



**EPCOR Water Services Inc.
2022-2024 and 2022-2026 PBR Applications
(Public Submission - C. Lorincz) CL-EWSI-1**

Question: COE-EWSI-1

Topic: ENVIRONMENTALLY SUSTAINABLE PREVENTION OF URBAN FLOODING

Reference: C. Lorincz Submission

C. Lorincz Recommendations:

- i) Revise the “R” (runoff) coefficient for infill properties used in the formula “stormwater utility charge = A x I x R x rate” should be R = 0.65.
- ii) Consider a Reverse Yard Sump (Soakaway pit) as a City of Edmonton redevelopment requirement for new infill developments to assist with managing stormwater infrastructure replacements and upgrades.
- iii) Introduce an environmental levy for all construction projects to help offset the cost of stormwater maintenance. Implement catch basin screens, where possible, to help prevent catch basin overflow.
- iv) Ensure that all infill properties have approved lot grading to prevent overland flooding. Ensure that infill developers create a lot grading plan that defines how the lot will convey surface runoff to a City right-of-way without flowing into adjacent private properties, that they build according to the plan, and that they complete the lot grading in a timely manner. Revise the penalty for non-compliance with lot grading rules to 1% of the assessed value of the property. A 1% penalty on a home assessed at \$1,000,000 would be \$10,000. This change could provide the necessary tool to assist lot grading inspectors to ensure timely compliance.
- v) Ensure that drainage services, lot grading, property redevelopment and roadways have an effective working collaboration to mitigate overland flooding in Edmonton’ mature neighborhoods.
- vi) Allow the release of lot grading approval status and related information to the surrounding homeowners and the community members that could be negatively impacted by the infill property in question.



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- vii) These recommendations should be implemented for the proposed test years (2022 – 2026) respectively.
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EPCOR RESPONSE:

- i) EWSI will consider this recommendation when it completes an extensive review of stormwater rate structures, rates and associated rebates in preparation for the 2025-2029 PBR application. EWSI intends to complete this review to ensure that charges continue to reflect both best practices and new initiatives such as the Stormwater Integrated Resource Plan. Changes resulting from the upcoming City of Edmonton Rezoning bylaw initiative, which will alter the zoning codes across the City, will also be accommodated.

Incorporating the specific recommendation in the 2022-2024 rates was not seen as reasonable as EWSI has not had the opportunity to determine the broader implications across all customers and customer groups.

- ii) This recommendation is outside the scope of EWSI's PBR application and the responsibilities and mandate of EPCOR Water Services. This matter is within the responsibilities and mandate of the City of Edmonton and would require their review and analysis. EWSI is prepared to support the City of Edmonton in this review if required.
- iii) This recommendation is outside the scope of EWSI's PBR application and the responsibilities and mandate of EPCOR Water Services. This matter is within the responsibilities and mandate of the City of Edmonton and would require their review and analysis. EWSI is prepared to support the City of Edmonton in this review if required.
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