
City of Greater Sudbury

*2013 Year-end report
to the Audit Committee*

*Prepared as of
June 3, 2014*





June 3, 2014

Members of the Audit Committee
City of Greater Sudbury

Dear Members of the Audit Committee:

We have substantially completed our audit of the consolidated financial statements of the City of Greater Sudbury (the City) prepared in accordance with Canadian generally accepted accounting standards as established by the Public Sector Accounting Board (Public Sector GAAP) for the year ended December 31, 2013. We propose to issue an unqualified report on those financial statements, pending resolution of outstanding items outlined on page 1. Our draft auditor's report is included as Appendix A.

We have issued the accompanying report to assist you in your review of the financial statements. It includes an update on the status of our work, as well as a discussion on the significant accounting and financial reporting issues dealt with during the audit process.

The matters raised in this report are only those that have come to our attention arising from or relevant to our audit that we believe need to be brought to your attention. This report has been prepared solely for the use of the Audit Committee, Council and management, and should not be used by anyone other than these specified parties. We disclaim any responsibility to any third party who may rely on it.

We propose to review the key elements of this report at the upcoming meeting and discuss with you our key findings.

We would like to express our sincere thanks to the management and the staff of the City who have assisted us in carrying out our work and we look forward to our meeting on June 17, 2014. Should you have any questions or concerns prior to the Audit Committee meeting, please do not hesitate to contact me in advance.

Yours very truly,

PricewaterhouseCoopers LLP

Michael Hawtin
Partner
Audit and Assurance Group

cc: Ms. Lorella Hayes, Chief Financial Officer / Treasurer

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PwC refers to PricewaterhouseCoopers LLP, an Ontario limited liability partnership.

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The matters raised in this and other reports that will flow from the audit are only those that have come to our attention arising from or relevant to our audit that we believe need to be brought to your attention. They are not a comprehensive record of all the matters arising and, in particular, we cannot be held responsible for reporting all risks in your business or all internal control weaknesses. This report has been prepared solely for your use and should not be quoted in whole or in part without our prior written consent. No responsibility to any third party is accepted, as the report has not been prepared for, and is not intended for, any other purpose. Comments and conclusions should only be taken in context of the financial statements as a whole as we do not mean to express an opinion on any individual item or accounting estimate.

1. *Executive summary*

a. Status of the audit

We have substantially completed our audit of the 2013 consolidated financial statements. Our auditor's report will be issued once we receive and have completed our audit work on the outstanding items noted below.

This document includes the required communications between an auditor and Audit Committee, as required by Canadian generally accepted auditing standards (Canadian GAAS).

Our audit has been performed substantially in accordance with the plan and timeline previously communicated to you at the October 22, 2013 Audit Committee meeting.

The following items will need to be completed/received prior to the issuance of our opinion. We will provide an update on the status of these items at our upcoming meeting.

Outstanding items
i. Completion of subsequent event procedures up to the date of our auditor's report
ii. Receipt of signed management representation letter
iii. Approval of the financial statements by Council

b. Key issues for discussion

Discussion item	Summary	For further reference
Significant audit, accounting and financial reporting matters	<ul style="list-style-type: none"> Section 2 of our report discusses the areas that we focused on in conducting our audit and significant accounting matters which we believe should be brought to your attention. These areas comprise the following: <ul style="list-style-type: none"> New accounting standards adopted during the year; Significant estimates and areas of management judgment; and Management override of controls. 	Section 2
Summary of unadjusted and adjusted items	<ul style="list-style-type: none"> There are no unadjusted or adjusted items as a result of our audit. In our opinion, the financial statements, taken as a whole, are free of material misstatement. A copy of our draft auditor's report can be found in Appendix A. 	Section 3 and Appendix A
Internal control recommendations	<ul style="list-style-type: none"> We issued a report in June 2013 summarizing our internal control observations and recommendations as they related to the 2011 and 2012 audits. An update on the remediation status of these internal control observations can be found in Appendix D. No new internal control observations were identified during the 2013 audit. 	Appendix D
Independence	<ul style="list-style-type: none"> We confirm that we are independent of the City as at the date of this report, and our independence letter can be found in Appendix C. 	Appendix C

Discussion item	Summary	For further reference
Fraud	<ul style="list-style-type: none">No instances of fraud were noted as part of our audit procedures.We wish to reconfirm whether the Audit Committee is aware of any known, suspected or alleged incidents of fraud.	
Management representations	<ul style="list-style-type: none">Under Canadian GAAS, we are required to inform you of the representations we are requesting from management. A copy of the management representation letter is included in Appendix B.	Appendix B

2. *Significant audit, accounting and financial reporting matters*

Preparation of the consolidated financial statements requires management to select accounting policies, as well as make critical accounting estimates and disclosures that may involve significant judgment and measurement uncertainty. These matters can significantly impact the City's reported results.

We are responsible for discussing with the Audit Committee our views about the significant qualitative aspects of the City's accounting practices, including accounting policies, the accounting estimates, and financial statement disclosures.

Our comments and views included in this report should only be taken in the context of the consolidated financial statements as a whole and are not meant to express an opinion on any individual item or accounting estimate. We are sharing our views with you to facilitate an open dialogue of these matters.

During the audit, we dealt with the following complex issues, areas of judgment and significant audit risks:

Item 1	New accounting standards adopted during the year
Background information	<p>The City adopted the following accounting standards during the year ended December 31, 2013:</p> <ul style="list-style-type: none"> a) Government transfers - PS 3410 was effective for fiscal years beginning on or after April 1, 2012. In accordance with the transitional provisions, the City has adopted this revised standard on January 1, 2013 on a prospective basis. This section provides additional guidance on recognition of government transfers. Under the revised accounting standard, revenue from government transfers is recognized when the transfer is authorized and all eligibility criteria have been met (if applicable) except when and to the extent that the transfer gives rise to an obligation that meets the definition of a liability under Public Sector GAAP. b) Tax revenue - PS 3510 was effective for fiscal years beginning on or after April 1, 2012. The City has adopted this new standard on January 1, 2013. This section establishes standards on how to account for and report tax revenue in government financial statements. c) Liability for contaminated site - PS 3260 is effective for fiscal years beginning on or after April 1, 2014. This section establishes standards for reporting a liability associated with the remediation of contaminated sites. The City has early adopted this standard effective January 1, 2013. <p>Management assessed the impact of adoption of these standards on the consolidated financial statements as summarized below:</p> <ul style="list-style-type: none"> a) Management reviewed agreements related to government transfers effective January 1, 2013 for compliance with the revised standard. Specifically, management reviewed the City's funding agreements for eligibility criteria and stipulations. It was concluded that the City's 2013 funding agreements do not contain any stipulations that give rise to an obligation that meet the definition of a liability under Public Sector GAAP. In accordance with the revised accounting standard, revenue from government transfers is recognized in the year for transfers that are authorized and all eligibility criteria have been met.

Item 1	New accounting standards adopted during the year
	<p>b) Management reviewed its existing accounting policy for recognition of tax revenue to ensure compliance with the new PS 3510. As part of this analysis, management reviewed the City's accounting treatment for tax concessions and changes in valuation allowance of tax receivable as well the presentation in the consolidated financial statements. Management determined that no adjustments were required to the measurement, classification or disclosure of tax revenues as a result of adopting this new accounting standard.</p> <p>c) A listing of contaminated or potentially contaminated sites was identified by management, in consultation with the City's real estate and asset services group, with a focus on assets no longer in productive use or assets where there may be change in the intended use that may give rise to an obligation under this new accounting standard. Based on this review, management determined that at present they do not need to recognize any liabilities associated with contaminated sites under this new accounting standard.</p>
PwC's views	<p>Through our meetings with management, we gained an understanding of the processes and analyses performed by management to ensure compliance with the new accounting standards.</p> <p>a) For government transfers, we reviewed management's analysis of the eligibility criteria and stipulations for material funding agreements and tested a sample to ensure compliance with the revenue recognition provisions contained in PS 3410. We note that the review of stipulations involves management judgment with respect to the assessment of meeting the definition of a liability under Public Sector GAAP. We have no matters to report as a result of completing these audit procedures and found management's judgments with respect to its review of stipulations to be reasonable.</p> <p>b) For tax revenue, we reviewed management's analysis and noted that the City's existing revenue recognition policy for taxation was in compliance with the provisions contained in the new accounting standard PS 3510. We have no matters to report as a result of completing these audit procedures. In addition, we note that the disclosures in the financial statements related to taxation revenue are in compliance with PS 3510.</p> <p>c) For liabilities for contaminated sites, our audit approach involved discussions with management and others within the City that has responsibility for handling matters related to contaminated sites to assess the City's process with respect to the identification of contaminated or potentially contaminated sites under the scope of this new accounting standard. We note that the review of contaminated and potentially contaminated sites involved management estimation and judgment with respect to the assets intended use in the future. We also reviewed management's assessment of contaminated or potentially contaminated sites with respect to the recognition and measurement criteria under the new standard. Where third party assessments were available, we reviewed the reports from 3rd party specialists to support management's conclusions. We found management's approach and methodology with respect to the identification of contaminated sites reasonable and are in agreement with the accounting conclusions reached.</p>

Item 2	Significant estimates and areas of management judgment
Background information	<p>There are a number of complex and significant accounting estimates that require management judgment in preparing the City's consolidated financial statements as at December 31, 2013.</p> <p>Significant provisions and estimates include:</p> <ul style="list-style-type: none"> a) provision for property tax appeals; b) provision for accounts receivable; c) employee benefit obligations; and d) landfill closure and post-closure costs for active and inactive landfill sites. <p>Management has processes and controls in place for formulating these estimates as summarized below:</p> <ul style="list-style-type: none"> a) The provision for property tax appeals is based on management's estimates of losses relating to successful appeals by taxpayers. The provision is based on historical arbitration experience as adjusted by management based on specific facts and circumstances related to open appeals at year-end. b) The provision for accounts receivable is based on management's review of individual account balances using historical collection and other relevant debtor information. c) The City engages a third party actuary to determine the liability for post-employment benefit obligations for sick leave benefits, WSIB and other post-retirement benefits. The liabilities associated with these employee benefit arrangements are calculated by the City's actuary and involve the use of significant assumptions, including but not limited to, the discount rate, salary growth, inflation and health care increases for dental, drugs and medical costs. d) Management, through the use of internal and external specialists, determines the landfill liabilities by estimating the costs to be incurred during the closure and post-closure periods. The liability is calculated using significant estimates for discount and inflation rates as well as estimates of expenditures for closure and post-closure care of the landfill sites, site capacity and remaining useful lives and the post-closure care period.
PwC's views	<p>We held discussions with management responsible for establishing these estimates to understand the key assumptions as well as validate and benchmark these judgments against our expectations as summarized below:</p> <ul style="list-style-type: none"> a) For property taxes we corresponded directly with Municipal Property Assessment Corporation (MPAC) to obtain the assessment of properties used in determining property taxation revenue for the year to assist in our validation of management's calculations. <p>We also validated the historical arbitration information on the rate of successful appeals to assess the reasonability of the estimates used by management at year-end. We compared management's "at-risk" rate used to calculate the provision to the average rate as calculated from the historical arbitration information for the</p>

Item 2	Significant estimates and areas of management judgment
	<p>past six years and found them to be comparable. We also reviewed management's adjustments to the provision for specific open appeals and found them to be reasonable.</p> <p>b) For provisions related to accounts receivable, we examined management's analysis and aging of accounts receivables at year-end and have no matters to report.</p> <p>c) For employee benefit obligations, our audit approach involves the reliance on the work of the City's actuary. In accordance with generally accepted auditing standards, we relied on the actuary for its calculation of the employee benefit liabilities and expense for the year. Our audit procedures mainly consist of reviewing the reasonableness of the data and assumptions used by the actuary and do not include a re-performance of the actuarial calculations. Accordingly, we performed the following audit procedures when relying on the work of specialists:</p> <ul style="list-style-type: none"> • Tested the participant data provided to the actuary by comparing the data to source documents maintained by the City's payroll department; • Assessed the significant actuarial assumptions (i.e. discount rates, medical cost increases, etc.) to determine that they are within a reasonable range and consistent with the provisions in the City's plans; and • Assessed that the City is in compliance with the appropriate accounting principles for the calculation, presentation and disclosure of the employee benefit obligations in the consolidated financial statements of the City. <p>We have no matters to report as a result of completing these audit procedures.</p> <p>d) For landfill liabilities, our audit approach involved the reliance on the work of the City's external environmental specialist for their calculation of the landfill liability and expense for the year. In accordance with generally accepted auditing standards, we relied on the environmental specialist for its calculation of the landfill liability and expense for the year.</p> <p>Our audit procedures mainly consist of reviewing the reasonableness of the data and assumptions used by the specialist, including benchmarking the data to prior years and obtaining explanations for significant variances and independent validation of the assumptions used for inflation and discount rates.</p> <p>We have no matters to report as a result of completing these audit procedures.</p>

Item 3	Management override of controls
Background information	<p>Canadian auditing standards require auditors to plan and perform the audit to obtain reasonable assurance that the consolidated financial statements are free of material misstatements, whether caused by error or fraud.</p> <p>The likelihood of not detecting a material misstatement resulting from fraud is higher than the likelihood of not detecting a material misstatement resulting from error, because fraud may involve collusion as well as sophisticated and carefully organized schemes designed to conceal it.</p> <p>We note that the City has developed policies and procedures to ensure appropriate segregation of duties to mitigate the risk of fraud and management override of controls.</p> <p>In addition, the City has policies in place to prevent and detect fraud, including maintaining a code of conduct (as set out in the employee handbook), Auditor General Office, processes relating to the review and approval of manual journal entries and management reviews of the divisional operating results of the City.</p>
PwC's views	<p>During our audit, we executed the following procedures in order to fulfill our responsibilities:</p> <ul style="list-style-type: none"> • Inquired of management, auditor general and legal offices and others related to any knowledge of fraud or suspected fraud; • Performed test of details primarily over revenue, including consideration of unusual or unexpected relationships; • Incorporated an element of unpredictability in the selection of the nature, timing and extent of our audit procedures; • Performed additional required procedures to address the risk of management's override of controls, including: <ul style="list-style-type: none"> ◦ examined journal entries and other adjustments for evidence of the possibility of material misstatement due to fraud; ◦ reviewed accounting estimates for biases that could result in material misstatement due to fraud; and ◦ evaluated the business rationale of significant unusual transactions. <p>As a result of completing these procedures we did not encounter any instances of fraud.</p>

3. Summary of unadjusted and adjusted items

We have concluded that the consolidated financial statements taken as a whole are free of material misstatement and (pending the completion, to our satisfaction, of the outstanding matters identified in section 1), we are prepared to issue an unqualified opinion on the financial statements.

Our responsibility is to issue an opinion as to whether the financial statements are free of material misstatement.

Under Canadian GAAS, we are required to communicate to you the unadjusted items and the effect that they may have on our opinion and to request that unadjusted items be corrected.

We did not identify any unadjusted or adjusted items during the audit.

4. *Other required communications*

Canadian GAAS requires that the external auditor communicate certain matters to the Audit Committee that may assist you in overseeing management's financial reporting and disclosure process.

Below, we summarize these required communications as they apply to you:

Matter to be communicated	PwC's response
Management's representations	<ul style="list-style-type: none"> Under Canadian GAAS, we are required to inform you of the representations we are requesting from management. A copy of the management representation letter is included in Appendix B.
Significant deficiencies in internal control	<ul style="list-style-type: none"> Recent changes to Canadian GAAS require us to communicate to the Audit Committee internal control weaknesses identified as part of our audit that are considered to be significant deficiencies. A significant deficiency is defined as an internal control deficiency that we consider merits the attention of the Audit Committee. We have none to report this year. See Appendix D of this report for our internal control recommendations that we would like to bring to the Audit Committee's attention.
Significant difficulties or disagreements that occurred during the audit	<ul style="list-style-type: none"> No difficulties or disagreements occurred while performing our audit that requires the attention of the Audit Committee.
Fraud and illegal acts	<ul style="list-style-type: none"> No fraud involving senior management, employees with a significant role in internal control or that would cause a material misstatement of the financial statements, came to our attention as a result of our audit procedures.

5. *Internal control recommendations*

The purpose of our audit was to enable us to express an opinion on the consolidated financial statements. The audit included consideration of internal control relevant to the preparation of the consolidated financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of internal control over financial reporting.

We issued a report in 2012 summarizing our internal control observations and recommendations as they related to the 2011 and 2012 audits. Most of them were remediated by management in 2013.

An update on the remediation status of these internal control observations is reported in Appendix D. No new internal control observations were identified during the 2013 audit.

6. 2013 audit fees

Our fees are in accordance with our response to the City's Request for Proposal dated October 18, 2011 covering three year contract period for the years ended December 31, 2011 through to 2013. The fee for the 2013 audit of the City's consolidated financial statements is \$89,200.

7. Upcoming changes to accounting standards

As part of our commitment to quality service, we now draw your attention to new and emerging accounting, auditing and regulatory developments on City of Greater Sudbury's financial reporting:

a. Financial instruments and financial statement presentation

Section PS 3450, Financial Instruments, will be effective for municipal governments for periods beginning on or after April 1, 2016. Early adoption is permitted. This section provides guidance on the recognition, measurement, presentation and disclosure of financial instruments. Derivatives and portfolio investments that are equity instruments quoted in an active market are measured at fair value. Other financial instruments may be elected as measured at fair value under certain conditions.

Concurrent with the adoption of Section PS 3450, organizations must adopt Section PS 1201, Financial Statement Presentation (replacing Section PS 1200) and Section PS 2601, Foreign Currency Translation (replacing PS 2600). These new standards require presentation of a new primary statement – the statement of remeasurement gains and losses – reporting various unrealized gains and losses and may also change the accounting for long-term foreign currency monetary items.

These standards will be applicable for the City in the 2017 fiscal year.

b. Other projects

Other significant projects that are in progress by the Public Sector Accounting Board:

- *Related Parties* – In September 2012, PSAB issued an exposure draft proposing a new PSA Handbook Section for Related Party Transactions. The exposure draft included guidance on the identification of related parties as well as the recognition and measurement of related party transactions. The Board considered responses to the exposure draft and issued a re-exposure draft in June 2013 with revised guidance to address concerns over key management personnel and measurement of related party transactions. PSAB amended the re-exposure draft issued in June 2013 to better reflect the different scope of the disclosure component and the recognition and measurement guidance. A re-exposure draft was issued in April 2014 that proposes standards with related party disclosures and inter-entity transactions, with a view to a final standard by the end of 2014. Our audit national public sector leader is the chair of the PSAB task force on this project.
- *Restructurings* – Restructurings may take many forms including amalgamations, transfers and reorganizations. This project aims to create a standard to define restructuring transactions and provide guidance on the recognition and measurement of assets and liabilities subject to restructuring as well as accounting for restructuring costs. A statement of principles was issued in February 2013, which proposes that restructurings involve the transfer of an integrated set of assets, liabilities and related responsibilities without the exchange of significant consideration based on the fair values of assets and liabilities transferred. Restructuring transactions are to be measured based on carrying values with limited adjustments. An exposure draft for a new standard is expected in June 2014.
- *Assets* – The objective of this project is to provide a standard that addresses the basic concepts and definition of assets, similar to the standard that already exists for liabilities (Section PS 3200). The first step in this project is a statement of principles that will define the essential characteristics of assets, contingent assets and contractual rights, provide recognition and derecognition criteria for assets and contingent assets, provide guidance on the measurement of assets and contingent assets (including impairments) and consider disclosure requirements. A draft statement of principles was issued in 2013. An exposure draft is expected to be issued in June 2014.

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- *Revenues* – This project is to develop additional principles for revenue recognition principles that apply to sources of revenue other than government transfers and tax revenue. It is a wide-reaching project seeking to address recognition, measurement and presentation of revenues that are common in the public sector. PSAB issued a statement of principles in August 2013. The statement of principles proposes a framework for addressing the accounting and reporting of many forms of public sector revenue. PSAB is deliberating comments received on its statement of principles and an exposure draft is expected to be in the developed stage in the second quarter of 2014.
 - *Asset Retirement Obligations* – This project will introduce guidance on accounting for asset retirement obligations into the PSA Handbook. The project is in early stages with a statement of principles expected before the end of 2014. A partner from our National Office sits on the PSAB task force for this project.
 - *Impairment of Non-Financial Assets* – This project will focus on addressing the impairment of tangible capital assets that provide service benefits. Deferred maintenance issues will also be considered. The project will define impairment, and provide guidance on assessment, recognition, measurement and disclosure of impairment losses. The project is in early stages with a statement of principles expected to be in the development stage at the end of 2014.

Appendix A: Draft auditor's report



June 17, 2014

Independent Auditor's Report

To the Members of Council, Inhabitants and Ratepayers of City of Greater Sudbury

We have audited the accompanying consolidated financial statements of the City of Greater Sudbury, which comprise the consolidated statement of financial position as at December 31, 2013 and the consolidated statements of operations and accumulated surplus, changes in net financial assets and cash flows for the year then ended, and the related notes, which comprise a summary of significant accounting policies and other explanatory information.

Management's responsibility for the consolidated financial statements

Management is responsible for the preparation and fair presentation of these consolidated financial statements in accordance with Canadian public sector accounting standards, and for such internal control as management determines is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's responsibility

Our responsibility is to express an opinion on these consolidated financial statements based on our audit. We conducted our audit in accordance with Canadian generally accepted auditing standards. Those standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the consolidated financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the consolidated financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the consolidated financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the consolidated financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of the consolidated financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

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**Opinion**

In our opinion, the consolidated financial statements present fairly, in all material respects, the financial position of the City of Greater Sudbury as at December 31, 2013 and the results of their operations, changes in its net financial assets and its cash flows and for the year then ended in accordance with Canadian public sector accounting standards.

Other matters

The accompanying financial statement schedules as at and for the year ended December 31, 2013 are presented as supplementary information only and are not a required part of the basic consolidated financial statements. The information in these schedules has been subject to audit procedures only to the extent necessary to express an opinion on the consolidated financial statements of the City of Greater Sudbury.

Chartered Professional Accountants, Licensed Public Accountants

Appendix B: Draft management representation letter

[Client Letterhead]

[Date]

PricewaterhouseCoopers LLP
PwC Centre
354 Davis Road, Suite 600
Oakville ON L6J 0C5

Attention: Mr. Michael Hawtin

Dear Sirs:

We are providing this letter in connection with your audit of the consolidated financial statements of the City of Greater Sudbury (the City) as at December 31, 2013 and for the year then ended (the financial statements) for the purpose of expressing an opinion as to whether such financial statements present fairly, in all material respects, the financial position, results of operations and the cash flows in accordance with Canadian public sector accounting standards.

Management's responsibilities

We have fulfilled our responsibilities, as set out in the terms of the audit engagement letter dated February 8, 2012 and addendums dated March 28, 2013 and October 7, 2013. In particular, we confirm to you that:

- We are responsible for the preparation and fair presentation of the financial statements in accordance with Canadian public sector accounting standards;
- We are responsible for designing, implementing and maintaining an effective system of internal control over financial reporting to enable the preparation and fair presentation of the financial statements that are free from material misstatement, whether due to fraud or error. In this regard, we are responsible for establishing policies and procedures that ensure financial statements are prepared in accordance with Canadian public sector accounting standards;
- We have provided you with all relevant information and access, as agreed in the terms of the audit engagement; and
- All transactions have been recorded in the accounting records and are reflected in the financial statements.

We confirm the following representations:

Preparation of financial statements

The financial statements include all disclosures necessary for fair presentation in accordance with Canadian public sector accounting standards and disclosures otherwise required to be included therein by the laws and regulations to which we are subject.

We have appropriately reconciled our books and records (e.g. general ledger accounts) underlying the financial statements to their related supporting information (e.g. sub ledger or third party data). All related reconciling items considered to be material were identified and included on the reconciliations and were appropriately adjusted in the financial statements. There were no material unreconciled differences or material general ledger suspense account items that should have been adjusted or reclassified to another account balance. There were no material general ledger suspense account items written off to a balance sheet account, which should have been written off to an operations account and vice versa. All consolidating entries have been properly recorded. All inter-governmental unit accounts

have been eliminated or appropriately measured and considered for disclosure in the financial statements.

Accounting policies

We confirm that we have reviewed our accounting policies and, having regard to the possible alternative policies, our selection and application of accounting policies and estimation techniques used for the preparation and presentation of the financial statements is appropriate in our particular circumstances to present fairly in all material respects its financial position, results of operations, and cash flows in accordance with Canadian public sector accounting standards.

Internal controls over financial reporting

We have designed disclosure controls and procedures to ensure material information relating to the City, including its consolidated subsidiaries, is made known to us by others within those entities.

We have designed internal control over financial reporting to provide reasonable assurance regarding the reliability of financial reporting and the preparation of the financial statements for external purposes in accordance with Canadian public sector accounting standards.

We have not identified any deficiency in the design or operation of disclosure controls and procedures and internal control over financial reporting identified as part of our assessment as at December 31, 2013.

Disclosure of information

We have provided you with:

- Access to all information of which we are aware that is relevant to the preparation of the financial statements, such as records, documentation and other matters including:
 - Contracts and related data;
 - Information regarding significant transactions and arrangements that are outside of the normal course of business;
 - Minutes of the meetings of Council and related committees. The most recent meetings held were City Council on May 27, 2014 and Audit Committee on May 26, 2014.
- Additional information that you have requested from us for the purpose of the audit; and
- Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence.

Completeness of transactions

All contractual arrangements entered into by us with third parties have been properly reflected in the accounting records and, where material (or potentially material) to the financial statements, have been disclosed to you. We have complied with all aspects of contractual agreements that could have a material effect on the financial statements in the event of non-compliance.

Fraud

We have disclosed to you:

- The results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud;
- All information in relation to fraud or suspected fraud of which we are aware affecting us involving management, employees who have significant roles in internal control or others where the fraud could have a material effect on the financial statements; and
- All information in relation to any allegations of fraud, or suspected fraud, affecting City's financial statements, communicated by employees, former employees or others.

Compliance with laws and regulations

We have disclosed to you all aspects of laws, regulations and contractual agreements that may affect the financial statements, including actual or suspected non-compliance with laws and regulations whose effects should be considered when preparing the financial statements.

We are not aware of any illegal or possibly illegal acts committed by the City's employees acting on the City's behalf.

Accounting estimates and fair value measurements

Significant assumptions used by us in making accounting estimates, including fair value accounting estimates, are reasonable.

For recorded or disclosed amounts in the financial statements that incorporate fair value measurements, we confirm that:

- The measurement methods are appropriate and consistently applied;
- The significant assumptions used in determining fair value measurements represent our best estimates, are reasonable and have been consistently applied;
- No subsequent event requires adjustment to the accounting estimates and disclosures included in the financial statements; and
- The significant assumptions used in determining fair value measurements are consistent with our planned courses of action. We have no plans or intentions that have not been disclosed to you, which may materially affect the recorded or disclosed fair values of assets or liabilities.

Significant estimates and measurement uncertainties known to management that are required to be disclosed in accordance with CPA Canada Public Sector Accounting Handbook Section PS 2130, Measurement Uncertainty, have been appropriately disclosed.

Related parties

We confirm the completeness of information provided to you regarding the identification of related parties as defined by Canadian Auditing Standard 550, Related Parties. We also confirm the completeness of information provided to you regarding the nature of our relationships with and transactions involving those entities.

The list of related parties summarized in note 1 of the financial statements of the City accurately and completely describes our related parties and the relationships with such parties.

Going concern

We have no plans or intentions that may materially alter the carrying value or classification of assets and liabilities reflected in the financial statements (e.g. to dispose of the entity or to cease operations).

Assets and liabilities

We have satisfactory title or control over all assets. All liens or encumbrances on the City's assets and no assets are pledged as collateral.

Receivables recorded in the financial statements represent bona fide claims against debtors for sales or other charges arising on or before the balance sheet date and are not subject to discount except for normal cash discounts. Receivables classified as current do not include any material amounts that are collectible after one year. All receivables have been appropriately reduced to their estimated net realizable value.

We have recorded or disclosed, as appropriate, all liabilities, in accordance with Canadian public sector accounting standards. All liabilities and contingencies, including those associated with guarantees, in accordance with the CPA Canada Public Sector Accounting Handbook Section PS 3300, Contingent Liabilities, have been disclosed to you and are appropriately reflected in the financial statements.

Litigation and claims

All known actual or possible litigation and claims, which existed at the statement of financial position date or exist now, have been disclosed to you and accounted for and disclosed in accordance with Canadian public sector accounting standards, whether or not they have been discussed with legal counsel.

Misstatements detected during the audit

Certain representations in this letter are described as being limited to those matters that are material. Items are also considered material, regardless of size, if they involve an omission or misstatement of accounting information that, in light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would have been changed or influenced by the omission or misstatement.

We confirm that the consolidated financial statements are free of material misstatements, including omissions.

We confirm that we are not aware of any uncorrected misstatements. There is no adjusted misstatement identified during your audit.

Events after consolidated balance sheet date

We have identified all events that occurred between the statement of financial position date and the date of this letter that may require adjustment of, or disclosure in, the financial statements, and have effected such adjustment or disclosure.

Cash and banks

The books and records properly reflect and record all transactions affecting cash funds, bank accounts and bank indebtedness of the City.

All cash balances are under the control of the City, free from assignment or other charges, and unrestricted as to use, except as disclosed to you.

The amount shown for cash on hand or in bank accounts excludes trust or other amounts, which are not the property of the City.

All cash and bank accounts and all other properties and assets of the City of which we are aware are included in the financial statements as at December 31, 2013.

Restricted assets and revenues

All assets and revenues subject to restrictions are disclosed in the financial statements.

All externally restricted inflows have been recognized as revenue in the year in which the resources were used for the purposes specified. All externally restricted inflows received before this criterion has been met have been reported as liabilities until the resources are used for the purposes specified.

Accounts receivable

All amounts receivable by the City were recorded in the books and records.

Amounts receivable amounted to \$41.5 million and are considered to be fully collectible, except to the extent of \$1.5 million, in respect of which, a full allowance has been made in the accounts.

All receivables were free from hypothecation or assignment as security for advances to the City.

Receivables recorded in the financial statements represent bona fide claims against debtors' charges arising on or before the statement of financial position date. Receivables classified as current do not include any material amounts that are collectible after one year. All receivables have been appropriately reduced to their estimated net realizable value.

Financial assets (other than loans and receivables)

All securities which were owned by the City were recorded in the accounts.

All income earned on the financial assets has been recorded in the accounts, and any interest income has been accrued using the effective interest rate method.

We are not aware of any objective evidence of impairment that would result in the recognition of an impairment loss on any financial asset.

You have been informed of the acquisition of or the formation of all government units, business enterprises, partnerships, joint ventures or other participations during the year.

All transactions with governmental units, business enterprises, partnerships or joint ventures have been recorded in the accounts presented to you. All investments in and advances to governmental units, business enterprises, partnerships, joint ventures or other participations are appropriately recorded, and there is no evidence of impairment in value below the resulting balances shown in the financial statements.

There has been no activity in any dormant or inactive government units, business enterprises, partnerships, joint ventures or other participations, except as disclosed to you.

The modified equity method is used to account for the City's investment in the following government business enterprises; Sudbury Airport Community Development Corporation and Greater Sudbury Utilities Inc.

Tangible capital assets

All charges to tangible capital asset accounts represented the actual cost of additions to tangible capital assets.

All contributed tangible capital assets have been recorded at fair value at the date of the contribution.

No significant tangible capital asset additions were charged to repairs and maintenance or other expense accounts.

Book values of tangible capital assets sold, destroyed, abandoned or otherwise disposed of have been eliminated from the accounts.

Tangible capital assets owned by the City are being depreciated on a systematic basis over their estimated useful lives, and the provision for depreciation was calculated on a basis consistent with that of the previous date.

All lease agreements covering assets leased by or from the City have been disclosed to you and classified as leased tangible capital assets or operating leases.

Leased tangible capital assets are being amortized on a systematic basis over the period of expected use.

There have been no events, conditions or changes in circumstances that indicate that a tangible capital asset no longer contributes to the City's ability to provide goods and services, or that the value of future economic benefits associated with the tangible capital asset is less than its net book value. We believe that the carrying amount of the City's long-lived tangible capital assets is fully recoverable in accordance with CPA Canada Public Sector Accounting Handbook PS 3150.

We have reviewed our records and have recorded an appropriate value for all tangible capital assets (TCA) owned by the City. We believe all TCA's to which the future benefit accrues to the City are appropriately accounted for.

Long-term debt

All borrowings and financial obligations of the City of which we are aware are included in the financial statements as at December 31, 2013, as appropriate. We have fully disclosed to you all borrowing arrangements of which we are aware.

Deferred revenue

All material amounts of deferred revenue meet the definition of a liability and were appropriately recorded in the books and records.

Retirement benefits, post-employment benefits, compensated absences and termination benefits

All arrangements to provide retirement benefits, post-employment benefits, compensated absences and termination benefits have been identified to you and have been included in the actuarial valuation as required.

The details of all retirement benefits, post-employment benefits, compensated absences and termination benefits amendments since December 31, 2012, the date of the last actuarial valuation, have been identified to you.

The actuarial valuation dated December 31, 2012 incorporates management's best estimates, detailed as follows:

- a) The actuarial assumptions and methods used to measure liabilities and costs for financial accounting purposes for all post-retirement benefits are appropriate in the circumstances.
- b) The City does not plan to make frequent amendments to the post-retirement benefit plans.

All changes to the plan and the employee group and the fund's performance since the last actuarial valuation have been reviewed and considered in determining the post-retirement expense.

The City's actuaries have been provided with all information required to complete their valuation as at December 31, 2012 and where applicable, their extrapolation to December 31, 2013.

We confirm that the extrapolations are accurate and include the proper reflection of the effects of changes and events occurring subsequent to the most recent valuation that had a material effect on the extrapolation.

The employee future benefit costs, assets and obligations have been determined, accounted for and disclosed in accordance with CPA Canada Public Sector Accounting Handbook PS 3250, Retirement Benefits and CPA Canada Public Sector Accounting Handbook PS 3255, Post-employment Benefits, Compensated Absences and Termination Benefits. In particular:

- a) The significant accounting policies that the City has adopted in applying CPA Canada Public Sector Accounting Handbook Section PS 3250 and CPA Canada Public Sector Accounting Handbook Section PS 3255 are accurately and completely disclosed in the notes to the financial statements.
- b) Each of the best estimate assumptions used reflects management's judgment of the most likely outcomes of future events.
- c) The best estimate assumptions used are, as a whole, internally consistent, and consistent with the asset valuation method adopted.
- d) The discount rate used to determine the accrued benefit obligation was determined by reference to the City's borrowing rate, at the measurement date on high-quality debt instruments with cash flows that match the timing and amount of expected benefit payments; or inherent in the amount at which the accrued benefit obligation could be settled.
- e) The assumptions included in the actuarial valuation are those that management instructed Mercer to use in computing amounts to be used by management in determining Post-employment Benefits, Compensated Absences and Termination Benefits and in making required disclosures in the above-named financial statements, in accordance with CPA Canada Public Sector Accounting Handbook Section PS 3250.
- f) In arriving at these assumptions, management has obtained the advice of a consulting actuary who assisted in reaching best estimates, but has retained the final responsibility for them.
- g) The source data and plan provisions provided to the actuary for preparation of the actuarial valuation are accurate and complete.
- h) The disclosure of the City's share of the risks and benefits under joint defined benefit plans, the total financial status of any joint plans, significant policies and a description of the unique nature and terms of any joint plans are accurate and complete.
- i) All changes to plan provisions or events occurring subsequent to the date of the actuarial valuation and up to the date of this letter have been considered in the determination of benefit costs and obligations and as such have been communicated to you as well as to the actuary.

Statements of operations and net financial assets

All transactions entered into by the City have been recorded in the books and records presented to you.

All amounts have been appropriately classified within the statements of operations and net financial assets.

The accounting principles and policies followed throughout the year were consistent with prior period practices (except as disclosed in the financial statements).

We provided you a complete listing of government transfer agreements as part of our assessment on the impact of adopting CPA Canada Public Sector Accounting Handbook Section PS 3410, Government Transfers.

Government transfers

Transfers without eligibility criteria or stipulations have been recognized as revenue once the transfer has been authorized.

Transfers with eligibility criteria but without stipulations have been recognized as revenue once the transfer has been authorized and all eligibility criteria have been met.

Transfers with or without eligibility criteria but with stipulations have been recognized as revenue in the year the transfer has been authorized and all eligibility criteria have been met, except when, and to the extent that, the transfer gives rise to an obligation that meets the definition of a liability for the recipient government in accordance with CPA Canada Public Sector Accounting Handbook PS 3200, Liabilities.

Environmental matters

There are no liabilities or contingencies arising from environmental matters that have not already been disclosed to the auditor. As part of adopting CPA Canada Public Sector Accounting Handbook Section PS 3260, Liability for Contaminated Sites, effective January 1, 2013, we provided you a listing of all locations which we believe are in the scope of this accounting standard.

Liabilities or contingencies related to environmental matters have been recognized, measured and disclosed, as appropriate, in the financial statements.

We have considered the effect of environmental matters and the carrying value of the relevant assets is recognized, measured and disclosed, as appropriate, in the financial statements.

All material commitments related to environmental matters have been measured and disclosed, as appropriate in the financial statements and, with respect to contaminated sites, have been measured and disclosed in accordance with CPA Canada Public Sector Accounting Handbook Section PS 3260.

Use of a specialist

We assume responsibility for the findings of other specialists in evaluating the employee benefit obligation and landfill closure and post-closure liabilities and have adequately considered the qualifications of the specialists in determining the amounts and disclosures used in the financial statements and underlying accounting records. We did not give or cause any instructions to be given to specialists with respect to the values or amounts derived in an attempt to bias their work, and we are not otherwise aware of any matters that have had an impact on the independence or objectivity of the specialists.

Minutes

All matters requiring disclosure to or approval by City Council has been brought before them at appropriate meetings and are reflected in the minutes.

General

There are no proposals, arrangements or actions completed, in process, or contemplated that would result in the suspension or termination of any material part of the City's operations.

Information relative to any matters handled on behalf of the City by any legal counsel, including all correspondence and other files, has been made available to you.

Segment disclosures

Pursuant to CPA Canada Public Sector Accounting Handbook PS 2700, Segment Disclosures, in identifying segments, management has considered the definition of a segment and other factors, including:

- the objectives of disclosing financial information by segment;
- the expectations of members of the community and their elected or appointed representatives regarding the key activities and accountabilities of the government;
- the qualitative characteristics of financial reporting as set out in CPA Canada Public Sector Accounting Handbook PS 1000, Financial Statement Concepts;
- the homogeneous nature of the activities, service delivery, or recipients of the services;
- whether the activities relate to the achievement of common outcomes or services as reflected in government performance reports and plans;
- whether discrete financial information is reported or available; and
- the nature of the relationship between the government and its organizations (within the reporting entity).

Management has identified following operating segments: General government, Transportation Services, Protection Services, Environmental Services, Health and Social Services, Recreation and cultural services and Planning and development Services.

The financial statements disclose all the relevant factors used to identify the City's reportable segments.

There has been no change in accounting policies related specifically to segment reporting.

Events after the balance sheet date

We have identified all events that occurred between the statement of financial position date and the date of this letter that may require adjustment of, or disclosure in, the financial statements, and have effected such adjustment or disclosure.

Yours truly,

City of Greater Sudbury

DRAFT

Doug Nadorozny, Chief Administration Officer

Lorella Hayes, Chief Financial Officer/ Treasurer

Appendix C: Independence letter



June 3, 2014

Members of the Audit Committee
City of Greater Sudbury
200 Brady Street
Sudbury ON P3A 5P3

Dear Members of the Audit Committee:

We have been engaged to audit the consolidated financial statements of the City of Greater Sudbury (the City) for the year ended December 31, 2013.

Canadian generally accepted auditing standards require that we communicate at least annually with you regarding all relationships between the City, its management and us that may reasonably be thought to bear on our independence.

In determining which relationships to report, these standards require us to consider relevant rules and related interpretations prescribed by the Chartered Professional Accountants of Ontario and applicable legislation covering such matters as:

- a. holding a financial interest, either directly or indirectly, in a client;
- b. serving as an officer or director of a client;
- c. performance of management functions for an assurance client;
- d. personal or business relationships of immediate family, close relatives, partners or retired partners, either directly or indirectly, with a client or its management;
- e. economic dependence on a client;
- f. long association of senior personnel with a listed entity audit client;
- g. audit committee approval of services to a listed entity audit client; and
- h. provision of services in addition to the audit engagement.

We have prepared the following comments to facilitate our discussion with you regarding independence matters arising since June 6, 2013, the date of our last letter.

We are not aware of any relationships between the City or its management and PricewaterhouseCoopers LLP that may reasonably be thought to bear on our independence that have occurred from June 6, 2013 to June 3, 2014.

We hereby confirm that we are independent with respect to the City within the meaning of the Rules of Professional Conduct of the Chartered Professional Accountants of Ontario as of June 3, 2014.

PricewaterhouseCoopers LLP
PwC Centre, 354 Davis Road, Suite 600, Oakville, Ontario, Canada L6J 0C5
T: +1 905 815 6300, F: +1 905 815 6499, www.pwc.com/ca

PwC refers to PricewaterhouseCoopers LLP, an Ontario limited liability partnership.



This report is intended solely for the use of the Audit Committee, Council, management and others within the City and should not be used for any other purpose.

We look forward to discussing with you the matters addressed in this letter at our upcoming meeting on June 17, 2014.

Yours very truly,

PricewaterhouseCoopers LLP

Chartered Professional Accountants

Appendix D: Internal control recommendations

Internal Control Recommendations

City of Greater Sudbury

*Year ended
December 31, 2013*





June 3, 2014

Ms. Lorella Hayes
Chief Financial Officer /Treasurer
City of Greater Sudbury
200 Brady Street
Sudbury ON P3A 5P3

Dear Ms. Hayes:

**Management Letter
2013 Audit of the City of Greater Sudbury**

We have substantially completed our audit examination of the consolidated financial statements of the City of Greater Sudbury (the City). Our audit was directed at providing the basis for our opinion on the consolidated financial statements for the year ended December 31, 2013. In prior years, we had noted several areas where we believed that controls and procedures could be improved and accordingly we had provided management with recommendations designed to address those matters. We summarize the remediation status in the appendix attached to this letter.

Our examination was designed in accordance with Canadian generally accepted auditing standards to enable us to express an opinion on the consolidated financial statements as a whole and our work involved evaluating only those systems and internal controls in your organization upon which we intend to rely. The objective of an audit is to obtain reasonable assurance whether the consolidated financial statements are free of material misstatement. Therefore, this memorandum does not necessarily include all matters that may be of interest to management, which a more extensive or special internal controls examination might develop. It is not designed to identify and cannot necessarily be expected to uncover fraud, defalcations and other irregularities.

The responsibility for the maintenance of an adequate system of internal control, as well as for the prevention and detection of irregularities rests with management.

This communication is prepared solely for the information of management and is not intended for any other purpose. We accept no responsibility to a third party who uses this communication.

*PricewaterhouseCoopers LLP
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T: +1 905 815 6300, F: +1 905 815 6499, www.pwc.com/ca*

PwC refers to PricewaterhouseCoopers LLP, an Ontario limited liability partnership.



We would like to take this opportunity to thank the management and staff of City of Greater Sudbury for the co-operation that we received during the course of our audit. Please do not hesitate to contact us if there are any matters in this letter that you would like to discuss further.

Yours truly,

PricewaterhouseCoopers LLP

Michael Hawtin
Partner
Audit and Assurance Group

Encl.

Contents

The following tables summarize the status of the 9 Information Technology Internal Control Recommendations (ICR) reported in 2012 with their status based on our observations in 2013. For ICRs which were not remediated in 2013, we have summarized the progress made by management.

ICR remediated

Information Technology Internal Control Recommendations	Status Update
High Risk	
1. User termination	Remediated
2. Access to new users	Remediated
3. Access to production servers	Remediated
4. Local server password setting	Remediated
5. Use of generic super user access	Remediated
6. Change management process	Remediated
Medium Risk	
7. Audit logging at the local server (Operating System) level	Observation related to PeopleSoft Financial system was remediated in 2012. Remediation for PeopleSoft HR system was completed in 2013.
Low Risk	
8. Password configurations within the Database	Remediated

ICR not yet remediated

Low Risk	
9. Formal policies and procedures re: logical security, change management and IT operations processes.	Remediation in progress

Low Risk

Formal policies and procedures re: logical security, change management and IT operations processes

Observation

It was noted during our examination of the City's information technology policies and procedures that logical security policies and incident management policies were drafted; however these policies are not yet finalized and are subject to management review and approval. We also note that there was no change management policy document.

Impact

There is a risk that the policies and procedures in this area cannot be implemented and enforced as they are not approved by the appropriate level of management.

Recommendation

We recommend management approve the policies and procedures for logical security, change management and IT operations processes.

Management's response

The IT division has developed these policies, which are in draft form and currently being reviewed. The City's legal division is reviewing the proposed policies. Once completed, the policies will be submitted to Human Resources, and then the Senior Management Team for review and approval.

