

**Subject: Light Rail Regulatory Monitor and Compliance Officer Annual Report
for 2025**

File Number: ACS2026-CMR-OCM-0001

Report to Transit Committee 9 April 2026

and Council on 22 April 2026

**Submitted on March 27, 2026 by Sam Berrada, Light Rail Regulatory Monitor and
Compliance Officer and Wendy Stephanson, City Manager**

**Contact Person: Sam Berrada, Light Rail Regulatory Monitor and Compliance
Officer**

514-928-9799, sabvanguard@gmail.com

Ward: City Wide (0)

**Objet : Rapport annuel de l'agent de surveillance et de conformité
réglementaires du train léger pour 2025**

Numéro du dossier : ACS2026-CMR-OCM-0001

Rapport présenté au Comité du transport en commun

le 9 avril 2026

et au Conseil municipal le 22 avril 2025

**Déposé le 27 mars 2026 par Sam Berrada, agent de surveillance et de conformité
réglementaires du train léger, et Wendy Stephanson, directrice municipale**

**Personne-ressource : Sam Berrada, agent de surveillance et de conformité
réglementaires du train léger**

514-928-9799, SABVanguard@gmail.com

Quartier : À l'échelle de la ville (0)

REPORT RECOMMENDATION(S)

That the Transit Committee recommend Council receive the Light Rail Regulatory Monitor and Compliance Officer Annual Report, attached as Document 1.

RECOMMANDATION(S) DU RAPPORT

Que le Comité du transport en commun recommande au Conseil municipal de prendre connaissance du Rapport annuel de l'agent de surveillance et de conformité réglementaires (ASCR) du train léger, reproduit ci-joint dans la pièce 1.

BACKGROUND

On July 14, 2011, Council approved the implementation plan for the Ottawa Light-Rail Transit (LRT) project (ACS2011-ICS-RIO-0002). At that time, the City of Ottawa and Transport Canada had been working together on the regulatory regime for the City to regulate its light rail system. As a result of those discussions, Council also authorized the City to finalize a regulatory agreement with the federal government.

The Transport Canada Delegation Agreement, effective October 1, 2011, established a delegated regulation model for the development, adoption, monitoring and enforcement of City rail transit regulations. Under this model, the Regulatory Monitor and Compliance Officer is responsible for monitoring and reporting on compliance with the LRT regulations.

On September 23, 2015, Council approved the governance and reporting requirements for the Regulatory Monitor and Compliance Officer ([ACS2015-CMR-OCM-0018](#)). This report provided that the Regulatory Monitor and Compliance Officer would submit a multi-year initial work plan to Council for approval three months prior to revenue service. At its meeting of February 28, 2018, Council approved Motion No. 65/6 appointing Sam Berrada (SAB Vanguard Consulting Inc.) as the Regulatory Monitor and Compliance Officer.

Council approved the Regulatory Monitor and Compliance Officer's initial work plan ([ACS2018-CCS-OCC-0017](#)) on September 12, 2018. Council has received six annual reports from the Regulatory Monitor and Compliance Officer:

- February 26, 2020 ([ACS2020-OCC-TRA-0002](#))

- April 14, 2021 ([ACS2021-OCC-GEN-0009](#))
- April 13, 2022 ([ACS2022-OCC-GEN-0008](#))
- April 26, 2023 ([ACS2023-OCC-GEN-0001](#))
- April 17, 2024 ([ACS2024-OCC-GEN-0006](#))
- April 16, 2025 ([ACS2025- CMR-OCM-0002](#))

DISCUSSION

The Regulatory Monitor and Compliance Officer prepared the seventh annual compliance report, presented for the Transit Committee and Council’s receipt, as set out in Document 1. This is consistent with the mandate approved by Council in 2018 and re-confirmed through the [Light Rail Regulatory Monitor Compliance Officer Contract report](#) in April 2023. In accordance with the Regulatory Monitor and Compliance Officer’s mandate, regulatory compliance monitoring activities started during the fourth quarter of 2019, shortly after revenue service inception of O-Train Line 1.

In accordance with the mandate provided by the City, the Regulatory Monitor and Compliance Officer selected and conducted monitoring activities throughout 2025 by reviewing the following key areas:

- Traction power supply system – Inspections and maintenance
- Communications systems – Inspections and maintenance

The first area was selected given the fundamental role the traction power supply system plays in the operation of the Confederation Line and the significant impact on safety, security, and service. There are 10 traction power sub stations on the Confederation Line (excluding the East Extension) that supply electrical power to the light rail vehicles.

The second area, communications systems, was selected given the important role it plays in the safe and reliable service of the Confederation Line and the potential impact on safety, security and service. The “Communications Based Train Control” was not part of the 2025 monitoring of communications systems as it was previously monitored by the RMCO in 2023.

The traction power supply system and communications systems had not previously been monitored by the Regulatory Monitor and Compliance Officer following the start of revenue service availability.

The Regulatory Monitor and Compliance Officer’s seventh annual compliance report describes the specific areas that were monitored, including the work undertaken to verify compliance with LRT regulations and related requirements, as well as the compliance assessment findings for each area monitored.

As indicated in the annual compliance report, the City’s LRT Regulations are comprised of City plans, programs, standards, practices and other requirements (“City

requirements”) relating to O-Train Line 1, the Confederation Line that have been adopted and imposed by the City through various means.

The compliance assessment involves the Regulatory Monitor and Compliance Officer reviewing:

- City requirements
- Related documentation from applicable City departments and contractors
- Practices and procedures followed by the people required to perform the services, tasks and activities related to the City requirement

MANAGEMENT RESPONSE

The City received the compliance report submitted by the Regulatory Monitor and Compliance Officer. The Regulatory Monitor and Compliance Officer examined five elements related to the traction power supply system, and six elements related to communications systems.

For both areas monitored, OC Transpo was found to be fully compliant relative to its regulatory responsibilities, while Rideau Transit Maintenance (RTM) and its subcontractors achieved a high level of conformance and execution for inspections and maintenance of these systems. Regulatory compliance monitoring activities and findings are summarized in Sections 5 and 6 of Document 1.

The Regulatory Monitor and Compliance Officer provides findings to the City of Ottawa and OC Transpo according to the following criteria:

- Compliant: Monitoring activities identified compliant results in accordance with City requirements, as reflected in the related documents
- Mostly compliant: Monitoring activities identified predominantly compliant results, with some exceptions
- Partially compliant: Monitoring activities identified mixed results, with some compliant areas and some non-compliant areas
- Not compliant: Monitoring activities identified either fully non-compliant results or mostly non-compliant results
- Opportunity: Monitoring activities identified an opportunity for improvement relative to City requirements and Good Industry Practice

A similar scale is used for contractors with the term conformant rather than compliant since such findings relate to contractual requirements (i.e. Project Agreement) rather than City LRT Regulations.

Traction power supply system

OC Transpo was evaluated on five elements related to its regulatory responsibilities for inspections and maintenance of the traction power supply system and was found to be compliant with all elements.

During the verification of records, the Regulatory Monitor Compliance Officer identified an opportunity for OC Transpo to strengthen record keeping of oversight activities by using CleverCAD, a software application, rather than Excel, to align with the Oversight Schedule. The Regulatory Monitor Compliance Officer noted that this does not represent a compliance issue with respect to OC Transpo's regulatory responsibilities, as oversight and record maintenance requirements are being met based on the objective evidence provided. OC Transpo is updating documentation to reflect that inspections may be documented using either the CleverCAD system, or dedicated tracking spreadsheets.

Rideau Transit Maintenance was evaluated on six elements and was found to be conformant with four elements, and mostly conformant with two.

Communications systems

OC Transpo was evaluated and five elements related to its regulatory responsibilities for inspections and maintenance of communications systems and was found to be fully compliant. The Regulatory Monitor and Compliance Officer noted that Communications-Based Train Control (CBTC) was not included in the 2025 monitoring activities because it had already been assessed in the 2023 annual compliance report, which found that while not all commuter rail systems use CBTC, the City's investment in the technology for the O-Train Confederation Line provides significant safety and reliability benefits.

The Regulatory Monitor Compliance Officer identified two opportunities related to OC Transpo's oversight record keeping and internal oversight processes. Oversight records for the quarterly review of records were entered into CleverCAD several months after monitoring occurred, and OC Transpo is updating and implementing formal guidance requiring staff to record oversight activities in CleverCAD within 30 days. In addition, following a December 2023 contract variation assigning RTM responsibility for inspecting and maintaining Guideway Intrusion Detection System (GIDS) devices outside the downtown tunnel, evidence indicated inspections were conducted using inconsistent frequency and procedures. OC Transpo is reviewing its internal oversight processes related to contract variation.

Rideau Transit Maintenance was evaluated on six elements and was found to be conformant with three elements, and mostly conformant with three.

REMEDIAL ACTIONS

City staff will continue to oversee RTM's progress toward full conformance through established oversight and contract administration mechanisms under the Project Agreement. OC Transpo has formally requested corrective action plans for each of the findings with associated timelines. A detailed list of remedial actions has been prepared to support timely followup and will be reviewed at regular meetings with the Regulatory Monitor and Compliance Officer, RTM, Alstom, and City staff.

FINANCIAL IMPLICATIONS

There is no financial implication to receiving this report for information.

LEGAL IMPLICATIONS

There are no legal impediments to receiving this report for information.

COMMENTS BY THE WARD COUNCILLOR(S)

This is a city-wide report

CONSULTATION

Consultation was not required for this report.

ACCESSIBILITY IMPACTS

No specific accessibility impacts have been identified in the preparation of this report.

DELEGATION OF AUTHORITY IMPLICATIONS

No additional delegated authority is being sought by staff as part of this report.

ASSET MANAGEMENT IMPLICATIONS

Activities of the Regulatory Monitor and Compliance Officer support comprehensive asset management by review of process, assets and oversight.

ECONOMIC IMPLICATIONS

No specific economic implications have been identified in the preparation of this report.

RISK MANAGEMENT IMPLICATIONS

Risk implications of the Light Rail Regulatory Framework have been identified and explained in previous reports and are being managed by appropriate staff.

RURAL IMPLICATIONS

No specific rural implications have been identified in the preparation of this report.

TECHNOLOGY IMPLICATIONS

No specific technology implications have been identified in the preparation of this report.

TERM OF COUNCIL PRIORITIES

The 2023-2026 Term of Council priorities include:

- A city that is more connected with reliable, safe, and accessible mobility options.
- A city that it is green and resilient.

SUPPORTING DOCUMENTATION

Document 1: Regulatory Monitor and Compliance Officer Annual Compliance Report for 2025.

DISPOSITION

The Light Rail Regulatory Monitor and Compliance Officer will proceed according to Council direction.