

Enbridge Feedback on the Proposed Amendments to the Mining Act 1990, Electricity Act 1998, and Ontario Energy Board Act 1998, to Protect Ontario's Economy and Build a More Prosperous Ontario

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About Enbridge Gas Inc.

Enbridge Gas is Canada's largest natural gas storage, transmission and distribution company based in Ontario, with more than 175 years of service to customers. The distribution business provides safe, affordable, reliable energy to about 3.9 million homes, businesses and industries in Ontario and is supporting the transition to a clean energy future through net-zero emissions targets and investments in innovative low-carbon energy solutions. With the recently announced acquisition of three gas utilities serving customers in five US states, Enbridge owns and operates the largest gas utility franchise in North America. The storage and transmission business offers a variety of storage and transportation services to customers at the Dawn Hub, the largest integrated underground storage facility in Canada and one of the largest in North America. Enbridge Gas is owned by Enbridge Inc., a Canadian-based leader in energy transportation and distribution.

Learn more at www.enbridgegas.com.

Introduction

Enbridge Gas Inc. (Enbridge) commends the Government of Ontario for its leadership in introducing Bill 5, Protect Ontario by Unleashing our Economy Act, 2025 (the Act). By advancing legislative and regulatory reforms to streamline permitting processes, strengthen mineral supply chains, and enhance economic competitiveness, the Act marks a significant step towards realizing Ontario's full economic potential. Enbridge welcomes the opportunity to provide input and remains committed to delivering the reliable, affordable, and scalable energy infrastructure needed to support Ontario's growing economy and the successful implementation of the Act's objectives.

Executive Summary

Ontario's long-term economic competitiveness depends not only on the development of its mineral resources, but also on its ability to rapidly deploy the energy infrastructure required to power economic growth. From housing construction and industrial development to manufacturing, agri-food processing, and clean fuel production, reliable access to energy, especially natural gas, is foundational to Ontario's ability to attract investment and build a strong, resilient economy.

Natural gas supplies nearly half of Ontario's total energy needs, delivering twice the energy output of electricity at a quarter of the cost. Its underground delivery network provides unmatched reliability, shielding households and industries from weather-related disruptions that frequently impact the electric grid. For the majority of Ontario's energy-intensive sectors, natural gas is not merely a preference; it is the only energy option that is scalable, affordable, and dependable enough to support continuous, 24/7 operations.

While the Act rightly seeks to accelerate mine development through the proposed One Project, One Process (1P1P) framework, it is critical that the same integrated, coordinated approach be extended to the energy infrastructure that mining projects rely on. Without timely access to natural gas infrastructure, designated mining projects face heightened risk, increased costs, and potential delays that could undermine Ontario's mineral strategy and economic objectives.

To support the successful implementation of the Act, Enbridge recommends the following:

1. **Extend the 1P1P Permitting Model to Strategic Energy Infrastructure**, anchored in an "all-of-the-above" energy strategy that explicitly recognizes the critical role of natural gas.
2. **Include Natural Gas and Power Infrastructure in the Scope of Integrated Permitting for Designated Mining Projects** to align energy and mining approvals under a single, streamlined process.
3. **Ensure Cross-Sector Coordination for Interdependent Energy Infrastructure** to synchronize project timelines across energy providers and developers supporting mining projects.
4. **Ensure Regulatory Certainty for Cost Recovery and Fair Return on Energy Infrastructure** by establishing clear and reliable mechanisms that enable utilities to attract capital and support timely investment. This is essential to position Ontario as a leading jurisdiction within the highly competitive North American market, particularly for

projects supporting designated mining areas where investment certainty is critical to project viability.

5. **Facilitate Indigenous Equity Partnerships in Energy Infrastructure Supporting Mining Development** through the integrated permitting and development framework.
6. **Enable Early-Stage Funding Support for Energy Infrastructure in Designated Mining Projects** to facilitate upfront engineering, permitting, and feasibility work needed to advance energy solutions in tandem with mining development.
7. **Enable Co-location of Energy and Utility Infrastructure within Ring of Fire Transportation Corridors** to reduce costs, environmental impacts, and construction risks by embedding multi-use infrastructure into shared corridors.
8. **Safeguard Energy Supply Chain Resilience Across Ontario's Energy Infrastructure** by ensuring procurement restrictions do not undermine timely access to critical components needed for energy system reliability and economic growth.

Recommendations

The following recommendations outline targeted actions to ensure the Act achieves its objectives of accelerating mineral development, strengthening supply chains, and enabling the timely delivery of the critical infrastructure required to support Ontario's economic growth, industrial competitiveness, and energy security.

Recommendation 1: Extend the 1P1P Permitting Model to Strategic Energy Infrastructure

Ontario's energy sector, like the mining industry, requires a coordinated, predictable, and streamlined permitting process to unlock economic development and meet growing demand. Yet energy infrastructure proponents face a fragmented regulatory landscape marked by unclear agency mandates, overlapping environmental reviews, and disconnected permitting timelines. These inefficiencies are more than just administrative burdens; they are direct barriers to private investment and timely infrastructure deployment. This is especially true in high-growth and under-served regions, where energy access can determine whether projects proceed or stall.

By contrast, the permitting model proposed for mining offers a more effective approach. The 1P1P framework establishes centralized delivery teams, enhances coordination across ministries, and gives proponents a more predictable path to approvals. The rationale behind this framework applies equally to natural gas infrastructure. As Ontario targets the construction of 1.5 million new homes by 2031, economic growth and rising electricity demand are fueling an unprecedented need for the timely, coordinated delivery of natural gas infrastructure.

Enbridge recommends that the government similarly adopt an integrated, cross-ministry permitting and approvals model, mirroring the 1P1P framework for energy infrastructure projects, anchored in an "all-of-the-above" energy strategy that explicitly recognizes the critical role of natural gas. This model should include transparent expectations around permitting timelines, with defined service standards or service-level agreements to guide agency response times and improve communication with proponents.

Recommendation 2: Include Natural Gas and Power Infrastructure in the Scope of Integrated Permitting for Designated Mining Projects

To ensure the success of Ontario's ambitious mining strategy and the effectiveness of the proposed 1P1P framework, it is essential that the province recognize energy infrastructure, specifically natural gas, including compressed and liquefied natural gas (CNG and LNG) and power generation, as co-dependent and enabling components of modern mining projects.

In practice, most mining projects, particularly those located in remote or under-served regions, cannot proceed without significant new or upgraded natural gas infrastructure, including pipeline connections, compressor stations, or natural gas distribution extensions. These energy investments are not secondary; they are critical-path dependencies that directly influence a project's construction timeline, operational viability, and economic feasibility.

Many of these projects are located in areas where electrification remains constrained by reliability limitations, long lead times for transmission expansion, and capital-intensive system upgrades. In these contexts, natural gas infrastructure is often the only practical option to meet both heat and power requirements at scale, ensuring uninterrupted operations in challenging geographies and climates. Moreover, natural gas offers a dependable and lower-carbon alternative to diesel and other legacy fuels still used in remote energy systems. Renewable generation and energy storage offer rapid buildout, scalable and modular solutions, siting flexibility in remote regions and benefit project development timelines.

Despite this interdependence, permitting for associated energy infrastructure is currently siloed from mine-specific approvals. This separation creates misaligned timelines, regulatory uncertainty, and inefficiencies that can undermine the broader goals of the 1P1P approach.

For example, the Environmental Assessment (EA) for mine-access roads could be structured to encompass natural gas infrastructure, ensuring that proponents who opt to integrate natural gas do not face duplicative approvals for infrastructure already evaluated under the road's EA. This type of integrated assessment would streamline approvals, avoiding the delays, increased capital costs, and risks that mining projects face under the current fragmented approach.

To unlock the full value of Ontario's mining potential, Enbridge recommends that the Ministry expand the scope of the integrated authorization and permitting plan to explicitly include essential natural gas and power generation infrastructure approvals where they are materially tied to a designated mining project.

Recommendation 3: Ensure Cross-Sector Coordination for Interdependent Energy Infrastructure

The success of designated mining projects depends not only on streamlined permitting across government ministries but also on effective coordination among the various energy providers and developers required to deliver integrated energy solutions. While the proposed Mine Authorization and Permitting Delivery Team (MAPDT) will help align government permitting processes, designated mining projects will also require coordination of interdependent infrastructure timelines among utilities, gas transmission providers, power producers, and other private sector stakeholders.

For example, where natural gas-fired power generation is required to meet the energy needs of a mining project, the construction of gas transmission infrastructure, distribution connections, and power generation facilities must be synchronized to avoid delays or stranded assets.

Without aligned project milestones and critical-path coordination across these interdependent components, delays in one infrastructure element risk undermining the viability or timing of the entire mining project.

Enbridge recommends that the Ministry incorporate mechanisms within the integrated permitting framework to facilitate coordination of timelines, approvals, and project delivery milestones across government ministries, agencies and private sector energy providers. This cross-sector alignment will help ensure that all critical-path infrastructure advances in step to meet the operational needs of designated mining projects while minimizing risk, delay, and cost.

Recommendation 4: Ensure Regulatory Certainty for Cost Recovery and Fair Return on Energy Infrastructure

In extending the scope of integrated permitting to natural gas infrastructure, it is equally important to ensure corresponding regulatory clarity regarding cost recovery mechanisms for associated energy investments. Many of these assets will be capital-intensive and long-lived, with costs that would ordinarily be recovered through the regulated rate base. Without a defined framework for cost allocation and recovery, utilities may face material uncertainty regarding whether, how, and from whom these costs will be recovered, particularly where infrastructure is required primarily to serve third-party mining projects. It is critical to clarify the applicable cost recovery principles and whether an alternative profitability index mechanism (permitting a P.I. below 1) will be established to balance affordability, fairness, and investment certainty.

This uncertainty is further compounded by recent regulatory decisions, including the Ontario Energy Board's ruling on cost of capital parameters, which, among other changes, reduced the deemed return on equity. This decrease challenges utilities' ability to attract capital in an increasingly competitive North American market. It also appears to conflict with the government's stated objective of enabling utilities to earn a fair return on the maintenance and expansion of energy systems critical to Ontario's economic development. Without a transparent and reliable pathway for cost recovery and a fair return on invested capital that is competitive with North American jurisdictions, utilities will face heightened financial risk, potentially delaying or discouraging the energy infrastructure investments necessary to support designated mining projects and regional growth.

Enbridge recommends that the government engage with the Ontario Energy Board and energy sector stakeholders to establish a clear, coordinated cost recovery mechanism. This should include options for cost recovery outside of the general rate base where appropriate, ensure a fair allocation of risk across energy stakeholders, and align regulated returns with market expectations to ensure Ontario's utilities can continue to attract the capital investment needed to build and maintain the province's critical energy infrastructure.

Recommendation 5: Facilitate Indigenous Equity Partnerships in Energy Infrastructure Supporting Mining Development

Enbridge commends the government for its leadership in expanding economic opportunities for Indigenous communities, including through the proposed \$3 billion First Nations Opportunities Financing Program to increase access to capital and promote ownership in key sectors. This commitment lays the groundwork for long-term economic reconciliation while creating tangible pathways for Indigenous communities to build generational wealth and advance self-determination.

For many Indigenous communities, energy infrastructure represents an attractive investment that delivers stable, long-term returns, enhances local energy security and self-sufficiency, generates direct and indirect employment, and supports broader community economic development goals.

Enbridge recommends that the government design the integrated permitting and development framework to actively encourage and facilitate Indigenous equity ownership in all types of energy infrastructure that directly support mining projects, including natural gas pipelines, power generation, transmission lines, and related facilities.

Recommendation 6: Enable Early-Stage Funding Support for Energy Infrastructure in Designated Mining Projects

Designated mining projects will depend on new or expanded natural gas infrastructure to meet their energy needs. Before this infrastructure can be built, utilities must undertake significant early-stage development activities, including engineering designs, environmental assessments, and feasibility studies. These activities involve substantial upfront costs and are critical to securing the necessary approvals and permits.

Under current practice, these upfront costs are typically covered by the customer, with utilities requiring a formal cost commitment or letter of intent before proceeding to limit financial risk. However, for designated mining projects operating under an accelerated, integrated permitting framework, this approach may not align with project timelines or policy objectives. Without early funding commitments, there is a risk that utilities could be perceived as bottlenecks if funding is not secured early in the process.

Enbridge recommends that the Ministry explore mechanisms to support or co-fund early-stage development costs, particularly in cases where project proponents are not yet positioned to commit capital at the required stage. Providing access to public or shared development funding would ensure that project planning and permitting can proceed without delay, while protecting utilities from undue financial risk and avoiding premature cost recovery from the general rate base.

Recommendation 7: Enable Co-location of Energy and Utility Infrastructure within Ring of Fire Transportation Corridors

Enbridge commends the government for its leadership and commitment to advancing critical road infrastructure to the Ring of Fire. This work is essential to unlocking the region's economic potential and creating long-term opportunities for Northern and Indigenous communities. We recognize the complexity of this undertaking and applaud the progress made towards achieving an all-season transportation corridor.

The development of all-season roads into Ontario's Ring of Fire presents a once-in-a-generation opportunity to efficiently and effectively deliver multiple forms of critical infrastructure to remote, under-served regions. These transportation corridors will not only facilitate mineral development but also serve as the backbone for energy, communications, and utility networks essential to supporting new communities, industrial activity, and economic growth.

Constructing road access into this terrain involves overcoming significant geographic challenges, including bedrock, muskeg, wetlands, and permafrost. These realities make

subsequent trenching or linear infrastructure development after road completion logistically complex, environmentally disruptive, and prohibitively expensive.

To avoid these downstream challenges, it is imperative that the province adopt a co-located, co-timed infrastructure delivery approach. This would embed energy infrastructure such as natural gas pipelines, power lines, and telecommunications conduits within the same corridor and construction schedule as the transportation roadbed. This “dig once” strategy reduces cumulative environmental disturbance, lowers total lifecycle costs, minimizes future construction disruption, and accelerates the readiness of the region to support industrial and community development.

Enbridge recommends that the government explicitly recognize and facilitate co-located, multi-use infrastructure corridors as part of the 1P1P framework for designated mining projects in the Ring of Fire. This should include integrated permitting, coordinated design, and joint right-of-way approvals for transportation, energy, and communications infrastructure where feasible and materially tied to the success of the mining project.

Recommendation 8: Safeguard Energy Supply Chain Resilience Across Ontario's Energy Infrastructure

Enbridge's gas distribution business has been woven into the fabric of Ontario, heating homes affordably, keeping factories humming, fueling greenhouses, and enabling energy connectivity across North America. We have proudly served Canadians for over 175 years, and it is because of this deep-rooted commitment that we fully support the government's goal of strengthening Ontario's economic independence and domestic supply chains. Enbridge has long prioritized local procurement wherever possible, and we remain committed to working toward greater domestic sourcing. At the same time, as the government considers new procurement restrictions based on country or region of origin, we respectfully caution that Ontario's energy sector is not yet fully insulated from global supply dependencies. Moving forward carefully and deliberately, and ensuring readiness before implementing such restrictions, will be critical to safeguarding energy reliability, affordability, and economic growth across the province.

This is not a question of willingness or commitment, but a reflection of the current realities of energy infrastructure supply chains. Many critical components essential to Ontario's energy infrastructure, such as power transformers, compressors and control systems, are sourced through highly integrated North American and global supply chains characterized by long lead times, manufacturing concentration and limited alternative suppliers. Procurement restrictions, depending on their scope and application, may create unintended challenges across Ontario's energy sector, including delayed access to essential equipment, increased costs, constrained availability of proven technologies, and affordability pressures for Ontario families and businesses.

Given the ambitious timelines for designated mining projects under the proposed 1P1P framework and the province's broader goals for economic growth and infrastructure development, it will be essential to ensure that procurement restrictions and supply chain policies do not inadvertently constrain the very infrastructure needed to achieve these priorities. Delays or bottlenecks in sourcing critical energy components could jeopardize Ontario's economic, energy, and environmental objectives.

Enbridge recommends that the government, in collaboration with energy sector stakeholders, undertake a proactive assessment of potential supply chain impacts associated with procurement restrictions introduced under the Ontario Energy Board

Act, 1998, and related legislation. This assessment should evaluate the availability of alternative suppliers, expected lead times, and the potential impacts on project schedules, system costs, energy reliability, and Ontario's economic competitiveness.

We further recommend that any procurement restrictions implemented under regulation include a process to determine certain exemptions, waivers, or flexibility mechanisms to safeguard critical energy infrastructure projects that are materially tied to designated mining projects or other strategic economic and energy priorities. This approach would uphold the government's commitment to domestic procurement and economic resilience, while also ensuring Ontario's energy supply chains remain robust, reliable, and capable of supporting the province's urgent economic and energy development goals.

Conclusion

Enbridge appreciates the opportunity to provide feedback on the Act and commends the government's leadership in advancing an ambitious agenda to enhance Ontario's economic competitiveness. By applying the principles of integrated permitting, cross-sector coordination, and regulatory certainty to energy infrastructure, Ontario can unlock the full value of its mineral resources while ensuring reliable, affordable, and scalable energy to drive economic growth across the province. Enbridge remains committed to collaborating with the government to advance a policy and regulatory framework that supports Ontario's long-term prosperity.

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