

December 22, 2022

The Honourable Steve Clark  
Minister of Municipal Affairs and Housing  
777 Bay Street, 17th floor  
Toronto, Ontario  
M7A 2J3

Sent by e-mail: parkwaybeltwestplan@ontario.ca

Dear Minister Clark,

**Re: Proposed Revocation of the Parkway Belt West Plan (ERO: 019-6167)**

On behalf of Hydro One Networks Inc. ("Hydro One"), we are responding to the Ministry of Municipal Affairs and Housing on the Proposed Revocation of the Parkway Belt West Plan under the *Ontario Planning and Development Act, 1994*. Transmission infrastructure is the backbone of the electricity system which powers businesses and communities.

We recognize the government is balancing many priorities, including increasing housing supply, and driving Ontario's green economy, all while ensuring a reliable, affordable, and clean grid. Hydro One maintains that for the government to realize these goals, the Parkway Belt West Plan should remain in effect.

The Greater Toronto Area (GTA) is among the fastest growing hubs in the country. The transmission lines in the Parkway Belt area not only energize the economic centre of Canada, but they will also power the majority of the 1.5 million new homes that the government is developing. This makes these corridors, and the lands around them, the most critical in the province. At present, the Parkway Belt West area provides Hydro One easy access to maintain current and build new infrastructure. Intensifying development in proximity to our corridors can create significant operational obstacles and add costs electricity consumers. Additionally, acquiring additional property to build linear corridors poses significant land acquisition challenges and a high degree of community engagement. This is especially true in the GTA where the Parkway Belt Plan West has been most effective in ensuring the integrity of this essential corridor for future utility needs.

The option of burying transmission lines has been raised to help increase land availability. However, it is important to consider that the technology and skills required to safely bury and maintain 230 kV and 500 kV circuits of this length pose operational challenges that would require considerable analysis and assessment in order to determine the feasibility of this option. We also know with certainty that burying circuits can cost approximately ten times more, and last half as long when compared to above ground transmission infrastructure.

Revitalizing the province's automotive sector is another key priority for the government. Companies like LG/Stellantis and Umicore chose Ontario over competing American jurisdictions because of our clean grid. On December 15<sup>th</sup>, the Independent Electricity System Operator (IESO) published the *Pathways to Decarbonization Report*, which found that attaining a decarbonized electricity sector by 2050, alongside aggressive electrification targets, will require a system more than double the size it is today. The Report also noted that additional bulk

transmission system infrastructure would be required in areas currently protected by the Parkway Belt West Plan.

To enable and support Ontario's housing expansion, economic growth and decarbonization, *Hydro One strongly urges the government to maintain the Parkway Belt West Plan*. We also encourage the government to continue to consider and support collocating infrastructure. For example, the collocation of future transmission infrastructure with the proposed GTA West Transportation Corridor will proactively help reduce overall impacts to natural heritage, farmland, and existing and planned communities.

We would be pleased to meet with you to discuss the above considerations and recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Lebeter", with a horizontal line extending to the right.

David Lebeter  
Chief Operating Officer

cc: Hon. Todd Smith, Minister of Energy  
Hon. Vic Fedeli, Minister of Economic Development, Job Creation & Trade