

Ministry of Natural Resources
99 Wellesley St W,
Toronto, ON
M7A 1W2

December 19, 2025

RE: ERO 025-1078, Natural Resources Regulatory and Permit Reform Initiative: Proposing changes to streamline certain approvals under the Public Lands Act

Hydro One Networks Inc. (“Hydro One”) is Ontario’s largest electricity transmission and distribution provider. We connect virtually every home and business in the province with our 30,000km long transmission network. Our 125,000 kms of distribution infrastructure provides over 1.5 million individual customers with safe, reliable and affordable electricity. As the connecting link bringing Ontario’s energy system together, we are a key partner in enabling the province’s Integrated Energy Plan.

We remain committed to working with the public to ensure projects are completed in an environmentally responsible, regulatory-compliant, and sustainable manner. We work cooperatively with governments, customers, Indigenous communities, and the public to perpetually improve our environmental performance with the goal of setting and exceeding industry best practices. This includes identifying and mitigating environmental risks to minimize negative impacts, a commitment that has helped Hydro One earn recognition as one of Canada’s most sustainable companies by Corporate Knights for ten consecutive years.

Hydro One supports amendments to regulations under the Public Lands Act that permit low-risk occupations, such as the proposed mobile wind testing, geotechnical and hydrogeological investigations, environmental monitoring, and short-term bridge installations, on public lands without requiring written, site-specific authorizations, provided that the duty to consult and all regulatory conditions are met and enforced.

Short term bridge clarification

Implementing a permit-by-rule or similar registration process for temporary water crossings would significantly improve timelines and place responsibility on the proponent to obtain the necessary engineered documentation. Accordingly, Hydro One recommends expanding the scope of the proposed short-term bridge provisions and implementing a permit-by-rule process for all water crossings, defined as “a bridge, culvert, or causeway constructed to

provide access between two points separated by water.”¹ Additionally, fords, which are shallow sections of a river, stream, or other water body that allow vehicles or pedestrians to cross directly through the water, should also be included, as they have a low environmental impact and require minimal modification to natural crossing points to construct.


Permanent water crossings

In addition to enabling activities, such as temporary bridges, Hydro One recommends expanding the scope to include permanent water crossings, provided they comply with Ministry of Natural Resources (MNR) requirements. This should include regular inspections of water crossing infrastructure to assess structural integrity, safety, and condition by a professional engineer, in accordance with the Ontario Structure Inspection Manual, with assessments summarized in a Bridge Condition Index. This approach would support economic development and minimize duplication of efforts, such as in cases where mining activities utilize the same access routes or where future maintenance work requires the reconstruction of temporary bridges.

Conclusion

Hydro One would like to thank the Ministry of Natural Resources for the opportunity to comment on the proposed changes to streamline certain approvals under the Public Lands Act. These changes will enable Hydro One to streamline project needs in support of Ontario’s energy transition, while allowing us to maintain our commitments 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".

Bonnie Hiltz

VP, Stakeholder and Government Relations, Hydro One

¹ O. Reg. 239/13, Activities on Public Lands and Shore Lands, Work Permits and Exemptions, under the *Public Lands Act*, R.S.O. 1990, c. P.43.