

Ministry of Citizenship and Multiculturalism
56 Wellesley St W, 16th Floor
Toronto, ON
M7A 2E7

March 30, 2026

Submitted electronically

RE: ERO 026-0216, Heritage Framework Transformation: Proposals related to Ontario's Archaeology Program, including targeted changes to the Standards and Guidelines for Consultant Archaeologists

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 transmission network. Our 125,000 kms of distribution infrastructure provides over 1.5 million individual customers with safe, reliable and affordable electricity.

Hydro One supports the Ministry of Citizenship and Multiculturalism's (MCM's) Heritage Framework Transformation (HFT) initiative and the proposed updates to the *Standards and Guidelines for Consultant Archaeologists*, including targeted administrative changes and revised criteria for assessing Licensed Consultant Archaeologist (LCA) compliance.

We would also appreciate consideration of two additional recommendations that are critical to reducing delays in Ontario's transmission build-out and ensuring the province can meet future electricity demand necessary to unlock its full economic potential.

Recommendation 1: Include Hydro One in any advisory group (industry table) formed in next stages of HFT. Hydro One's current roster of transmission line developments will result in archeological assessment work for over 8000 ha of land across Ontario in the next three years. Given the scale of this work, we respectfully request that Hydro One be included as part of any

advisory group (industry table) formed in the next stages of the HFT to explore additional opportunities for streamlining archaeological processes, which could include (but not be limited to):

- Offering more frequent and remote Archaeological Site Data Sensitivity Training; and,
- Moving to a proponent-driven model for appropriate stages of the archaeological process, using an audit-based compliance approach rather than requiring approval of every individual report.

Recommendation 2: Continue working closely with Indigenous Rightsholders to identify opportunities to enhance archaeological practices in Ontario. Through our work building transmission projects with our First Nations equity partners, Hydro One has been made aware of concerns regarding alignment with cultural practices and the documenting, handling and stewardship of archaeological artifacts. Developing a more collaborative approach would help ensure that technical practices better reflect both statutory requirements and Indigenous stewardship priorities, enabling more meaningful participation and co-governance over cultural heritage.

Addressing these issues is important as archaeological assessment scopes, budgets and project schedule constraints continue to affect major transmission projects. Any potential project delays and their associated costs are ultimately borne by ratepayers and can affect the government's ability to deliver on its economic development, infrastructure, housing and affordability objectives.

Hydro One would like to thank the MCM for the opportunity to comment. We believe the current proposed changes, along with future revisions developed through the advisory group will help Hydro One to continue to deliver on supporting Ontario's energy transition, while further strengthening partnerships with Indigenous communities.

Please do not hesitate to reach out to me if you have any questions.

Sincerely,



Raegan Bond

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