



December 19, 2025

SUBJECT: ERO Posting - 025-1078 - Natural Resources Regulatory and Permit Reform Initiative: Proposing Changes to Streamline Certain Approvals under the Public Lands Act

As a company with direct experience in the development and operation of renewable energy projects, including solar, wind, and waterpower, Kruger Energy LP strongly supports the objective of moving to a registration model for certain low risk activities situated on public lands which can support the responsible development of these important energy resources. Such initiatives associated with pre-development assessment and development of renewable energy projects will help the sector deliver on much needed energy supply for Ontario, while ensuring that potential environmental and social impacts and effects are minimized, monitored and addressed.

As a CanREA member, Kruger Energy supports and echoes the comments submitted by that organization in response to this ERO posting. In particular we would like to highlight the following recommended improvements:

1. Time is of the Essence

Regarding this and related government proposals to streamline and improve regulatory approval for renewable energy projects, time is of the essence given concurrent energy procurement programs underway by Ontario's Independent Electricity System Operator (IESO), as well as considerations associated with repowering existing renewable energy assets and the opportunity for direct clean energy supply arrangements with industrial users. For example, it is anticipated that the IESO will award numerous energy procurement contracts in April 2026 via the first round of its Long Term 2 RFP, and that many of these projects may be located on public lands.

2. Wind Testing Equipment

We support the inclusion of mobile wind testing equipment and recommend expanding the registration model to include meteorological towers, which are temporary, low-impact, and essential for accurate resource assessment.

3. Geotechnical and Hydrogeological Investigations

We support inclusion of geotechnical and hydrogeological investigations in the new PLA registration regulatory regime, and we are generally in agreement with the proposed conditions. We support the comments presented by CanREA with regards to this topic.

4. Short-term Bridges

We support inclusion of short-term bridges in the new PLA registration regulatory regime and we are generally in agreement with the proposed conditions. We support the comments presented by CanREA with regards to this topic.

5. No New Occupations

We note that one proposed condition states that *“No new occupations under O. Reg. 161/17 would be allowed on public lands subject to a contract between the proponent and the Independent Electricity System Operator.”* We recommend clarifying the intent and application of this condition to avoid misinterpretation and unintended barriers to project development, and support CanREA’s questions on this matter.

Thank you for the opportunity to provide comments.

A handwritten signature in black ink that reads "Karina Seto". The signature is written in a cursive, flowing style.

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Kruger Energy LP