

Ministry of Municipal Affairs and Housing
777 Bay Street, 17th
Toronto, ON
M7A 2J3

November 21, 2025

Re: ERO:025-1099, Consultation on simplifying and standardizing official plans

Hydro One Networks Inc. (Hydro One) is Ontario's largest electricity transmission and distribution provider, serving 1.5 million customers across, managing \$32.8 billion in assets, and employing more than 10,000 people. Our province-wide footprint and technical expertise enable us to modernize and strengthen the grid efficiently and at scale. We also respond rapidly to storms and support surrounding municipalities during major weather events, building a more resilient electricity network that delivers safe, reliable power for families and businesses.

We service hundreds of municipalities and recognize the burden of developing municipal plans, as each has varying capacities for land-use planning, forecasting, zoning, and identifying distribution and transmission infrastructure needs. We strongly support simplifying and standardizing municipal plans, provided they include the information utilities require to accurately forecast capacity needs.

Information requirements

Standardizing municipal plans will make it significantly easier for Local Distribution Companies (LDCs), including Hydro One, to coordinate with municipalities and access the information required to plan the future grid, provided this information is clearly embedded in planning requirements and included under the proposed Chapter 8: *Infrastructure, Transportation, and Public Service Facilities*. Doing so will ensure municipal planners coordinate with relevant servicing LDCs early in the process and plan for future electricity needs, addressing today's inconsistent practices that often lead to delays frustrating developers, businesses, and homeowners.

The most critical information Hydro One and other utilities require is municipal growth forecasts that outline the number and type of residential units, heating source if known, acreage of commercial and industrial land, location, timeline, and confidence level for each item. Additionally, Hydro One has found that constraints from other public utilities, such as water, have the greatest impact on electrical development timelines, as electricity infrastructure typically follows and depends on these services. These constraints must be communicated to

the servicing LDC so that efforts can be directed to areas that are ready for electricity planning and growth.

These forecasts are important because they enable upstream grid investments, such as new distribution stations, which require close coordination with municipalities to secure land well in advance to avoid delays. This coordination will become increasingly critical as Ontario's electricity demand is projected to grow at unprecedented rates through 2050, necessitating a substantial increase in the number of new distribution stations constructed each year.¹

Land use designations

Under the proposed land-use designations, Hydro One recommends that distribution stations have maximum flexibility and not be restricted to industrial zoning as distribution stations need to be located to near residential zones. Without this flexibility, the land identified may be much farther from planned development areas, resulting in longer feeder builds to deliver capacity back to the development area, driving up costs and reducing reliability of supply due to increased feeder exposure.

Amend the Provincial Policy Statement to strengthen support for electrical infrastructure

In addition to standardizing and simplifying official municipal plans, it would be helpful to update the Provincial Policy Statement (PPS) to better reflect the importance of electricity infrastructure and facilitate early planning, as the PPS underpins municipal planning.

Currently, there is lack of consideration in municipal planning that has often resulted in facilities such as distribution stations not being captured in municipal plans and zoning discussions until the later stages of the planning process, or even not allocating land for electrical infrastructure at all.

When municipalities do not consult or provide land for electricity infrastructure early in the planning process Hydro One is forced to expand its search area for suitable land, often resulting in multi-year delays that create capacity constraints and prevent Hydro One from approving additional load. Beyond these delays, the land ultimately identified is frequently much farther from planned development areas than it would have been with proactive municipal planning. This leads to longer feeder builds to deliver capacity back to the development

¹ Independent Electricity System Operator. *Annual Planning Outlook: Ontario's Electricity System Needs 2026–2050*. April 2025.

area, driving up costs and reducing reliability of supply due to greater feeder exposure.

To strengthen and emphasize the importance of distribution and transmission infrastructure in municipal planning, Hydro One recommends that the language in Section 3.8.1 of the PPS be amended by replacing “should” with “shall.”²

“Planning authorities ~~should~~ *shall* provide opportunities for the development of energy supply including electricity generation facilities and transmission and distribution systems, energy storage systems, district energy, renewable energy systems, and alternative energy systems, to accommodate current and projected needs.”

This change would better reflect the essential role of electricity infrastructure and support a more proactive and coordinated approach to infrastructure planning, aligning municipal growth objectives with the requirements and timelines required to deliver reliable electricity service and infrastructure.

The PPS would further benefit from an implementation guide for electricity infrastructure that standardizes interpretation and facilitates early inclusion of distribution and transmission needs based on growth forecasts. The guide should clarify where and how municipalities must reserve land for electrical infrastructure alongside other essential services such as roads and water. It should provide examples of how municipalities can incorporate these facilities into Official Plans, outline timelines for early coordination with servicing LDCs, and include templates for mapping utility corridors and station sites in municipal plans.

Conclusion

Hydro One appreciates the opportunity to provide comments and remains committed to working closely with municipalities to meet their needs and support the growth of Ontario’s economy.

² Government of Ontario, Ministry of Municipal Affairs and Housing. (2024, October 20). *Provincial Planning Statement, 2024*



Please do not hesitate to reach out if you have any questions.

Best,

A handwritten signature in black ink, appearing to read "Bonnie Hiltz". The signature is fluid and cursive, with a large initial "B" and "H".

Bonnie Hiltz

VP, Stakeholder and Government Relations, Hydro One

Hydro One Networks Inc.

483 Bay Street
8th Floor South Tower
Toronto, Ontario M5G 2P5

HydroOne.com