



Toronto Industry Network

EMAILED

July 2, 2021

Chair Jennifer McKelvie and Members of the Infrastructure -
& Environment Committee, -
10th Floor West, City Hall, -
100 Queen Street West, -
Toronto, Ontario, -
M5H 2N2. -

Attention: Matthew Green, Administrator -

Re: IE23.6 - Water Users Consultation on Water Fees, Charges and Programs

Dear Chair McKelvie and Committee Members:

The Toronto Industry Network (TIN) thanks Toronto Water for being invited to participate in this consultation process. We appreciate the opportunity to write regarding the above agenda item. Many TIN members are large water users and it is the large water users that through their water fees, help support the cost of delivering water to and treating waste water from smaller customers. Further, large water users are often major employers, hiring many Toronto residents as well paying a significant amount of property taxes.

Page 7 of the staff report states: "At its meeting on December 17 and 18, 2019, City Council requested the General Manager, Toronto Water, in consultation with the General Manager, Economic Development and Culture, to undertake a stakeholder consultation with water users to determine what, if any, water fees and charges, programs or other measures designed to support business retention, economic growth, investment and employment, Toronto Water might recommend to City Council in furtherance of the objectives of the City's economic competitiveness strategy and the City's resilience strategy; such consultation to include, but not be limited to, consideration of the following..."

It is important to view the staff recommendations before you through the lens of how they will help retain existing manufacturing operations. TIN wishes to provide the following comments:

Recommendation 4 – Sewer Surcharge Rebate Program

TIN recommends 4 a) – We ask that the need to install process metering to participate in this program should be deleted. Their use cannot capture the entire flow of water through and out of a manufacturing facility. Process meters, which are expensive to purchase and install, cannot be used for every aspect of production e.g measuring evaporation. There can be major technical challenges in their application, e.g. measuring wastewater outflows, and these meters are subject to technical challenges such as correct calibration and functioning in waste water streams.

...2

Page 2

The tried-and-true method of mass balance calculations which are verified by a third-party engineering firm has been acceptable to Toronto Water for many years, is an accurate, verifiable and affordable method of determining how much water coming into the plant is lost to evaporation and production. The mass balance method permits any manufacturer participate in the rebate program.

The reference to **tri-annual** verification is confusing. Is it three times per year or once every three years?

Regarding 4 c., it should read "...not vary greater than 10 per cent of the baseline average determined from years 2018 and 2019." This provides real data and eliminates the anomaly of possible COVID impacts on water consumption during 2020-21.

Recommendation 8 – Administrative Charge

TIN is supportive of this recommendation since it prompts transparency and fairness. Currently, large water users pay disproportionately more for the administration of their accounts than small water users. An invoice is an invoice whether it is for large or small amounts of water. We question and ask for a review of the fee schedule than ranges from \$79 for small users to \$2200 for large customers.

General – Stormwater Charge

As in the case of the Administration Charge, large water users are unfairly penalized in that they pay significantly more for storm water management than smaller water users. The cost of water has absolutely no relationship to the cost of stormwater management. We appreciate the difficulties of trying to apply a stormwater charge to the I & C sectors. We ask that staff be directed to develop a strategy to implement a stormwater charge than can come before the October Council. The element of fairness must be applied.

We thank you for your attention.

Sincerely,

Fatima Correia

Fatima Correia, PhD.
Chair – TIN Water Group

c.c. Lou Di Gironimo, General Manager,
Toronto Water