

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

December 19, 2025

RE: ERO 025-1134, Natural Resources Regulatory and Permit Reform Initiative: Improving forest legislation, regulations, processes and forest management policy

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 the establishment of a permit-by-rule framework (also referred to as "rules in regulation") that would enable proponents to self-register and remove trees that meet conditions outlined in forthcoming regulations, provided they demonstrate a strong track record of environmental performance and that the duty to consult is upheld. Doing so would reduce unnecessary steps and accelerate the development of electrical infrastructure for Ontarians while maintaining existing environmental protections.

Permit-by-rule

As part of Hydro One's work to ensure system reliability, we currently obtain "permits to remove" to clear forest for new and within existing transmission corridors and along access routes for development projects, customer connections, and regular corridor maintenance program. To further support this work and enhance reliability, Hydro One recommends moving to a permit-by-rule framework for clearing forest on access routes and corridors. This approach would streamline permitting while maintaining environmental protections.

The proposed permit-by-rule framework should cover both maintenance and new development work within transmission corridors and associated access routes, including provisions for short line taps that enable mining connections. By including all such activities under a single regulatory approach, the government can reduce administrative burden and improve project timelines, while ensuring that access routes are maintained for emergency response to ensure timely transmission reliability work and economic development across industries.

The proposed regulations should include clear limits and guidance on timing windows and other environmental conditions, such as avoiding nesting season. These measures will help balance operational needs with environmental stewardship. Additionally, all work must follow environmental best practices and guidelines established by the Ministry of the Environment, Conservation and Parks (MECP).

The proposed regulations should also stipulate that proponents must offer timber to Indigenous Communities first, supporting reconciliation and resource-sharing objectives. Finally, maintenance work in Conservation Authority regulated areas must continue to follow existing Memoranda of Understanding to ensure compliance with local environmental requirements.

Conclusion

Hydro One appreciates the Ministry's efforts to streamline the permitting process. Thank you for providing the opportunity to comment.

A handwritten signature in black ink, appearing to read "Bonnie Hiltz", with a stylized flourish at the end.

Bonnie Hiltz

VP, Stakeholder and Government Relations, Hydro One