August 25, 2025

Ministry of the Environment, Conservation and Parks
777 Bay Street,
5th Floor
Toronto, ON

Subject: Streamlining Permissions for the Electricity Sector Discussion Paper Feedback

Introduction

Boralex welcomes Ontario's proposed streamlining of approvals for certain electricity system projects. We appreciate the opportunity to contribute to the discussion on transitioning from the Environmental Compliance Approval (ECA) process to the Environmental Activity and Sector Registry (EASR). If implemented, we believe the proposed approach will help accelerate project development timelines, enabling timely delivery to meet the critical needs of Ontario's electricity system, while maintaining the requirement proponents to design projects in accordance with municipal and provincial standards that safeguard the environment.

Question 2

Are there additional design requirements that should be considered by the LEP when developing the SWM report?

Emergency scenarios must be accounted for in the planning and design of stormwater management systems. Depending on local conditions – such as soil characteristics, groundwater levels, and proximity to water bodies - the LEP must address both local and regional concerns, including potential impacts to surrounding areas and subsurface environments. This includes, but is not limited to, identifying potential sources of contamination, listing the possible contaminates, and outlining mitigation measures that address the needs of the local community and adjacent areas.

***Recommendation**: It is recommended that the LEP define the appropriate 'level of protection' P. The LEP is responsible for reviewing applicable local requirements and designing the stormwater management system to meet or exceed pre-development runoff quality conditions, in consultation with Authorities Having Jurisdiction (AHJ), as required.*

Question 3

The ministry is completing a regulatory impact assessment to determine the cost of these proposed changes. If you have hired an LEP in the past, or if you are an LEP, please provide comments on the cost of preparing an operation and maintenance manual.

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Based on our experience, the cost of preparing an operation and maintenance manual typically ranges from approximately $10,000 to $25,000[1], depending on the project's scale and complexity. These manuals are site-specific and can vary significantly. For example, some projects may incorporate passive stormwater controls with limited infrastructure, while others may require advanced systems involving multiple outlets, storage facilities, and conduits.

Question 4

The ministry is completing a regulatory impact assessment to determine the cost of these proposed changes. If you have hired an LEP in the past, or if you are an LEP, please provide comments on the cost of preparing a Spill Contingency Plan.

Based on our experience, the cost of preparing a Spill Contingency Plan typically ranges from approximately $5,000 to $15,000[2], depending on the project's scale and complexity. These manuals are generally more standardized than site-specific.

Question 5

The ministry is completing a regulatory impact assessment to determine the cost of these proposed changes. If you have hired an LEP in the past, or if you are an LEP, please provide comments on the cost of preparing an Erosion and Sediment Control Plan.

Based on our experience, the cost of preparing an Erosion and Sediment Control (ESC) Plan typically ranges from approximately $8,000 to $30,000[3]. This variability is primarily influenced by construction sequencing, site-specific conditions, and requirements set by the AHJ. ESC Plans are tailored to individual sites and can vary significantly depending on the overall site area and the number of construction phases involved

Question 6

If you are an operator of electricity generation, distribution or transmission works, please provide comments on whether you continue to utilize transformers that use oil containing PCBs, and when you expect to have phased these types of transformers out of your infrastructure systems.

Boralex currently operates no transformers containing PCBs within Ontario.

Best regards,

Shelby Dockendorff

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[1, 2, 3] It is assumed that project management time is included and that the proponent has selected the same LEP to execute *the detailed design of all stormwater management facilities along with the Stormwater Management (SWM) report and supporting plans outlined in the discussion paper. It is also assumed that information from the Site Engineering Design is available separately for use in creating the report at no extra charge (site survey, imagery, 3D design models, etc.). Also, frequent updates to these reports are typically required with updates to the stormwater management report and design during the planning process.*