

# Enbridge Feedback on Refining a protected corridor of land for future electricity transmission infrastructure in the Northwest Greater Toronto Area

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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.*

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## Introduction

Enbridge Gas Inc. (Enbridge) commends the Government of Ontario for its leadership in advancing the refinement of the Northwest Greater Toronto Area (GTA) Transmission Corridor. This initiative reflects a proactive and strategic approach to preserving critical land for long-term infrastructure development in one of Ontario's fastest-growing regions.

Enbridge appreciates the opportunity to provide input and remains committed to working with the Province to deliver the reliable, affordable, and resilient energy infrastructure needed to strengthen Ontario's economy and energy system for generations to come.

## Executive Summary

Enbridge supports the Province's continued efforts to preserve and refine a protected corridor of land in the Northwest GTA to enable the long-term development of critical linear infrastructure. The revised Narrowed Area of Interest (NAI), anchored to the future alignment of Highway 413, represents one of the last large-scale opportunities in Southern Ontario to secure a continuous right-of-way that can serve the province's growing energy, transportation, and communications needs.

However, while the proposed corridor is framed exclusively in terms of electricity transmission, Enbridge urges the Ministry of Energy and Mines (MEM) and the Ministry of Transportation (MTO) to broaden its scope to formally support multi-utility co-location, with natural gas infrastructure as a core component. This is not just a matter of planning flexibility, it is a necessity for Ontario's future energy security and economic growth.

Natural gas currently supplies nearly half of Ontario's total energy demand, delivering twice the energy output of electricity at one-quarter the cost. For energy-intensive industries and major economic anchors, natural gas is often the only scalable and economically viable option. The Province's own Integrated Energy Plan makes this clear: gas infrastructure is essential for industrial investment, system reliability, and long-term affordability. Ontario's energy future cannot be built on electricity alone. A "pipes and wires" approach, leveraging the complementary strengths of both gas and electricity networks, will be critical to delivering reliable, affordable, and resilient energy.

To unlock the full value of the protected corridor, Enbridge recommends that the Province take the following actions:

- I. **Formally Designate the NAI as a Multi-Utility Corridor:** The final decision notice and supporting land-use guidance should explicitly affirm that the protected corridor is intended to accommodate multiple types of linear infrastructure, not just high-voltage electricity transmission. This includes natural gas, broadband, and other systems essential to supporting growth, affordability, and long-term energy reliability.
- II. **Establish a Framework for Cost Responsibility and Recovery:** To enable coordinated corridor development, the Province should work with the Ontario Energy Board (OEB) to define clear principles for cost allocation, recovery, and responsibility for enabling works. This includes guidance on shared land rights, early investment timing, and proportional cost-sharing across different infrastructure classes.
- III. **Create an Integrated, Corridor-Specific Approvals Pathway:** Unlocking the corridor's potential will require a coordinated, time-bound regulatory process. Enbridge recommends the institutionalization of a cross-ministry, multi-agency approvals pathway tailored to multi-utility use, with a focus on streamlining environmental reviews, technical

assessments, and permitting timelines in alignment with the Province's One Project, One Process model.

- IV. **Align Municipal Planning with Corridor Delivery:** To support smooth project delivery over the corridor's multi-phase life cycle, the Province should provide guidance on how municipal planning and permitting frameworks can align with corridor protections under the Provincial Planning Statement (PPS). Early clarity on local coordination, zoning expectations, and access logistics will be key to project certainty.
- V. **Support Early Engagement to Strengthen Corridor Outcomes:** Given the corridor's long-term, multi-phase nature, the Province should facilitate early and ongoing coordination with municipalities, Indigenous communities, utilities, and other stakeholders. Transparent engagement will reduce land use conflicts, support technical alignment, and provide greater project certainty over the corridor's lifecycle.

## Recommendations

Building on the Province's leadership in protecting this strategic corridor, Enbridge offers the following recommendations to strengthen implementation and ensure the NAI achieves its full potential as a coordinated, multi-utility infrastructure corridor that supports Ontario's long-term growth, reliability, and affordability objectives.

### Maximizing Land Value and Minimizing Future Disruption Through Multi-Utility Co-Location

The proposed NAI represents one of the last large-scale opportunities in Southern Ontario to proactively secure a long linear corridor for future infrastructure. Given the region's rapid growth, land scarcity, and mounting pressure to expand energy and communications systems, it is essential that the protected corridor not be reserved solely for high-voltage electricity transmission infrastructure.

The PPS already emphasizes co-location and integrated infrastructure planning to minimize land disruption and environmental impacts. However, absent clear and binding direction from the government, there is a real risk that this corridor will default to a single-use transmission right-of-way, foreclosing opportunities for broader infrastructure integration and driving up long-term capital costs for other essential systems.

Multi-utility corridors are widely recognized as best practice in infrastructure development. Co-locating linear infrastructure, such as electricity transmission, natural gas, hydrogen pipelines, broadband fiber, and water/wastewater systems, can deliver significant cross-cutting benefits, including:

- ✓ Reduced land use conflicts by avoiding the need for multiple, overlapping corridors
- ✓ Lower lifecycle costs through shared access roads, crossings, and land rights
- ✓ Streamlined environmental permitting by minimizing habitat fragmentation and duplication
- ✓ Improved long-term energy system coordination, especially for load balancing, reliability, and supporting Ontario's broader energy evolution.

**Enbridge recommends that the revised NAI be formally designated as a multi-utility corridor, not solely an electricity transmission corridor.** The final decision notice and supporting land-use guidance should explicitly affirm that the right-of-way will accommodate multiple types of linear infrastructure, in alignment with Ontario's integrated infrastructure objectives and in support of long-term affordability, sustainability, and land use efficiency.

## Clarifying Cost Responsibilities to Enable Coordinated Corridor Development

While preserving land for future infrastructure is an essential first step, turning that vision into delivered infrastructure will ultimately depend on clear rules for how costs are allocated and recovered. At present, there is no defined framework governing cost responsibilities for shared corridor use, particularly when projects are staggered across time or involve different types of regulated and non-regulated infrastructure. Absent of clear direction, utilities and private proponents face uncertainty around:

- Responsibility for corridor preparation and enabling works, such as grading, road access, and baseline environmental assessments;
- Allocation of land acquisition or easement costs when multiple utilities occupy a shared corridor;
- Cost recovery pathways when one proponent fronts costs for shared-use infrastructure that others benefit from;
- Timing misalignments between projects, where early movers may be penalized for advancing infrastructure before others are ready to co-locate.

This uncertainty can undermine coordination, delay investment decisions, and reduce the viability of joint infrastructure delivery, ultimately eroding the policy objectives behind corridor protection.

**Enbridge recommends that MEM, in coordination with the OEB, establish a transparent framework for cost responsibility and recovery.** This framework should support fair and proportionate cost-sharing across infrastructure classes, set default principles for allocating costs in cases where shared corridor use is anticipated but project timelines differ, and facilitate early coordination of enabling works such as grading, access, and common infrastructure requirements.

## Integrate Approvals to Unlock Corridor Potential

The Province has a rare opportunity to set a gold standard for linear infrastructure planning by embedding a coordinated, multi-agency approvals framework directly into the design and implementation of the protected corridor.

Co-locating infrastructure is only half the solution. Co-locating approvals, and ensuring clear, consistent access protocols, is equally essential to unlocking the full value of a multi-utility corridor. A right-of-way that is protected in land-use policy but constrained by fragmented regulatory processes will fall short of its intended objectives. Energy and infrastructure proponents continue to face overlapping environmental reviews, unclear agency mandates, and disconnected permitting timelines that introduce uncertainty and delay. These inefficiencies are more than administrative friction; they are direct barriers to private investment, timely service expansion, and long-term system reliability.

**Enbridge recommends that MEM work closely with municipalities, MTO, the OEB, and other relevant provincial agencies, including the Ministry of the Environment, Conservation and Parks, to institutionalize corridor-specific approvals and access pathway.** This pathway should include:

- Streamlined permitting processes across agencies to reduce administrative burden and avoid unnecessary delays
- Expedited reviews for time-sensitive maintenance and emergency response activities to safeguard critical energy services

- Clear and coordinated access protocols to ensure safe and efficient operations for all co-located utilities
- Standardized agreements to minimize the need for project-specific negotiations and improve predictability
- Harmonized pre-consultation, concurrent technical reviews, and aligned conditions to support efficient project planning
- A time-bound decision window that reflects the urgency of regional growth and infrastructure deployment
- Early and sustained lifecycle engagement with municipalities to ensure alignment on land use planning, road access, and permitting logistics, as well as harmonization between municipal official plans and zoning allowances within PPS-designated corridors

To support continuity and provide confidence to infrastructure proponents, the Province should also ensure that existing rights and agreements for infrastructure located within the corridor remain in full force and effect. This includes any previously granted easements, permits, or access arrangements that pre-date the final designation of the protected corridor. Affirming the validity of these rights will prevent unnecessary duplication, avoid re-permitting of already approved infrastructure, and reduce legal and administrative uncertainty for utilities with assets in the corridor today.

This approach would build on the Province's broader permitting modernization efforts, such as the One Project, One Process framework, while reinforcing Ontario's leadership in strategic infrastructure planning. By embedding this approach into the protected corridor strategy, the Province can create a best-in-class infrastructure zone that supports housing, economic development, and long-term energy reliability in one of Ontario's fastest-growing regions.

### **Supporting Early Engagement to Strengthen Corridor Outcomes**

Enbridge recognizes that the successful implementation of the protected corridor will require thoughtful coordination across multiple stakeholders over time. Given the corridor's long-term, multi-phase nature and its potential to accommodate a range of critical infrastructure, early engagement and transparent communication can help reduce the risk of land use conflicts, support early technical alignment among utilities, and provide clarity for municipalities, developers, and Indigenous communities.

**Enbridge therefore encourages the Province to establish a flexible engagement framework to support ongoing communication with municipalities, Indigenous communities, utilities, and other interested parties as the corridor planning process advances.**

### **Conclusion**

The refinement of the NAI marks a pivotal moment in Ontario's infrastructure planning. With the corridor's protection reaffirmed, the Province has a timely opportunity to ensure this land purposefully leveraged to serve multiple infrastructure needs over the long term.

By enabling multi-utility use, streamlining regulatory coordination, and engaging early with municipalities, Ontario can turn this corridor into a model for integrated infrastructure delivery. Doing so will enhance investment certainty, reduce land use conflict, and support resilient growth in one of the province's most dynamic regions.

Enbridge appreciates the Province's leadership in advancing this initiative and welcomes the opportunity to continue supporting its successful implementation.



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