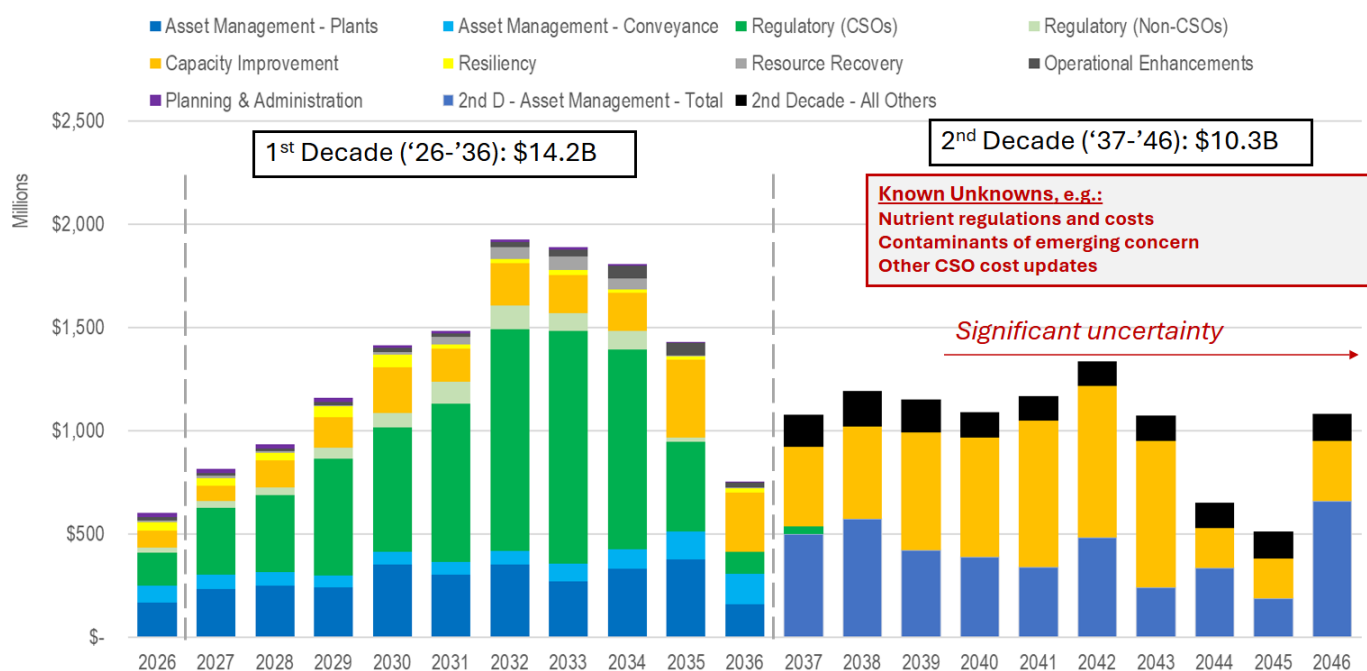


Figure 3. 20-Year Rate Capital Forecast by Portfolio Category

v. Summary of science/data

King County has invested in CSO control improvements for decades. Since the early 1990s, CSO project costs have exceeded one billion dollars. Untreated discharge volumes have been reduced from the 1983 baseline of 2.3 billion gallons per year to the current annual average of about 1 billion gallons of discharge over the past decade. Figure 4 below shows an illustration of the total reduction in discharged combined sewer overflows.

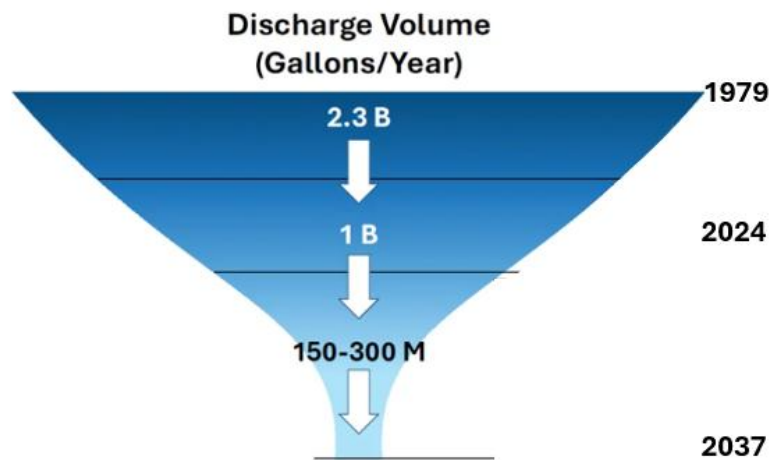


Figure 4. King County CSO Discharge Volume Over Time

CSO control status as of the 2025 CSO Annual Report is described below.

In Control – 21

The following 21 CSO outfalls, with the corresponding discharge serial number (DSN), were identified as controlled through monitoring and modeling data:

1. 53rd Avenue Southwest Pump Station Overflow, 052 (53rd Ave. SW PS)
2. 8th Avenue South Overflow, 040 (8th Ave. S)
3. Ballard Siphon Overflow, 003
4. Canal Street Overflow, 007 (Canal St.)
5. Dexter Ave. Regulator Station Overflow, 009 (Dexter Ave. RS)
6. East Duwamish Pump Station Overflow, 034 (E Duwamish PS)
7. East Marginal Way Pump Station Overflow, 043 (E Marginal Way PS)
8. East Pine Street Pump Station Overflow, 011 (E Pine St. PS)
9. Harbor Avenue Regulator Station Overflow, 037 (Harbor Ave. RS)
10. Henderson Street Pump Station Overflow, 045 (Henderson St. PS)

11. Martin Luther King Junior Way Overflow, 013 (MLK Jr. Way)
12. Matthews Park Pump Station Overflow, 018 (Matthews Park PS)
13. Murray Avenue Pump Station Overflow, 056 (Murray PS)
14. Norfolk Street Overflow, 044a (Norfolk St.)
15. Rainier Avenue Pump Station Overflow, 033 (Rainier Ave. PS)
16. Southwest Alaska Street Overflow, 055 (SW Alaska St.)
17. West Duwamish Overflow, 035 (W Duwamish)
18. Denny Way Regulator Station Overflow, 027a (Denny Way RS)
19. Brandon Street Regulator Station Overflow, 041 (Brandon St. RS)
20. South Michigan Street Regulator Station Overflow, 039 (S Michigan St. RS)
21. 30th Ave. Northeast, 049 (30th Ave. NE)

Uncontrolled – 17

The following 17 CSO outfalls are not currently meeting the WA State standard of no more than one overflow per year on a 20-year rolling average:

Projects Underway

Ship Canal Water Quality Project

1. 3rd Avenue West Overflow, 008 (3rd Ave. W)
2. 11th Avenue Northwest Overflow, 004

West Duwamish Wet Weather Storage

3. West Michigan Street Overflow, 042 (W Michigan St.)
4. Terminal 115 Overflow, 038

Mouth of Duwamish Wet Weather Facilities (MDCSO)

5. Chelan Avenue Regulation Station Overflow, 036 (Chelan Ave.)
6. Hanford #2 Regulator Station Overflow, 032
7. Lander Street Regulator Station Overflow, 030
8. Kingdome Regulator Station Overflow, 029 (Kingdome RS)
9. King Street Regulator Station Overflow, 028 (King St. RS)

Planning Underway:

East Ship Canal CSO Control

10. University Regulator Station Overflow, 015
11. Montlake Regulator Station Overflow, 014

Supplemental Compliance Projects

CSOs in Supplemental Compliance had previous control projects completed that did not meet the standard of no more than one overflow per year and require additional work to meet the standard:

12. Barton Street Pump Station Overflow, 057 (Barton St. PS)
13. South Magnolia Overflow, 006 (S Magnolia)
14. Hanford #1 Overflow, 031 (Hanford #1)

Corrective Action Projects

CSOs in Corrective Action were not identified in the Consent Decree as needing CSO control projects but have more recently trended out of CSO control of no more than one overflow per year. Corrective Action requirements are detailed in the West Point NPDES permit:

15. 63rd Avenue Southwest Overflow, 054 (63rd Ave. SW)
16. Belvoir Pump Station Overflow, 012 (Belvoir PS)
17. North Beach Pump Station Wet Well, 048a (North Beach PS)

CSO Annual Report: To see more information about the details and status of each project, please review the most recent CSO Annual Report: [CSO Annual Report Library](#).

Figure 5 below illustrates the geographic distribution of King County's CSO control projects.

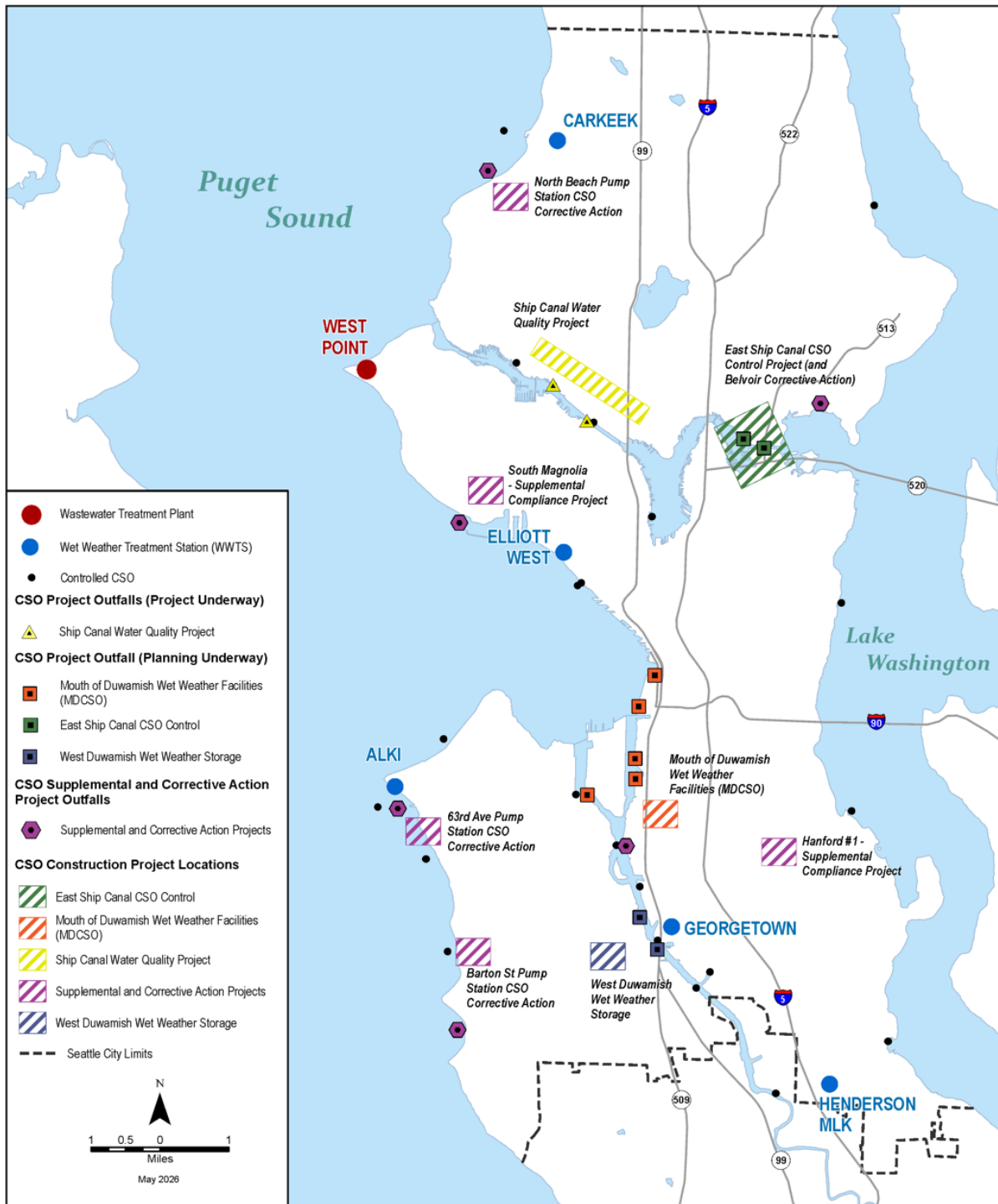


Figure 5. King County Current CSO projects

D. Example practices from other jurisdictions/industry

Combined sewer systems exist in many parts of older cities across the nation, dating back to when standard practice was to convey stormwater and wastewater in combined sewer systems. Most sewer systems built after the 1950's convey sewage and stormwater in separate pipes. Peer jurisdictions with combined systems must meet applicable state and federal requirements under the Clean Water Act for CSO control.

EPA has established dozens of CSO consent decrees across the country. At present, many of these are still in effect as jurisdictions make progress in CSO control programs and variably face the need to renegotiate the timelines and terms of program compliance. CSO control standards can vary depending on local and state requirements, including volume vs. event standards. All CSO jurisdictions are subject to minimum control activities. The City of Seattle manages its own CSO control program and is subject to its own CSO consent decree. WTD coordinates closely with Seattle Public Utilities on combined system management and CSO control planning.

E. Policy issues, challenges, and opportunities related to policy questions

Combined system management upgrades face unique challenges, such as navigation of prescriptive legal requirements and schedules, complex project design and delivery in a dense urban environment, anticipation of peak flow patterns and flow characterization in a changing climate, and high cost. There are various tradeoffs between meeting discharge frequency and water quality standards and investment in other system needs and opportunities.

The policy options described below present opportunities to upgrade the combined sewer system for additional system performance, public health, and environmental benefits while meeting regulatory requirements for CSO control. Removal of storm flows and I/I from the regional system may offer relief and opportunities in the West Point system. Reduction or elimination of discharges would offer further water quality benefits for human and ecological health. Co-benefits of managing flows using green stormwater infrastructure may enhance local health and environmental indicators for communities.

F. Range of Policy Options

The policy options describe potential choices and Combined System Actions that could be implemented to address the following policy questions:

- i. How should WTD best upgrade the combined system to address regulatory requirements, regional water quality, and West Point operations?
- ii. How should combined system costs be recovered?

All three policy options described below meet existing regulatory and legal requirements for CSO control under the CSO Consent Decree and the West Point NPDES permit and presume existing jurisdictional authority. The Executive's Sewer Rate and Capital Work Program is exploring options to balance regulatory requirements with options to address financial sustainability and affordability.

Policy question #1: How should WTD best upgrade the combined system to address regulatory requirements, regional water quality, and West Point operations?

Policy Option #1: Complete all consent decree (CD) and permit requirements on schedule, using Green Stormwater Infrastructure (GSI) when cost effective.

Policy Option #2: Meet CD and permit requirements and proactively invest in peak flow management to reduce inflow in the combined system to further reduce untreated CSO discharges and reduce strain on West Point Treatment Plant (i.e., redirect some flows from West Point to another treatment plant).

Policy Option #3: Meet CD and permit requirements and go beyond to eliminate untreated CSO discharges through extensive peak flow management, including separation, storage, and GSI.

Table 1. Summary of Policy Options – How should WTD upgrade the Combined System?

	Description	Goals/outcomes	Tradeoffs
#1	Complete all consent decree and permit requirements on schedule, using GSI when cost effective.	Meet CSO control legal obligations to achieve water quality benefits - i.e., no more than one CSO event per outfall per year on a 20-year rolling average.	Meets legal obligations and improves water quality but stacking large CSO capital investments makes it difficult to deliver on regulatory schedule and rate affordability. Costs: consistent with projected CSO expenditures 2026 – 2046 (\$6.5 billion).
#2	Meet CD and permit requirements and proactively invest in peak flow management to reduce inflow in the combined system to further reduce untreated CSO discharges and reduce strain on West Point Treatment Plant (i.e., redirect some flows from West Point to another treatment plant).	Option #1 outcomes and further water quality improvement, as well as reduced burden of peak wet weather flows on combined system and the West Point treatment plant to add capacity for CSO reduction and support compliance, operation, and treatment planning for future West Point upgrades.	Uncertainty about how much programmatic peak flow management would be needed to directly offset future CSO control requirements as system flows and climate impacts could push additional outfalls out of control. Ability to potentially address future regulations at West Point. Qualitative Costs: higher than option #1 projected CSO expenditures.
#3	Meet CD and permit requirements and go beyond to eliminate untreated CSO discharges through extensive peak flow management, including separation, storage, and GSI.	Option #1 outcomes and even more water quality improvement and reduced compliance risk through elimination of untreated discharges of combined sewer/stormwater flows from King County CSO outfalls.	Exceeds regulatory requirements by managing the largest storms (at high cost), improves water quality by eliminating untreated discharges of combined sewer/stormwater flows. Long term compliance risk is reduced. Qualitative Costs: substantially higher costs to disconnect storm flows and add infrastructure to store and treat all peak wet weather flows.

Policy question #2: How should combined system costs be recovered?

WTD has had a uniform sewer rate for over six decades, since 1961 when the first sewer contracts were signed between King County Metro and its local agencies. Under this uniform sewer rate structure, rate payers from each of the 34 Local Sewer Agencies (LSAs) contribute equally to the costs of controlling CSOs regardless of their geography.³ Current contracts with all 34 LSAs maintain the uniform sewer rate.

An alternative would be a CSO surcharge applied to customers within WTD's combined system geography. Since the combined system is entirely within Seattle, this would result in Seattle residents paying more for their wastewater services. A CSO surcharge may be appropriate when paired with a region-wide infiltration/inflow (I/I) surcharge. Another alternative structure is a volume-based rate which could have an impact on the apportionment of the combined system's financial impact.

In November 2026, WTD will provide RWQC with a Rate Structure Policy Memo that will identify various alternative options that differ from the traditional uniform sewer rate. This analysis will include an I/I surcharge for the separated system, a CSO surcharge for the combined system, and a volume-based rate across the entire system amongst other alternatives.

When evaluating alternatives such as I/I and CSO surcharges, it is important to understand and emphasize the history and common interests behind today's regional system and its uniform rate. More than 65 years ago, when Metro was formed in 1958, a regional wastewater system was established to protect water quality across jurisdictional boundaries. Under this regional approach the combined system in Seattle was designed into the structure of the regional wastewater system. At that time the "Basic Sewage Disposal Agreement" was signed between Metro and component agencies. Under this Agreement, Seattle subsidized the expansion of the sewer system into the suburban cities, and Metro took ownership of sewers serving areas larger than 1,000 acres, including many CSO outfalls. In addition, the Agreement put in place the uniform rate per Residential Customer Equivalent (RCE) to be paid by all component agencies. Forward Thrust bonds, approved by King County voters in 1968 and 1970, helped to pay for the separation of sewers in certain portions of Seattle to reduce CSOs.

Since then, the regional system has grown over time and geography and has evolved into a present-day partnership with 34 contract agencies. When considering geography and levels of investment into the regional system (including past and future CSO costs), it is

³ To be more specific than "equal" contribution, each LSA contributes proportionally by RCE.

important to look across the entire time horizon – i.e., since 1961 when the first sewer contract was signed.

Rate payer funds are spent and prioritized based on the system's needs (e.g., like an old house, some years WTD invests in the roof, other years WTD invests in the basement plumbing). In the short-term, certain portions of the service area may see more/less investment. Over long term, the entire system is invested in to ensure all 34 agencies receive the level of service WTD delivers to protect water quality across the region.

G. Interested and affected parties WTD will engage to gather input

WTD will engage MWPAAC and the component agencies to which WTD provides sewerage services on the combined system management policy options. WTD may also engage with tribes, community-based organizations (CBOs), and environmental non-governmental organizations (NGOs), businesses, industries, and the general public during implementation planning.

H. Rate structure considerations

As mentioned above, alternative rate structures that differ from the current uniform sewer rate, such as I/I and CSO surcharges and volume-based rates, will be explored further in the Rate Structure Policy Memo WTD will provide to RWQC in November 2026.

I. Relationship with contracts

WTD's current contracts with all 34 LSAs maintain the uniform sewer rate that has been in place since 1961. Some of these contracts expire in 2036 and others in 2056. These contracts would need to be amended if an alternative to the uniform rate is pursued.

J. Equity and Social Justice (ESJ) impacts

There are ESJ impacts to consider in both the question of how to upgrade the combined system and the exploration of how to structure rates to address combined system costs. Considerations include: the neighborhoods and populations currently most negatively impacted by uncontrolled CSOs, the neighborhoods and waterways most likely to receive direct or co-benefits of environmental and public health improvements, and the affordability of the sewer rate to lower income households, however it is structured.

Policy option #1 includes completion of legally mandated CSO capital project delivery in geographically specific locations. These projects will generate unique impacts to surrounding communities and those who rely upon or temporarily encounter the project area. The neighborhoods where CSO controls are planned vary substantially by income

and race. The impacts from the CSO control projects may be positive or negative, ranging from enhanced water quality during wet weather to construction disruptions to right-of-way improvements.

Policy options #2 and #3 include the impacts of policy option #1 as well as added positive and negative impacts of further control measures in additional geographies.

The Step 2 analysis in 2027 will evaluate in greater detail the potential ESJ impacts associated with policy options 1, 2, and 3.

The ESJ impacts of alternative rate structures to address combined system costs, such as a CSO surcharge and volume-based rate, will be evaluated in a forthcoming policy memo in November 2027 addressing the rate structure topic.

K. Planning-level cost estimates

This section will be added into the policy memo as the “Step 2” analysis later.

L. Evaluation of outcomes: identify impacts and outcomes of each option

This section will be added into the policy memo as the “Step 2” analysis later.

RWQC Work Program for 2026 August 5, 2026

The suggested agenda topics are based on the latest information available and are subject to change based on the availability of presenters and committee priorities. This work program will stay marked as “draft” to reflect that the committee will adjust the schedule throughout the year to accommodate any necessary changes.

RWSP Policy Analysis and RWQC

WTD is currently working on a multi-year plan to update the Regional Wastewater Services Plan. On January 16, 2025, the King County Council adopted the RWSP Update scope document to guide the update process. The scope document identifies policy questions to be analyzed as part of the RWSP Update. RWQC will have the opportunity to review the policy analysis both before and after the Draft RWSP is released.

Pre-Draft RWSP Update. Beginning in March 2026, the Wastewater Treatment Division (WTD) plans to present the initial analysis of selected policy questions from the RWSP Update scope document. WTD refers to this stage of the analysis for these policy questions as Step 1. Related policy questions will be grouped together. The intent of the initial Step 1 briefings is for members to receive information on each policy question and identify any gaps in the information or options presented by WTD. WTD’s initial analysis of the policy questions will provide a framework for the committee for future discussions on these policy questions. WTD expects the options presented at these initial briefings and any additional RWQC-identified options to be included in the Draft RWSP Update. WTD will accept feedback and suggestions on each group of policy questions during the month the analysis is presented to RWQC.

Beginning in Q4 2026 and continuing through Q3 2027, WTD intends to present cost information to RWQC on a rolling basis for the options related to each policy question. WTD refers to this cost information as Step 2. With this cost information, RWQC will have the opportunity to revisit any options it requested for analysis for inclusion in the DRAFT RWSP Update . All requested analysis and cost information for the policy questions is anticipated to be completed by Q3 2027.

After the DRAFT RWSP Update released. The Draft RWSP Update is scheduled for completion at the end of 2027. and RWQC will have another opportunity at this time to make comments to the Executive on the Draft RWSP Update The Executive will then develop the final Proposed Plan and transmit it to Council by the end of 2028 for Council adoption in 2029, at which time RWQC will have the opportunity to review and amend the plan.

MONTHLY MEETING SCHEDULE

January 7, 2026

- ✓ Regional Wastewater Services Plan Update: Update on RWSP Policy Analysis as Required by Proviso. This briefing will present the proposed schedule and grouping of policy questions.
- ✓ 2026 RWQC Work Program.

February 4, 2026

- ✓ An Overview of Water Quality in Puget Sound. Presentation by the Water and Land Resources Division, DNRP.
- ✓ Wastewater Treatment Division's Preliminary 2027 Sewer Rate and Capacity Charge, Including Rate Options.

March 4, 2026

- ✓ Proviso Response and Regional Wastewater Services Plan Update Policy Questions Initial Analysis Group 1: Separated System Conveyance (future conveyance capacity of the system, including Inflow and Infiltration and population growth.)
- ✓ WTD's 2027 Sewer Rate and Capacity Charge Recommendations and Options.
- ✓ WTD Initial Presentation Prior to Ordinance Transmittal on Proposed Capacity Charge Code Changes.

March 26, 2026 9-11 am. Optional Site Visit to South Plant to tour capital projects and compost pilot. This is not a RWQC meeting.

April 1, 2026

- ✓ Proviso Response and Regional Wastewater Services Plan Update Policy Questions Initial Analysis Group 2: Source Control and Legacy Pollution.
- ✓ WTD's 2027 Sewer Rate and Capacity Charge Recommendations and Options
- ✓ If transmitted and time available, Proposed Capacity Charge Code Changes.

May 6, 2026

- ✓ Executive's Proposed 2027 Sewer Rate and Capacity Charge.
- ✓ Proviso Response on RWSP Policy Questions.
- ✓ Regional Wastewater Services Plan Update Policy Questions Initial Analysis Group 3: Asset Renewal and Replacement.
- ✓ Proposed Ordinance 2026-0066. Capacity Charge Code Changes.

June 3, 2026

- ✓ Proposed Ordinance 2026-0066 on Capacity Charge Code Changes.
- ✓ Regional Wastewater Services Plan Update: Policy Questions Initial Analysis Group 4: Climate Impact and Natural Disaster Resiliency.
- ✓ Executive's Proposed 2027 Sewer Rate and Capacity Charge.

June 25, 2026 Optional Visit to South Plant Treatment**July 1, 2026**

- ✓ Regional Wastewater Services Plan Update Policy Questions Initial Analysis Group 5: Finance/Affordability.
- ✓ Capital Project Cost Update per proviso (Written).

August 5, 2026 (This is considered a special meeting due to Council Recess)

- ☐ Department of Ecology: Washington's Water Future Initiative. (20 minutes)
- ☐ Integrating Financial and System Sustainability. Briefing by Edward Cebon. (35 minutes)
- ☐ Regional Wastewater Services Plan Update Policy Questions Initial Analysis Group 6: Combined System Management. (35 minutes).

September 3, 2026

- ☐ Regional Wastewater Services Plan Update Policy Questions Initial Analysis Group 7: Level of Treatment (80 minutes).
- ☐ Regional Wastewater Services Plan Vision (15 minutes)

September Optional Site Visit to Brightwater. Date TDB.**October 1, 2026**

- ☐ Regional Wastewater Services Plan Update Policy Questions Initial Analysis Group 8: Resource Recovery (60 minutes).
- ☐ Update on Puget Sound Nutrient Issue (30 minutes).
- ☐ Capital Project Cost Update per proviso (Written).

November 5, 2026

- ☐ Regional Wastewater Services Plan Update Policy Questions Initial Analysis
Group 9: Rate structure questions (70 minutes)

December 3, 2026

- ☐ Stormwater Update (35 minutes)
- ☐ Regional Wastewater Services Plan Update Policy Questions Initial Analysis
Summary Groups 1-9 (30 minutes)
- ☐ Capital Project Cost Update per proviso (Written).
- ☐ PFAS Annual Update (20 minutes).

Note for RWSP Update—Policy Analysis. Costing information for Policy Questions Groups #1-9 will be provided in 2027.

Monthly Written Report on Status Update for Motion 16900:

Committee requests monthly status report include status update on key tasks in Motion 16900, (WTD's sewer rate and capital work plan to improve engagement, transparency, and accountability) including:

- Develop and implement a process for MWPAAC and RWQC (as requested) to review a limited number of large capital projects selected by MWPAAC that substantively affect the rate.
- Develop public engagement strategy for rate payers in coordination with local contract agencies to explain why wholesale WTD rates are increasing and provide opportunities for public engagement.
- Independent consultant to review WTD's capital program.
- Evaluate regulatory requirements.
- Significant changes in capital project costs.
- Options for multi-year rate predictability.