

Ministry of Economic Development, Job Creation and Trade
777 Bay Street
21st Floor
Toronto, ON
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Canada

November 15, 2025

RE: ERO 025-1077, Consultation on Proposed Special Economic Zones Criteria

To the Special Economic Zones Team,

We are Ontario's largest electricity transmission and distribution provider, distributing electricity to 1.5 million valued customers and manage \$32.8 billion in assets. We serve the people of Ontario by providing clean, reliable power to homes and businesses and supporting economic growth. We continue to advance Indigenous reconciliation and build the future transmission grid through our industry leading First Nations Equity Partnership Model and by partnering with Indigenous rights holders across the province. We are also proud to have achieved our goal of allocating 5% of all sourceable procurement to Ontario Indigenous businesses by 2026.

Hydro One is committed to building infrastructure that supports economic growth, while working with Indigenous communities and the public to ensure projects are completed in an environmentally responsible and sustainable manner. We work cooperatively with governments, customers, Indigenous communities, and the public to perpetually improve our environmental performance with the goal of meeting industry best practices. This includes identifying and evaluating environmental risks and minimizing any negative effects to the environment.

We remain supportive of initiatives that drive efficiencies and continue to streamline infrastructure projects such as the government's successful modernization of Environmental Assessments which have resulted in reduced timelines, costs and fewer project delays. We continue to support the creation of a Special Economic Zones within Ontario for proponents with a proven track record of high environmental, operational, and safety performance, as well as demonstrated experience and commitment to partnering with Indigenous communities.

Duty to consult

The Crown's legal Duty to Consult Indigenous communities on transmission projects must remain fully applicable regardless of any Special Economic Zone designation and policies should incorporate early and meaningful engagement,

as well as economic partnerships with Indigenous communities, both of which are essential to expediency, efficiency, and ultimately, the success of projects.

To further project efficiency and streamline Duty to Consult obligations, a single department serving as a “one-window” should coordinate across ministries and agencies, each of which would continue to manage its own permitting responsibilities while upholding the Crown’s Duty to Consult in a more consistent manner. It would be helpful for the coordinating authority to be engaged with the applicable ministries to proactively avoid delays that could otherwise result from individual ministries assessing Duty to Consult obligations in isolation or with inconsistent approach.

Such coordination could streamline consultation processes and benefit Indigenous communities by reducing repeated requests related to the same environmental sensitivities. Regardless, the Government should continue to work closely with Indigenous communities to ensure that new mechanisms for determining whether consultation is adequate are both transparent and sensitive to Indigenous capacity constraints, without which meaningful engagement cannot occur.

Clarity

While the legislation refers to Special Economic Zones, it does not specify which transmission infrastructure would be included or eligible under this designation. It is possible that only portions of a transmission line may fall within a designated zone, while significant segments, such as those connecting generation or load centres to Special Economic Zones or other strategically important projects, may lie outside of the zone due to the linear nature of transmission infrastructure. We recommend that regulations clarify that linear infrastructure projects supporting developments within Special Economic Zones, including transmission projects, be eligible for Special Economic Zone status, as these projects will drive future economic growth and, under the right circumstances, could connect remote and Indigenous communities to the grid.

Conclusion

Hydro One would like to thank the Ministry of Economic Development, Job Creation and Trade for the opportunity to comment on the proposed Special Economic Zones. The designation of Special Economic Zones for transmission projects will allow Hydro One to deliver critical project needs in support of Ontario’s energy transition, while allowing us to maintain our commitments to meaningful Indigenous partnerships, engagement and environmental protection.



Please do not hesitate to reach out to me or representatives of Hydro One if you have any questions.

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

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