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CHAPTER 10

A Decade of Change

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1990 - 1999

he last decade of the twentieth century brought less technological change to Edmonton Power than previous decades had. However, it presented the utility with significant political and social challenges. A public debate over privatizing the utility raged in the media and at City Council. Further, the provincial electrical industry changed in fundamental ways.

While Edmonton Power could do little to respond to the privatization debate, it had to address the shifts in its industry if it wished to remain a viable entity. Thus, it completely reworked the way it operated. It could no longer appear or act like a municipal department. By the end of the decade, it had shed its old name, it had begun a process of rapid expansion, and it investigated new ways to market electricity to customers. In short, it operated as a business competing in a difficult market.

RESTRUCTURING

The changes made to Alberta's electrical industry in the 1990s resulted from government efforts to alter its regulatory practices. Edmonton Power and other stakeholders had input into this restructuring process.

Under the system that prevailed in Alberta before restructuring, a company that wished to generate and sell electricity had to demonstrate that there was a need for new generating capacity — hence Edmonton Power's long struggle to win approval for Genesee. The provincial government regulated the generation, transmission, distribution, and retail sale of electricity. Alberta started a review of these policies in 1993; this resulted in the Electric Utilities Act of 1995, which called for a

MILESTONES

1990

The Edmonton Oilers win their fifth Stanley Cup in seven years.

1992

Jack Cressey is appointed chair of Edmonton Power (now Edmonton Power Authority). A board of directors is also appointed.

1993

Edmonton's new city hall opens.

David Foy replaces Ed Kyte as president and CEO of Edmonton Power Authority.

1994

Bob Phillips replaces the late Jack Cressey as chair of Edmonton Power.

1995

Bill Smith becomes mayor of Edmonton.

1998

Don Lowry is appointed Edmonton Power Authority's president and CEO.

1999

EPCOR buys 18,000 tonnes of emission reductions.

EPCOR begins selling natural gas.

EPCOR receives an award for its environmental initiatives.

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ED KYTE President and CEO June 1977 – May 1993

Ed Kyte began his career with the Distribution Department in 1969. He became general manager of Edmonton Power in 1977, when it was still a city department. When Edmonton Power Authority was established in 1992, Ed became the first president of the emerging corporation, and served in that capacity until his retirement in 1993.



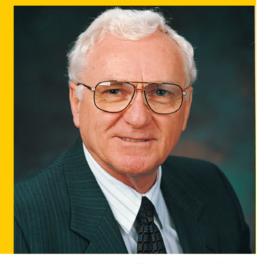
JACK CRESSEY Chair September 1992 – July 1994

Following City Council's decision in 1992 to create a Board of Authority as an interim step to full incorporation, A.J. (Jack) Cressey was appointed as Edmonton Power's first chair. A graduate in arts and law, Cressey had previously served in executive positions in a number of companies.

Unfortunately, Jack's dream for the company had to be passed on to others. Jack passed away following a cycling accident in July 1994.

restructuring of the electrical industry. Under the Electric Utilities Act, generation and retail of electricity would no longer be subject to government regulation, though transmission and distribution would be. Residential consumers would be free to choose a maker but not a distributor of electricity.

On January 1, 1996, the Electric Utilities Act created the Power Pool of Alberta. This pool differed from the one that had existed previously. The Power Pool of Alberta acted as an "electricity



store"; generators offered blocks of power for sale and the pool matched them with retailers. The pool matched retail bids with the generators' price offers.

The new shape of the electrical industry had far reaching implications for Edmonton Power: its customer base was no longer comprised of just its owners – the citizens of Edmonton. The utility would have to compete in a regional, national, and international marketplace. The former City department was reor-

ganized and changed its attitude about competition.

These changes were phased in during a long and complicated transitional period. First, the utility became Edmonton Power Authority. In 1992, a board of directors was established. The mayor sat on this board, though the City's primary role was to ensure that its interests were being protected. In 1995, Edmonton Power became a fully incorporated company, no longer a department of the City of Edmonton. Eventually, the mayor no longer sat on the board of directors, though City Council still approved annual business plans, budgets, and received quarterly updates.

Edmonton Power had a number of subsidiaries during this transitional period. Eltec was responsible for non-regulated activities such as streetlight maintenance. Edmonton Power was made responsible for water supply and distribution in the city; a subsidiary called Aqualta was created to operate the waterworks.

Another organizational change occurred in 1996, this time involving a complete change of name. A new corporate umbrella, EPCOR, was formed. All subsidiaries were now under this umbrella. Eventually, Aqualta became EPCOR Water Services Inc., and Eltec was renamed EPCOR Technologies Inc. EPCOR continued to be governed by a board of directors, and the City of Edmonton continued to be the sole shareholder. Encore Energy Solutions was formed, initially with other energy companies, to market electricity pack - ages outside of Edmonton.

EPCOR was given a new logo and a new image a few years later. A news release issued on October 4, 1999 read: New Look EPCOR Launches One Brand, Many Services

In a news conference with a definite customer focus, Don Lowry, president and CEO of EPCOR, today announced that effective immediately, Edmonton Power, Aqualta, and Eltec will all be known as EPCOR – a single, unified source for essential residential and commercial utility services.

EPCOR's Initial Public Offering, or IPO, in the summer of 1999 marked an important milestone in the company's transition to the private business community. EPCOR offered \$150 million of long-term debt to private investors; the debt sold quickly. Brian Vaasjo, executive vice president and chief financial officer at the time, remarked that the IPO was a "tremendous success," and credited

the obvious quality of the company's assets, strategies, and people. The organization absolutely impressed the financial community including both dealers and investors. This is yet another example of this company's ability to perform with the very best.

EXPANSION

Demand for electricity increased rapidly during the 1990s. To meet the demand, a second unit was installed at the Genesee Power Plant. On December 2, 1993, the new unit was synchronized with the Alberta Interconnected System for the first time, and was fired with coal on December 7. It began commercial operation in early 1994.

In the 1990s, EPCOR added to its gen-

erating capacity by building new plants, with or without partners, or by purchasing existing plants. Due to rapid demand growth and the newly competitive generating market, growth took place much faster than in previous decades. For example, in 1998, EPCOR entered into a joint venture with two other utilities to build a \$320 million 416 MW co-generation plant in Joffre, Alberta. This became operational early in the new century.

PRIVATIZATION

EPCOR, in all its iterations, had long provided the City of Edmonton with respectable returns. The utility was viewed by many Edmontonians as not just a source of revenue and a valuable asset, but also as an object of civic pride. However, in the new operating environment of the late 1990s, other Edmontonians began to question the City's involvement in the electrical industry. The regulatory protections that had insulated the City against risk were gone. EPCOR was competing in a free market, and was therefore subject to not only greater returns than before, but also greater risks. Additionally, the utility was worth a great deal of money; if it sold EPCOR, the City would not only be protecting itself from risk, it would also experience a revenue windfall.

In an effort to come to a decision on whether or not to sell EPCOR, the City of Edmonton hired analysts from RBC Dominion Securities to assess whether or not it would be financially wise to proceed with the sale. The report concluded that EPCOR would be attractive to private investors, and that the City should sell it. According to Kevin Taft, an independent researcher, the RBC report was contradictory – telling the



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TOP: The cogeneration plant at Joffre, Alberta was a product of cooperation between EPCOR and other Alberta companies.

ABOVE: Edmonton Power added a generating unit to its Genesee Power Plant in the early 1990s.

SENIORS, LABOUR PROTEST SALE OF UTILITY

Citizens were mad as hell about the possible sale of EPCOR Thursday and said so loudly outside city hall, while council debated the future of the utility.

More than 100 protesters from senior citizen groups and labour organizations, as well as New Democrat MLA Raj Pannu, braved cold winds to tell council not to privatize EPCOR.

One senior carried a placard promising to "haunt" Mayor Bill Smith at election time should he support selling the utility.

Another protester bore a sign that said, "Keep EPCOR: Sell Bill Smith."

Many people took the possible sale of EPCOR personally, saying it would betray Edmontonians and leave them at the mercy of a faceless corporation that wasn't accountable to the public.

"To our generation, it's something we've built."

Many protesters called for a plebiscite, while others questioned the motives of councilors who supported privatization, accusing them of being too cozy with business.

"It would be selling off our heritage."

"This is the most valuable asset we have in this city and it belongs to its citizens. I find it strange that City Council should consider selling it without consulting citizens."

From The Edmonton Journal,
1999

CANDLES TO KILOWATTS

City that the utility was a risky business, while recommending to investors that EPCOR was a secure company with a wonderful long-term future.

Edmontonians protested the sale of EPCOR when the issue came to light. Many of them called the Citizen's Action Centre, a call centre that allowed people to voice their opinions. According to one report, within the first half of the year the Citizen's Action Centre received 251 calls from people who were against the sale, 59 from people who were looking for more information, and only 2 from people who were in favour of the sale. In one day, 189 calls were received, 172 of which were opposed to the sale. Meanwhile, the near-centuryold municipally-owned utility, which had committed itself to accepting whatever the public decided, sat tight and waited for an outcome.

Finally, after much public and internal debate, Edmonton City Council defeated a motion on Thursday July 15, 1999 to "have City administrators and EPCOR's board look at market interest for privatizing EPCOR." It was felt by many that too little was known about the restructuring of the electrical industry, and that a more cautious approach was in order.

ROSSDALE DEPOWERS

Much of the Rossdale Power Plant had become obsolete by the early 1990s. In 1992, Edmonton Power began the process of decommissioning the Low Pressure Plant and the Gas Turbine House. From 1992 to 1998, the two gas turbines, five steam turbines, and seven boilers were taken out of service and removed from the building. With the exception of three operational units,





Rossdale stood empty, waiting for decision makers to determine how best to use the building shell.

EPCOR wanted to make better use of one of the three existing units. It proposed the installation of a gas turbine. At least part of the Low Pressure Plant would have to be demolished to accommodate the new turbine; however, in addition to producing 170 MW of electrical power, the new turbine would

TOP and ABOVE and OVER: Last looks: the Rossdale Low Pressure Plant was depowered in the 1990s, and its generating equipment was removed.

produce exhaust gases hot enough to generate steam. This steam would operate number 8 steam turbine. EPCOR also wished to change the appearance of the High Pressure Plant so it would match the addition to the Low Pressure Plant building. City









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David Foy President and CEO October 1993 – September 1997

In October 1993, David Foy joined Edmonton Power as its president and chief executive officer. Foy came to EPCOR with a broad background of experience, including three years as president and CEO of Phillips Cables, a leading manufacturer of wire and cable.



Council approved this plan near the end of 1999.

Once it was made public, this plan sparked a storm of controversy; citizens and environmental groups spoke out in opposition to EPCOR's proposal. Many felt that the historic Low Pressure Plant building was worthy of preservation. Others felt that the method of power generation was inappropriate. Once again, the electrical utility sought a way to respond in a way that addressed citizen's concerns.

The matter came to a close early in the new century. A number of significant archeological finds had been made on the Rossdale site, including the remains of an early Fort Edmonton and a burial ground. To many, these finds added weight to earlier arguments about Rossdale's historical significance. On October 17, 2001, the provincial government designated the Low Pressure Plant, the Administration Building, and number 1 pumphouse as historical resources. On October 25, EPCOR announced that it was no longer interested in repowering Rossdale.

DISTRIBUTION AND TRANSMISSION

EPCOR's distribution and transmission systems required renovation in order to take advantage of the latest technology, to improve efficiency, and thus to better serve the customer.

In 1993, the underground distribution system in the Westbrook (southwest Edmonton) area was completely rebuilt.

LEFT and OPPOSITE BOTTOM RIGHT:

Full circle: remnants of an early Fort Edmonton were discovered on the Rossdale site. The row of stumps shown are believed to be remains of a wall at the fort.

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NEWSFLASH!

December 4, 1996

Power Crews Return from Lending Emergency Assistance Stateside

Edmonton power crews returned home late Tuesday night from Coeur d'Alene, Idaho, after pitching in with emergency power restoration efforts. A series of ice storms in Washington and Idaho caused such severe damage that local power companies sent out requests for assistance from neighbouring utilities, including Edmonton Power.

"Given the severity of damage in the states of Washington and Idaho, with tens of thousands of people without power, when the request for assistance came we were pleased and proud to be able to respond," said David Foy, president and chief executive officer of Edmonton Power's parent company EPCOR.

Three aerial crews, one service crew plus a supervisor, totalling ten employees, were sent to the area on Friday, November 22. Together they returned tired but very proud of their efforts. "We worked with crews from all over the northwestern United States and some from British Columbia," stated Gary Paul, supervisor of the crews in Idaho. "The weather continued to work against us, hampering efforts for the longest time, but all of us persevered and the state of emergency in Idaho has now been lifted."

"Pitching in to help other utilities in the face of crisis is part of our business," commented Foy.
"Some of our crews remember the help that was needed when the tornado struck just outside Edmonton, they were eager to be there for others."

"Our crews are highly skilled and well trained for emergency situations; this unfortunate circumstance also provided them with the opportunity for hands-on experience in an emergency situation," concluded Foy. **LEFT and OPPOSITE:** EPCOR adopted news releases and other public relations strategies typical of large companies as it became a corporation.

This involved special tunneling equipment and about 24,000 meters of cable. Edmonton Telephones and Videotron, a private company, assisted in the completion of the project; the general public also helped by enabling the utility to complete work without causing disruption to the community. Two main transformers that served downtown were also upgraded to handle 15 percent more capacity.

Throughout the decade, response to customer demand was both efficient and effective. By 1999, the utility was able to boast of 565 km of transmission lines (278 km aerial, 287 km underground) and 9,117 km of distribution lines. These lines provided services to 270,000 customers, 242,000 of which were residential and 28,000 were commercial.

Focus on the Environment

The environmental movement was extremely influential in the 1990s. Society had become aware that it was producing huge amounts of garbage and air and water pollution, and that "greenhouse gases" could be causing the Earth's climate to change. Industries and consumers around the world found ways to save energy, to reduce waste, and to recycle what waste couldn't be eliminated. Environmentally friendly products appeared on store shelves.

In preceding decades, Edmonton's electrical utility had often taken steps to protect the environment. Starting in the 1990s, the utility advanced its leadership position in environmental matters with a

number of new initiatives. One was the use of landfill gas (LFG) as a fuel in its boilers.

LFG is produced when organic wastes decompose in landfills. As organic wastes comprise a large proportion of any landfill, a great deal of LFG is produced each year. The primary ingredient of LFG is methane gas, one of the more potent greenhouse gases. Burning LFG not only helps to conserve fossil fuels, it also converts methane into less damaging gases, and improves air quality near landfills.

Edmonton Power partnered with Environmental Technologies Inc. to develop an extraction and refining process for LFG. In 1992, the Clover Bar Landfill Gas Recovery and Treatment Plant was opened. A series of wells drilled into the landfill collected LFG, which was then conveyed to the treatment facility via a network of pipes. There, it was prepared for use as boiler fuel. Approximately 0.9 percent of Clover Bar's fuel is LFG. As of 1998, the project had recovered 93 million m³ of LFG from the landfill. In 1997 alone, sufficient LFG was recovered to meet the electrical needs of about 4,200 homes.

Edmonton Power published its first environmental policy in 1992. This policy expressed a commitment to environmentally sensitive and efficient approaches to power production that responded to public concerns.

This new policy would provide a backdrop for the various programs
Edmonton Power and EPCOR developed and implemented over the remainder of the decade. Not only would the company comply with legal limits placed on emissions, it set goals to



ANOTHER FIRST!

October 25, 1999

TRADING PROCESS PROMOTES CARBON DIOXIDE REDUCTIONS
In keeping with its commitment to help Canada meet
its carbon dioxide reduction targets, EPCOR Utilities Inc. announced that it has completed the
world's first carbon dioxide trade conducted through
a commodity exchange.

EPCOR purchased 18,000 tonnes of emission reductions from TransAlta Utilities through the newly formed, Alberta-based KEFI Exchange. The 18,000 tonnes of carbon dioxide represented in the trade is equal to the annual emissions of about 3,000 automobiles.

"The fact that EPCOR and TransAlta have come forward to make the deal demonstrates their commitment to helping create innovative, market-based approaches to managing greenhouse gas emissions," says Sheldon Fulton, president of KEFI Exchange.

For EPCOR, emission trading represents just one element of an integrated climate change program, which also includes:

- * Commitment to renewable and alternate energy (i.e., landfill gas, solar, small hydro projects)
- * Energy efficiency at our generating stations
- $\ensuremath{^{\star}}$ Working with our customers to reduce energy consumption
- * Carbon sequestration (i.e., using trees and soils to capture carbon dioxide from the air)

This emission trade would be the first of several. Look for further discussion on this topic in the Afterword.

exceed government expectations. In fact, environmental concern would be a large factor in the company's response to restructuring as the century came to a close.

In 1993, as Edmonton Power was

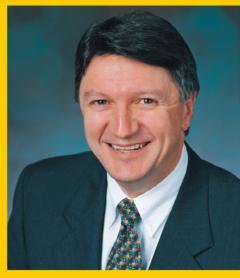
"getting its feet wet" with its new environment policy, some very practical, customer related activities were undertaken. One of these was the "Old Fridge Roundup." Three thousand, three hundred and eighty four used fridges and

ROB PHILLIPS Chair

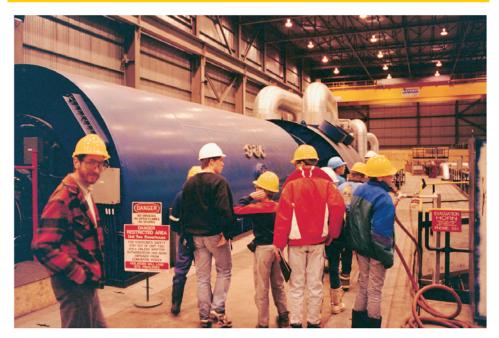
November 1994 – December 1998

In November of 1994, City Council appointed Bob Phillips as chair of EPCOR. Educated in engineering and law, Phillips had previously served a number of large corporations, including Husky Oil, as vice president. He was also a Trustee of the Canadian Parks and Wilderness Society.

Phillips is a strong supporter of lifelong learning. "It's something I believe in and something I've instilled in my children. People may look at my background and say, 'This guy changes jobs a lot; he must get bored easily,' but that's not it. I like new challenges, new things to learn." And that is how he saw his work with EPCOR.



Phillips was born and raised in Edmonton. He and his wife and two children now reside in British Columbia.



freezers were collected from individuals, and from these 918 kg of chloro-fluorocarbons (CFCs) were recovered, along with 382 tonnes of recycled metal. This was beneficial because CFCs contribute to the destruction of the ozone layer, and the estimated future savings in electricity use came to nearly 3.9 million kWh

Edmonton Power's Environmental Policy

As part of its environment policy, Edmonton Power endeavored to maintain:

- A well-managed energy resource, where energy is rationalized to total community needs now and in the future.
- Efficient approaches to the production and distribution of energy that conserve, protect, and respect the environment.
- A global perspective on the issue of energy, to ensure that our activities and policies are consistent with the environmental welfare of the world.
- An open mind and a willingness to try new ideas.
- A relationship of trust with members of our community.
- An involvement and commitment by our staff to work together in developing environmental solutions
- A recognition that concern for the environment is every individual's responsibility.

From the Edmonton Power 1992 Annual Report

LEFT: A group of scouts tours the Genesee Power Plant in the 1990s.

per year.

The PCB elimination program continued with the removal or decontamination of 208 transformers and 33 capacitors in 1993. By 1999, after testing 2,774 transformers, only 37 contained PCB concentrations higher than 150 parts per million (PPM). Government regulations allow 200 PPM, while EPCOR's standard is 150 PPM. Contaminated oil from these 37



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EPCOR AND NATURAL GAS

By the end of the twentieth century, EPCOR had been a consumer of natural gas for decades: many of its burners used the fuel. But in October 1999, the utility also became a supplier of natural gas when it began offering the fuel to industrial and commercial customers. Then, in December of the same year, EPCOR purchased Alberta Natural Gas Savings Corporation (ANGSC) and gained access to that company's customer base of 30,000 residential consumers.

transformers was disposed of at the Swan Hills Waste Treatment Facility.

In 1997, the Canadian government agreed to follow the terms of the Kyoto Protocol, which committed the country to reduce its greenhouse gas emissions by six percent of 1990 levels. This posed a major challenge to fossil fuel-based industries such as EPCOR. Carbon dioxide (CO₂), which is emitted when fossil fuels are burned, is one of the main contributors to greenhouse gases. Consequently, Rossdale, Clover Bar, and Genesee needed to be assessed in terms of the possibilities for further cost-effective emissions reductions.

As a step toward meeting the Kyoto target, EPCOR voluntarily committed itself to reduce its CO₂ emissions by one million tonnes annually by the year 2000. To achieve this, generating stations were made more efficient, landfill gas use was increased, wooden poles were recycled, trees were planted, and solar electric generation was introduced. The combined efforts of numerous programs allowed the company to state "our overall

Don Lowry
President and CEO
February 1998 - present

As past chair of Alta Telecom Inc. and the president and chief operating officer of Telus Communications Inc., Lowry came to EPCOR with a strong background in leading companies through the transitions of a restructuring market. When he accepted his new position, he was quoted as saying:

I am impressed with the many accomplishments that EPCOR and its subsidiaries have achieved over the past few years. I look forward to working with the EPCOR team as together we face the challenges of [restructuring]

Lowry, his wife, and their two children live in Edmonton.

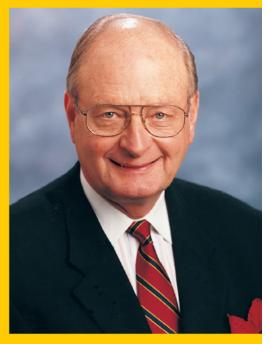
Hugh Bolton

Chair

January 2000 - present

In January 2000, Edmonton City Council appointed Hugh Bolton as EPCOR's third chair of the board. Bolton is a respected senior business executive who recently retired from Pricewaterhouse-Coopers in Toronto, where he had a six-year term as chair and chief executive partner of Coopers and Lybrand Canada.

Bolton has a wealth of senior domestic and international business experience. His experience is particularly valuable as EPCOR expands its customer base beyond Edmonton's city limits, beyond the provincial boundaries, and into the North American market.



Solar Power Tops the EPCOR Tower

Have you ever wondered what is on top of the glass, steel, and concrete towers that loom over Jasper Avenue, Edmonton's main downtown artery? Probably not. But if you entered EPCOR Centre and took the elevator all the way up to the rooftop, you'd be in for a bit of a surprise. There, basking in the sun every day of the year, is a series of photovoltaic cells that provide 13 kW of power to the Power Pool of Alberta. Not only does this system produce power to EPCOR's Green Power program, it also provides heating, ventilation, and air-conditioning savings to the building by shading the roof in summer and providing between R15 and R20 insulation in the winter.

When it was installed in November 1996, the system achieved some milestones for building-integrated photovoltaics (BIPV):

- It was the highest elevation BIPV project ever mounted on a building;
- It was the largest BIPV project in Canada, and the third largest photovoltaic system in Canada.

EPCOR's BIPV project was a successful – and profitable – venture.

ABOVE: The solar array atop EPCOR's corporate offices in downtown Edmonton.

RIGHT: The solar array under construction in November, 1996.





IIO CANDLES TO KILOWATTS



program of reductions and offsets now totals 1,149,800 tonnes per year to be delivered in 2000." Not only had EPCOR reached its goal, it had exceeded it.

The International Standards Organization (ISO) wished to encourage companies to work on their environmental performance. It established an internationally-recognized environmental standard called ISO 14001.

Compliance with these standards is voluntary. In 2000 EPCOR became the first utility in Canada to have all of its generating plants meet ISO 14001 standards; distribution and transmission operations became registered in 2001.

The late 1990s also brought about the introduction of the Green Power Program. This allowed customers to purchase energy from such sources as solar, wind, small hydro, and biomass

PEREGRINES AT GENESEE

The fastest animal on the planet – and one of Canada's most endangered species – has flourished at Genesee for more than a decade.

The peregrine falcon has never been common; populations are naturally sparse because a breeding couple will jealously defend a large territory. However, the birds were once found in every part of Canada except a few high Arctic islands and Newfoundland; its range also extended south to the United States-Mexico border. Unfortunately, they vanished from most of this range in the mid-twentieth century, victims of DDT, a pesticide used in agriculture. By the late 1960s, peregrines could no longer be found in most of southern Canada; the species was listed as endangered in 1971.

Bob Joyes, a maintenance foreman at EPCOR's Genesee plant, suspects that peregrines first began nesting at the station in 1989. That's when staff first noted nests built near the station's fresh air intake. It wasn't until 1993 that a security guard positively identified the raptor's distinctive markings.

It is not a complete surprise that the birds choose a generating station as a place to raise their young year after year. The air intake is well protected from the elements and is hidden from view. Another draw could be the plant's cooling ponds; gulls, ducks, and pigeons, all peregrine prey, live around the water's edge. Bob Joyes has watched the birds hunt in pairs: one bird flushes out the prey, and the other swoops in from a hiding place to kill the unsuspecting victim.

After discovering the raptors in their midst, Genesee staff installed an expertly-designed nesting box on the plant's giant smoke stack. From this vantage point, the birds had an excellent view of their hunting grounds, and could raise their young in seclusion. Joyes speculated that as many as three or four chicks were raised most years. He noted that the young sometimes try to return to Genesee, but the parents, territorial birds that they are, drive their grown-up offspring away.

Genesee's peregrines starred in "The Return of the Peregrine," a documentary aired on CBC's *The Nature of Things* in December 2001. Aside from this attention, the peregrines have been allowed to hunt and raise their young in solitude.

Sources: Alberta's Threatened Wildlife and an interview with Bob Joyes. Prepared by David Strand

(wood wastes) combustion for \$10 to \$40 per month over their conventional power bill. For every unit of Green Power used, less fossil fuel was used. By the end of 2000, 3,100 customers had signed up.

The first decade of the twenty-first cen-

tury would herald EPCOR's second century of operation as a municipal utility. It would also usher in a completely restructured marketplace. With an aggressive expansion plan in place along with a sound environmental policy, EPCOR was well-positioned to compete successfully and responsibly in this