

November 7, 2025

GSAI File: 1576-001

Ministry of Energy and Mines
77 Grenville Street
Toronto, ON
M7A 2C1

Attention: Callee Robinson
Senior Policy Advisor

RE: ERO 025-1133 (Refining a protector corridor of land for future electricity transmission infrastructure in the Northwest Greater Toronto Area)
809017 Ontario Ltd
Public Input Letter

Glen Schnarr and Associates Inc. (GSAI) is pleased to make this ERO comment submission on behalf of 809017 Ontario Ltd (“the Owners”), of the lands municipally addressed 11970 Highway 50 in the City of Brampton (the ‘subject lands’). The Subject Lands are made up of two separate parcels which are generally located at the southwest corner of Highway 50 and Mayfield Road in the City of Brampton. One parcel is municipality addressed 11970 Highway 50, while the other property (which is located immediately west of the first parcel) does not have a municipal address, the Subject Lands are legally described as:

PT LT 17 CON 12 ND TORONTO GORE PT 2, 43R16385 EXCEPT PTS 1, 2, AND 3 ON R0924602. ; S/T R0789692E BRAMPTON; and,

PT LT 17 CON 12 ND TORONTO GORE PTS 1 & 2, 43R16374 ; BRAMPTON

Chronology of Key Events and Provincial Direction

The coordinated planning of transportation and transmission infrastructure in the northwest Greater Toronto Area (GTA) has long been guided by a consistent Provincial direction emphasizing integration and co-location. This approach has been reaffirmed through a series of studies, and Environmental Registry postings over the past decade.

In April 2015, the Independent Electricity System Operator (IESO) released the Northwest GTA Integrated Regional Resource Plan, which first recommended that a future transmission corridor be planned in proximity to the proposed GTA West Transportation Corridor. This early directive established the foundational principle of coordinated infrastructure planning, ensuring efficiency, minimizing land use conflicts, and reducing cumulative environmental and social impacts.

In February 2018, the Ministry of Transportation (MTO) and the IESO jointly announced the Joint Corridor Identification Study, a collaborative initiative intended to identify lands suitable for multi-purpose linear infrastructure. The stated objective of this study was to protect a shared corridor for both transportation and electricity transmission purposes, thereby reinforcing the Province's integrated planning framework.

In June 2019, the Province released the Narrowed Area of Interest (NAI), which closely mirrored MTO's Focused Analysis Area (FAA) for Highway 413. This alignment reflected the continued commitment to co-location and inter-ministerial coordination. Subsequently, in March 2020, the Ministry of Energy and Mines (MEM) posted an update to the Environmental Registry confirming that Provincial policy continued to support co-location of linear infrastructure and that the hydro corridor study would be coordinated with MTO's previous corridor analyses from 2015 and 2019.

The Province reaffirmed this policy direction in November 2020 through an Environmental Registry Decision Notice, citing strong stakeholder and public support for co-location along the Highway 413 alignment. This approach was recognized as the most effective means of minimizing impacts on natural heritage features, agricultural lands, and planned community areas. The IESO's GTA West Integrated Resource Plan, published in July 2021, further confirmed that the proposed transmission corridor was anticipated to align closely with MTO's highway study area.

This direction was reiterated during joint IESO–MTO public engagement sessions held in October and December 2024, where both agencies presented materials demonstrating that the hydro corridor study remained adjacent to Highway 413 and that the NAI and FAA boundaries were “almost identical.”

In May 2025, the Province issued another ERO Decision Notice reaffirming that ongoing refinements to the corridor were informed by updated technical studies and continued to be guided by the objective of co-location. As of mid-2025, co-location remained the underlying Provincial assumption and planning basis.

The long-standing alignment between the NAI and FAA boundaries clearly illustrates the Provincial intent that the transmission and highway corridors be planned in proximity, reinforcing the importance of keeping the two infrastructure projects co-located.

Comments:

The proposed Aerial Context Plan, the subject lands are directly impacted by Highway 413 and the Northwest GTA Transmission Corridor Narrowed Area of Interest (NWGTA NAI), and the proposed October 2025 NWGTA NAI is shown in the attachments.

On behalf of the Owners, we reviewed the Ministry of Energy and Mines (MEM) ERO posting (#025-1133) and note that the MEM's scoped study area impacts the subject lands. As such, we provide the following comments and recommendations:

1. The Owners have concerns with the proposed October 2025 refinements to the NWGTA NAI. To support the vision for an efficient and viable employment use on the subject lands, it **is our**

professional planning opinion that the Transmission Corridor should be aligned immediately adjacent to the Highway 413 right-of-way. Further, **best efforts should be made to minimize the width of the future transmission corridor, where feasible, to preserve valuable employment lands within the City of Brampton.** Even if the transmission corridor is aligned immediately adjacent to the future highway route, our client is concerned that the remaining developable area is insufficient to viably and financially advance the industrial development.

2. The Owners have an interest in developing the lands for employment uses at some point in the future. The extent of the NWGTA NAI will directly impact the feasibility of future development on the subject lands. In this context, we recommend a coordinated approach to the delivery of both the highway and transmission corridor by **co-locating the future Transmission Corridor immediately adjacent to the Highway 413 right-of-way.**
3. Placing the Transmission Corridor elsewhere on the subject lands would not only create an inefficient and fragmented employment block but would also significantly undermine the development feasibility of the Site. Such a shift would introduce **substantial delays to the delivery of much-needed employment land supply in the City of Brampton** and would be contrary to the Province's long-standing direction supporting integrated corridor planning.
4. We understand that there are existing and ongoing studies applicable to the Highway 413 FAA that include the NWGTA NAI in their scope. **We encourage the MEM to refer to and utilize those studies to support and expedite the necessary work required to refine the NWGTA NAI and the future NWGTA Transmission Corridor Environmental Assessment.** Referring to existing and ongoing studies that are applicable to the lands impacted by the NWGTA NAI will reduce duplication of effort, streamline review, expedite the planning process and accelerate housing approvals.

We appreciate the opportunity to provide these comments and reserve the right to submit additional input on the NWGTA NAI. We have shared similar comments with the City of Brampton and also intend to raise our concerns directly with the Independent Electricity System Operator (IESO), which is responsible for undertaking the NWGTA Transmission Corridor Study.

GSAI and the Owners of the subject lands would be pleased to meet or discuss these matters further, either in person or virtually. Please feel free to contact the undersigned should you have any questions or require additional information.



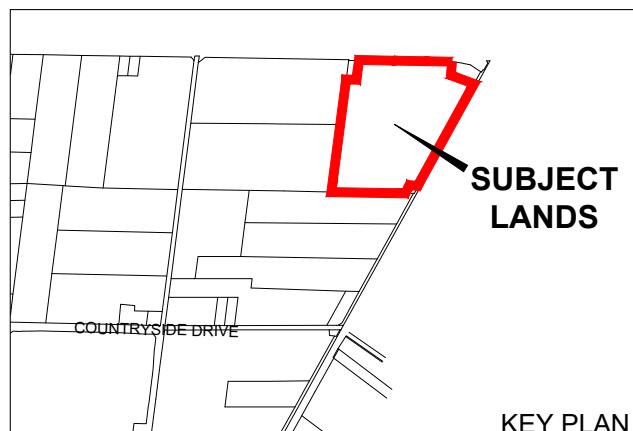
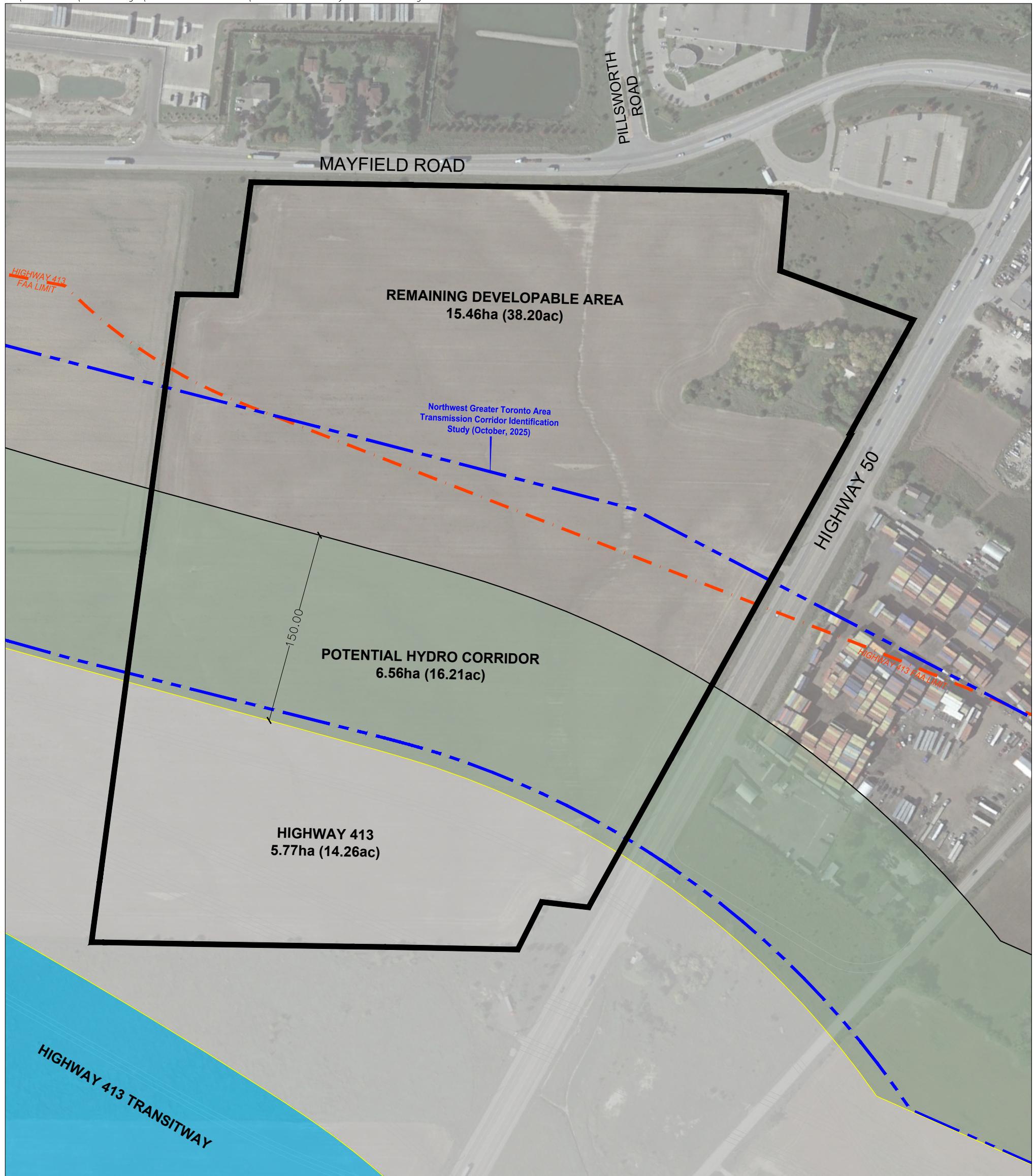
Sincerely,

GLEN SCHNARR & ASSOCIATES INC.

Patrick Pearson, MCIP, RPP
Associate

cc: Mayor and Members of Brampton Council
Steve Ganesh, Commissioner of Brampton Planning

Attachment #1: Aerial Context Plan with Proposed NAI Overlay (GSAI, November 7, 2025)



LEGEND

- SUBJECT LANDS:** Represented by a black square outline.
- FOCUSED ANALYSIS AREA:** Represented by a red dashed square outline.
- PROPOSED NARROW AREA OF INTEREST FOR NORTH WEST GTA TRANSMISSION CORRIDOR:** Represented by a blue dashed line.
- POTENTIAL 150m HYDRO CORRIDOR - 6.56ha (16.21ac):** Represented by a green shaded area.
- HIGHWAY 413 - 5.77ha (14.26ac):** Represented by a yellow shaded area.
- HIGHWAY 413 TRANSITWAY:** Represented by a blue shaded area.

HIGHWAY 413 AERIAL OVERLAY 809017 ONTARIO LTD.

11970 HIGHWAY 50
PARTS OF LOT 17 CONCESSION 12 ND
CITY OF BRAMPTON
REGIONAL MUNICIPALITY OF PEEL

SCALE 1:3,000
NOVEMBER 7, 2025

GSAI
Glen Schnarr & Associates Inc.