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June 30, 2021

City of Toronto
Infrastructure and Environment Committee
100 Queen St W
Toronto, ON M5H 2N2

Dear Committee Chair, Members, and Clerk, Infrastructure and Environment Committee :

Submission to Infrastructure and Environment Committee – July 5, 2021

Report IE23.6 Water Users Consultation on Water Fees, Charges and Programs

Crosslinx Transit Solutions Constructors (CTSC) is supportive of the City's ongoing consultation efforts on water fees and charges. As an employer building the Eglinton Crosstown LRT and large user of water, CTSC is keenly interested in participating in the ongoing consultation efforts recommended in the report. While much of the previous consultation has focused on industrial and commercial users, we believe that the large scale linear infrastructure construction sector has been overlooked in these efforts, even though construction of major linear infrastructure has many features in common with large industrial and commercial users.

Construction and maintenance of linear transit infrastructure is a unique class of business, helping the City meet its sustainability and mobility objectives and creating job growth during both construction and operation phases.

To provide some perspective on CTSC's usage of water throughout the construction period of the project:

- CTSC is building and maintaining 15 underground and 10 aboveground LRT stations on Eglinton Avenue from Weston Road to Kennedy Station, over 19 kilometres of new light rail to be operated by TTC.
- Construction of the 15 underground stations and the surface portion of the route requires the handling of enormous volumes of water through both purchasing of water from the City system and discharge of process water and groundwater into the City system.
- Since the start of the station construction in 2016, CTSC has purchased more than 330 Million litres of water and discharged almost 4.5 Billion litres of water to the City sanitary system at multiple locations along the alignment.
- CTSC's use of the City system during construction for both consumption and discharge does not have the peak characteristics of many other users of the system.
- CTSC has worked very closely with City staff to ensure a rigorous compliance program through the construction period and has developed new technology pilots with the City to provide real-time data to support compliance.

A few key points from the construction perspective on water use and water discharge as it relates to the report:

- CTSC agrees with the City's statement on **Cost-effectiveness, Transparency and Equity** "Options were considered that would promote enhanced transparency and equity with respect to water rates, charges and fees, optimize revenue management by aligning fees or charges to service demands....." and looks forward to discussions about how this translates to changes in fees and charges.
- Administration Charges – given the significant volume of water purchased and discharged, CTSC is of the view that it significantly overpays for the administrative burden included in the water rates in proportion to its use. CTSC would like consultation to include a review of an equitable administration charge and is interested in participating in the consultations with respect to this aspect of the Water Rate review.
- Applicability of administration charges to temporary discharge – much of the discussion in the report refers to water rates for purchase of water and does not address the rates charged for discharge of private water through the City's sanitary system. CTSC, through construction of the new LRT, has 34 discharge points for dewatering and process water discharge, discharging more than 4.5 billion litres or 4.5 million m³ since 2016. As the discharge rates are based on 57% of the water rate, the concern of disproportionate administration fees is still applicable for this activity.
- Consideration should be given to a reduction in capital contribution for large 'temporary' users. In keeping with the City's objectives of transparency and equity, CTSC believes that for unique large scale transit/infrastructure projects such as the Eglinton Crosstown LRT, where its largest volume usage is temporary and does not contribute to the need for capital expansion, there should be recognition of this in the discharge rates applied to this large scale linear construction.

CTSC welcomes an opportunity to participate in the upcoming stakeholder consultations on Water Rates and explore these concepts further.

Yours sincerely,



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