



Office of the
Saskatchewan Information
and Privacy Commissioner

REVIEW REPORT 256-2025

City of Prince Albert

January 29, 2026

Summary: The Applicant submitted the prescribed *Access to Information Request Form* to the City of Prince Albert (City). The City issued a fee estimate to the Applicant in the amount of \$355.00. The Applicant requested a review of the fee estimate by the Office of the Saskatchewan Information and Privacy Commissioner. The City then provided the Applicant with a revised fee estimate in the amount of \$160.00, but the Applicant was not satisfied and chose to continue with a review of the revised fee estimate.

The Commissioner found that the overall revised fee estimate of \$160.00 issued by the City was *more than* reasonable. The Commissioner recommended that if the Applicant chooses to pay the 50% deposit of \$80.00, the City may continue to process the access to information request.

I BACKGROUND

[1] On September 17, 2025, the City of Prince Albert (City) received the prescribed *Access to Information Request Form* from the Applicant.¹ The Applicant requested the following:

Personal information that identifies [Applicant], Including emails and hard copys which relates to health, operations sop's [Standard Operating Procedure], performance, aspects of personal file and any other file s from City Hall departments to WWTP [Waste Water Treatment Plant].²

¹ The Access to Information Request Form is prescribed by the regulations: *The Local Authority Freedom of Information and Protection of Privacy Regulations*, c.L-27.1 Reg1 (July 1, 1993), as amended. An applicant may use Form A as found in Part III of the Regulations.

² The use of square brackets in this Report reflects the efforts of this office to preserve the identity of the Applicant and other individuals and to clarify acronyms or shortforms quoted by others.

[2] The Applicant paid the \$20.00 application fee on September 18, 2025. The City emailed the Applicant on September 18, 2025, to confirm receipt of the *Access to Information Request* form and the \$20.00 payment.³

[3] On September 23, 2025, the City and the Applicant corresponded via email to clarify the timeframe of records being requested. In the email exchange with the City, the Applicant advised they were requesting access to records from April 22, 2025 to September 22, 2025, inclusive.

[4] On October 1, 2025, the City emailed a \$355.00 fee estimate to the Applicant advising that a deposit of 50% (\$177.50) was required to proceed with processing the access to information request.

[5] On October 9, 2025, the Applicant requested a review of the fee estimate by the Office of the Saskatchewan Information and Privacy Commissioner (OIPC).⁴

[6] On November 5, 2025, OIPC notified the City and the Applicant that a review of the fee estimate would commence. In the notification to the City, OIPC requested the following by December 5, 2025:

- An explanation of the calculation of the fee estimate (for paper and electronic records), and the reasonableness of the fee;
- Actions taken to reduce costs for the Applicant; and
- Advise if the Applicant was provided an adjusted fee or charged a different final fee and how this fee was arrived at.

[7] The Applicant was also notified of the review and invited to provide a submission by December 5, 2025.

³ Section 5(1) of the regulations as set out in footnote 1, prescribes the \$20 application fee.

⁴ *Supra*, footnote 1. An Applicant may use Form B as found in Part III of the *Regulations*.

- [8] On December 4, 2025, the City emailed a revised fee estimate of \$160.00 to the Applicant and advised that a deposit of 50% (\$80.00) was required to proceed with processing the access to information request. OIPC was copied in this correspondence.
- [9] On December 5, 2025, OIPC followed up with the Applicant to assess if they were satisfied with the revised fee estimate. On the same day, the Applicant responded that they were not satisfied and wished to continue with the review. On the same day, OIPC advised the Applicant and the City that the review would continue but that it would focus exclusively on the revised fee estimate. OIPC requested the City provide a submission addressing the revised fee estimate by December 10, 2025.
- [10] On December 10, 2025, the City provided a submission to OIPC. The City did not provide permission to share the submission with the Applicant. The Applicant did not provide a submission to OIPC.

II RECORDS AT ISSUE

- [11] At issue is the revised fee estimate issued by the City. There are no records at issue in this review.

III DISCUSSION OF THE ISSUES

1. Jurisdiction

- [12] The City qualifies as a “local authority” under section 2(1)(f)(i) of *The Local Authority Freedom of Information and Protection of Privacy Act (LA FOIP)*.⁵ OIPC has jurisdiction to undertake a review of this matter, under Part VI of *LA FOIP*.

⁵ *The Local Authority Freedom of Information and Protection of Privacy Act*, SS 1990-91, c.L-27.1, as amended.

2. Was the fee estimate issued by the City reasonable?

[13] Sections 9(1) and (2) of *LA FOIP* provide as follows:

9(1) An applicant who is given notice pursuant to clause 7(2)(a) is entitled to obtain access to the record on payment of the prescribed fee.

(2) Where the amount of fees to be paid by an applicant for access to records is greater than a prescribed amount, the head shall give the applicant a reasonable estimate of the amount, and the applicant shall not be required to pay an amount greater than the estimated amount.

[14] Section 9(2) of *LA FOIP* requires a local authority to provide a fee estimate if the cost for providing access will be more than \$100 by way of section 6(1) of *The Local Authority Freedom of Information and Protection of Privacy Regulations (LA FOIP Regulations)*.⁶

[15] A “reasonable fee estimate” is one that is proportionate to the work required by the local authority to respond effectively and efficiently to an access to information request. A fee estimate is “equitable” when it is fair and even-handed and supports the principle that applicants should bear a reasonable portion of the costs to produce the records they are seeking. They should not bear costs arising from administrative inefficiencies or poor records management. When it comes to fees, the three types that are a consideration in this review include:⁷

- (1) Fees for searching for records;
- (2) Fees for preparing the records for disclosure; and
- (3) Fees for reproducing the records.

[16] In its submission, the City explained that it ultimately identified approximately 251 responsive records but only charged for the costs associated with identifying and preparing

⁶ *Supra*, footnote 1.

⁷ OIPC [Review Report 127-2025](#) at paragraph [18].

147 records for release because this was the number of records cited in the original fee estimate. The City calculated the revised fee estimate as follows:

Type of Fee	Calculation of Fees	Total Amount of Fees
1 Time required to search for records	2 hours x \$30/hour	\$60.00
2 Time required to prepare records for disclosure	4 hours x \$30/hour (approximately 147 pages x 2 minutes/page = 294 minutes/60 minutes = 4.9 hours – rounded down to 4 hours)	\$120.00
3 USB Stick *No charge if a USB is provided	1 x \$10.00	\$10.00
4 LESS:	Minus 1 hour	(\$30.00)
Total amount of fees required to process access request		\$160.00
50%		\$80.00

(1) Reasonableness of the Fees for Searching

[17] Section 5(3) of the *LA FOIP Regulations* describes the fee formula local authorities can apply when estimating a fee for searching or preparing responsive records. A local authority can charge \$15.00 for every 30 minutes of search or preparation time in excess of one hour. In other words, the first hour is free. Section 5(3) of *LA FOIP Regulations* provides as follows:

5(3) Where time in excess of one hour is spent in searching for a record requested by an applicant or in preparing it for disclosure, a fee of \$15 for each half-hour or portion of a half-hour of that excess time is payable at the time when access is given.

[18] OIPC has previously outlined the following guidance with respect to what can be included in the calculation of search time:⁸

⁸ *Ibid*, at paragraph [21].

Fees for search time consist of every half hour of manual search time required to locate and identify responsive records. For example:

- Staff time involved with searching for records.
- Examining file indices, file plans or listings of recordings either paper or electronic.
- Pulling paper files/specific paper records out of files.
- Reading through files to determine whether records are responsive.

Search time *does not* include:

- Time spent to copy the records.
- Time spent going from office to office or off-site storage to look for records.
- Having someone review the results of the search.

[19] The City explained in its submission that the Applicant originally requested responsive records from all City departments. However, much later into this process the Applicant conceded they were only interested in records from only four departments.

[20] The following table outlines the anticipated results of the search of the four departments:

Division/Department	Number of Pages	Electronic Locations	Physical Locations
Public Works	51	Yes	None
Public Works	20-30	Yes	None
Public Works	18	Yes	None
Human Resources	20	Yes	None
Human Resources	14	Yes	None
Human Resources	30	Yes	1 Cabinet

Human Resources	75	None	1 File
Community Development	10	Yes	None
Community Development	5	Yes	1 Cabinet
City Manager's Office	8	Yes	None
Totals	251 (approx.)	22 electronic locations	3 physical locations

In the table above, the City used two (2) search parameters for each electronic location:

- [Applicant's first name]
- [Applicant's last name]

Additional Notes:

- 36 minutes of video footage to be severed/redacted
- Ticket Tracer is a program used for managing and tracking various types of tickets

[21] In addition, the City provided the following additional details in terms of the key words used and locations searched which aligns with its “Appendix C” reproduced above:

Public Works Department

- 2 search parameters [Applicant's first and last name] x 8 electronic locations = 48 mins

Human Resources Department

- 2 search parameters [Applicant's first and last name] x 6 electronic locations = 36 mins
- 1 physical location (cabinet) = 5 mins

Community Development Department

- 2 search parameters [Applicant's first and last name] x 5 electronic locations = 30 mins

- 1 physical location (cabinet) = 5 mins

City Manager's Office

- 2 search parameters [Applicant's first and last name] x 3 electronic locations = 18 mins

Additional Notes:

- No charge was applied for reviewing files to determine responsiveness, as the request relates to the Applicant's personal information and is very broad
- No charge was applied for accessing the Applicant's personnel file

[22] OIPC sought clarification from the City why it indicated there were likely no paper records in some of the physical locations. On January 9, 2026, the City responded as follows:

...All departments manage paper records to some extent. While some departments rely more heavily on electronic systems, each department maintains paper records of some kind. Records related to the Applicant's request are stored differently across departments based on factors such as departmental file structure, the sensitivity of the information, and the type of record involved, for example staffing files, tickets, work logs or personnel records.

[23] The City calculated the search fee based on the following, according to the submission:

For electronic records, fees were based on 3 minutes per search parameter [Applicant's first and last name] per location. For physical records, fees were based on 5 minutes to browse pages in one (1) drawer. The applicable rate is \$15 per half hour.

Total time required for search time: 142 minutes / \$71.00

Actual time charged: 120 minutes (rounded down to 2 hours from 142 minutes) / \$60.00

[24] OIPC has set out the following general standards for estimating search time:⁹

⁹ *Supra*, footnote 7 at paragraph [21].

- It should take an experienced employee one minute to visually scan 12 pages of paper or electronic records for responsiveness.
- It should take an experienced employee five minutes to search one regular file drawer for responsive file folders.
- It should take three minutes to search one active email account and transfer the results to a separate folder or drive.

[25] In instances where these tests do not accurately reflect the circumstances, the local authority should design a search strategy and test a representative sample of records for time. The time can then be applied to the responsive records as a whole.¹⁰

[26] The City is proposing to charge for 120 minutes (two hours) of search time. However, it appears that in arriving at that number, the City calculated three minutes per search parameter (total of six minutes) in each electronic location, which is not consistent with the general standards put out by OIPC. Instead of searching once using the Applicant's first and last name combined, the City indicated it searched the Applicant's first name and then the Applicant's last name which would have doubled the search time. If either name was common, additional non-responsive records would also have been identified. The City should have estimated three minutes per electronic location and not per search parameter which could have easily been combined.

[27] As noted at paragraph [24] of this Report, local authorities can charge three minutes to search one active email account and transfer the results to a separate folder or drive. This standard will also be applied to searching other electronic devices such as cellphones. In addition, local authorities can charge five minutes per file drawer. Applying this to the number of locations/devices to be searched, OIPC has calculated the following:

Search Location	Number of Locations	Time in Minutes
Email Accounts	10	30
G:Drives	9	27
Text Messages	2 (cellphones)	6
Ticket Tracer	1	3
Cabinets	2	10

¹⁰ OIPC [Review Report 119-2016](#) at paragraph [20].

Total Time Spent:	76 minutes 1 hour and 16 minutes
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[28] This office has calculated that the estimated amount of time it would take to search these locations/devices is 1 hour and 16 minutes (76 minutes), less than what the City estimated (120 minutes). However, before making a finding and recommendation, the other fees must be considered.

(2) Reasonableness of the Fees for Preparation

[29] As noted earlier, section 5(3) of the *LA FOIP Regulations* allows for \$15.00 per half hour of preparation time. Preparing a record for disclosure includes the time anticipated to be spent physically severing exempted information from the records. However, preparation time *does not* include time spent:¹¹

- Deciding whether to claim an exemption.
- Identifying records requiring severing.
- Identifying and preparing records requiring third party notice.
- Packaging records for shipment.
- Transporting records to the mailroom or arranging for courier service.
- Time spent by a computer compiling and printing information.
- Assembling information and proofing data.
- Photocopying.
- Preparing an index of records.

[30] OIPC has set out the following general standards for calculating time spent preparing records for disclosure:¹²

¹¹ OIPC [Review Report 252-2024](#) at paragraph [49].

¹² *Ibid*, at paragraph [50].

- The test related to reasonable time spent is generally that an experienced employee should take two minutes per page to physically sever records.
- If the above test does not reflect the circumstances (e.g., the record is complex), the local authority should test a representative sample and apply that time to the whole record.

[31] When the City calculated the preparation fee, we are of the opinion that the City performed an act of charity or kindness towards the Applicant and we commend the City for this. In particular, the original estimate issued by the City identified 147 responsive pages. Following further discussions with staff, there was a revised estimate that identified approximately 251 responsive pages, along with 36 minutes of video footage requiring severing. In the interest of fairness and equitability, the City chose to limit the charge to the Applicant to the amount stated in the *original* estimate, even though the revised estimate reflected considerably more staff time and was way more costly at \$269.00. Yet the City has only agreed to charge the Applicant \$120.00 for this access request.

- Total amount required for preparation in reality: $251 \text{ pages} = 502 \text{ mins} + 36 \text{ mins of video} = 538 \text{ mins}/\269.00
- Actual amount charged: $147 \text{ pages} = 294 \text{ mins} \text{ (rounded down to 4 hours from 294 mins)} = 240 \text{ mins}/\120.00

[32] OIPC has previously found that local authorities can charge two minutes per page to physically sever records. The City originally identified that there may be 147 pages responsive to the Applicant's access to information request, which OIPC has calculated the following time to sever: $147 \times 2 \text{ minutes/page} = 294 \text{ minutes or 4 hours and 54 minutes.}$

[33] Though OIPC agrees with the City that the time to sever 147 records would take 294 minutes (4 hours and 54 minutes), we note the City rounded down to 4 hours to lessen the charge for preparation. Based on the above calculations considering 147 pages, the City could have charged more for preparation even without considering that the City is now estimating it needs to *prepare 251 pages and 36 minutes of video for disclosure.*

- [34] As previously noted in paragraph [16] of this Report, the City did not charge for the first hour of work, which is consistent with section 5(3) of the *LA FOIP Regulations*. This will be taken into consideration when the final fee is calculated later in this Report.
- [35] Before making a finding and recommendation, one more fee must be considered.

(3) Reasonableness of the Fees for Reproduction

- [36] Section 5(2) of *LA FOIP Regulations* provides as follows:
 - 5(2)** Where access to a record or part of a record is given by providing the applicant with a copy of the record, the following fees are payable at the time when access is given:
 - (a) for a photocopy, \$0.25 per page;
 - (b) for a computer printout, \$0.25 per page;
 - (b.1) for electronic copies, the actual cost of the portable storage device provided to the applicant;

- [37] The City calculated the reproduction fee based on the following, according to the submission:

The Applicant was offered the most cost-effective option of \$10.00 to receive the records on a USB. To further reduce costs, the City notes that if the Applicant provides their own USB, this charge would be removed.

If the Applicant opted to receive the records as printed copies, the fee could exceed \$62.75. Given that the request also includes 36 minutes of video footage, receiving the records on a USB is also likely the only option.

- [38] On January 19, 2026, this office emailed the Applicant to clarify how the Applicant wanted the responsive records reproduced and provided to them. The Applicant responded on the same day that they preferred to receive the records (including video) on a USB flash drive or stick provided by the City.

[39] OIPC conducted research on the current market value of a USB flash drive or stick, and the average price was between \$6.00 to \$25.00. As such, the \$10.00 charge is reasonable.

[40] In calculating the time that is compensable for each type of fee (search, preparation and reproduction) for both record counts under consideration – we make a point showing the reasonableness of the revised fee estimate issued by the City, knowing that the Applicant is only being charged for 147 pages in this case:

OIPC findings	147 pages	251 pages plus 36 minutes of video
Time to search	76 minutes	76 minutes
Time to prepare	294 minutes	538 minutes
Search + preparation time	370 minutes	614 minutes
Minus 1 hour free	60 minutes	60 minutes
Total time	310 minutes or 5.167 hours (x \$30) = \$154.80	554 minutes or 9.23 hours (x \$30) = \$276.90
+ Production cost	\$10.00	\$10.00
Total charge	\$164.80	\$286.90
50% deposit	\$82.40	\$143.45

[41] In conclusion, there is a finding that the overall revised fee estimate of \$160.00 issued by the City was *more than* reasonable. There will be a recommendation that if the Applicant pays the 50% deposit of \$80.00, the City should continue to process the Applicant's access to information request.

IV FINDINGS

[42] OIPC has jurisdiction to undertake a review of this matter under PART VI of *LA FOIP*.

[43] The overall revised fee estimate of \$160.00 issued by the City was *more than* reasonable.

V RECOMMENDATION

[44] I recommend that if the Applicant pays the 50% deposit of \$80.00, the City should continue to process the Applicant's access to information request.

Dated at Regina, in the Province of Saskatchewan, this 29th day of January, 2026.

Grace Hession David
Saskatchewan Information and Privacy Commissioner