

Enbridge Feedback on the Proposal to revoke the Parkway Belt West Plan

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About Enbridge Gas Inc.

Enbridge Gas is Canada's largest natural gas storage, transmission and distribution company based in Ontario, with more than 175 years of service to customers. The distribution business provides safe, affordable, reliable energy to about 3.9 million homes, businesses and industries in Ontario and is supporting the transition to a clean energy future through net-zero emissions targets and investments in innovative low-carbon energy solutions. With the recently announced acquisition of three gas utilities serving customers in five US states, Enbridge owns and operates the largest gas utility franchise in North America. The storage and transmission business offers a variety of storage and transportation services to customers at the Dawn Hub, the largest integrated underground storage facility in Canada and one of the largest in North America. Enbridge Gas is owned by Enbridge Inc., a Canadian-based leader in energy transportation and distribution.

Learn more at www.enbridgegas.com.

Introduction

Enbridge Inc. and its affiliate companies, including the natural gas utility Enbridge Gas Inc. (collectively referred to as “Enbridge”), appreciate the opportunity to provide feedback on the Province’s proposal to revoke the Parkway Belt West Plan. Enbridge recognizes the Government of Ontario’s objective to modernize the land use planning framework, streamline processes, and support housing, infrastructure, and economic growth. As a key energy provider in Ontario, Enbridge remains committed to delivering the reliable, affordable, and scalable energy required to support the province’s growing economy, and to working constructively with government to ensure that planning frameworks continue to reflect Ontario’s evolving infrastructure needs.

Executive Summary

Enbridge supports the Province’s objective to modernize Ontario’s land use planning framework and reduce administrative burden. However, Enbridge does not support the revocation of the Parkway Belt West Plan (PBWP). The PBWP continues to serve as a critical, coordinated planning framework that protects essential infrastructure corridors, supports public safety, and enables the reliable and affordable delivery of energy across Ontario. Rather than revoking the Plan, Enbridge recommends that the Province modernize and streamline its existing processes to better align with today’s planning environment.

The importance of maintaining a coordinated corridor planning framework is underscored by the critical role these lands play in supporting essential energy infrastructure that serves millions of Ontarians and underpins key sectors of the economy. Within the Parkway Belt West, Enbridge operates extensive natural gas transmission and distribution assets that supply over 95 percent of Ontario’s natural gas needs, serving residents, major commercial and industrial users, hospitals, schools, government facilities, and power generation. In addition, Enbridge’s liquids pipelines within the corridor transport approximately 300,000 barrels of crude oil and liquids per day, helping sustain critical supply chains and supporting the broader regional economy, including the petrochemical industry in Quebec.

At present, the proposed transition relies heavily on the Provincial Planning Statement (2024) and related initiatives, including the Parkway Belt Transmission Corridor Study. While these instruments provide important direction, they are primarily structured around electricity infrastructure and do not adequately account for the critical and enduring role of natural gas. This creates a material policy gap. Natural gas currently supplies nearly half of Ontario’s total energy demand, delivering twice the energy output of electricity at one-quarter the cost. For energy-intensive industries and major economic anchors, natural gas is often the only scalable and economically viable option. The Province’s own Integrated Energy Plan underscores this reality: natural gas infrastructure is essential to supporting industrial investment, maintaining system reliability, and preserving long-term affordability.

Without explicit policy recognition of natural gas infrastructure within provincial and municipal planning frameworks, there is a significant risk of fragmented decision-making, inefficient corridor use, and higher long-term costs for both infrastructure delivery and economic development. Ontario’s energy systems are deeply interconnected; planning for them in isolation risks undermining reliability, affordability, and the Province’s broader growth objectives.

The revocation of the PBWP also presents a second critical challenge: the potential loss of a coordinated, corridor-based planning framework that has successfully enabled the safe and efficient operation of linear infrastructure across multiple jurisdictions. As development pressures intensify across the Greater Toronto and Hamilton Area, the absence of clear and consistent corridor protections could increase public safety risks, constrain access to critical infrastructure, and trigger costly and avoidable pipeline modifications—costs that would ultimately be borne by ratepayers.

In addition, shifting permitting responsibilities to municipalities risks introducing new inefficiencies at the very moment the Province is seeking to streamline approvals and accelerate development. Without targeted reforms, the proposal could unintentionally increase timelines, regulatory complexity, and project costs.

Should the Province proceed with revocation, it will be critical to address the resulting gaps related to energy system integration, corridor protection, public safety, permitting consistency, regulatory efficiency, and cost allocation.

To address these risks and fully realize the Province's objectives, Enbridge recommends a focused set of policy enhancements:

- **Integrate natural gas into provincial planning frameworks:**
Update Sections 3.3 (Transportation and Infrastructure Corridors) and 3.8 (Energy Supply) of the Provincial Planning Statement (2024) to explicitly recognize natural gas transmission and distribution infrastructure alongside electricity. This should include clear direction to municipalities to plan for, protect, and accommodate natural gas infrastructure as part of complete energy servicing strategies. In parallel, expand the Parkway Belt Transmission Corridor Study to include consideration of natural gas infrastructure and opportunities for co-location, helping to reduce corridor fragmentation, minimize land use conflicts, streamline environmental approvals, and lower overall lifecycle infrastructure costs.
- **Maintain coordinated corridor protections and land use compatibility:**
Establish clear, province-wide standards to guide development near critical energy infrastructure. This should include a minimum setback distance of 30 metres from pipeline centrelines for new development, with a 50-metre setback in areas involving complex infrastructure such as highway and water crossings. Pipeline easements should be preserved as open space to ensure continued access for operations, maintenance, and expansion. In addition, enhanced setbacks should be applied to sensitive land uses, including a minimum 200-metre separation from institutions where rapid evacuation may be difficult, consistent with existing safety guidance.
- **Strengthen public safety and construction oversight requirements:**
Require adherence to safe ground disturbance practices for all work conducted near high-pressure pipelines and ensure that pipeline operators are authorized to monitor and inspect construction activities in proximity to their infrastructure. Align provincial requirements with Canada Energy Regulator expectations, including inspection requirements within 30 metres of federally regulated pipelines, and apply comparable standards consistently across projects. These measures are critical as development activity increases and the risk of accidental damage and encroachment grows.
- **Preserve access to infrastructure for ongoing operations and emergency response:**
Require the retention of dedicated and unobstructed access points to pipeline infrastructure across lands that may be released from the PBWP framework. This includes ensuring that future land use decisions do not constrain the ability of operators to safely conduct inspections, maintenance, emergency response, or future system upgrades. Corridor-wide access planning should be maintained as a core requirement to avoid cumulative constraints over time.
- **Maintain consistency and clarity in permitting and approvals:**
Retain provincial-level permitting authority for infrastructure within PBWP lands and utility corridors to ensure consistency, predictability, and efficiency across jurisdictions. A shift to municipality-by-municipality permitting risks creating a fragmented approvals environment, introducing variability in requirements, delays in project timelines, and uncertainty for infrastructure operators whose assets span multiple jurisdictions.
- **Improve coordination across regulatory regimes:**
Where projects are subject to both Ontario Energy Board and Canada Energy Regulator requirements, implement measures to align and streamline approvals, reducing duplication and preventing delays. Ensure that all required pipeline relocation, modification, or construction work is completed before development proceeds in close proximity to existing infrastructure to avoid safety risks, rework, and project inefficiencies.
- **Enable fair and transparent cost recovery:**
Establish a clear framework to allow pipeline operators to recover costs directly from developers where infrastructure relocation, upgrades, engineering assessments, or enhanced inspection requirements are necessitated by new development. This will ensure that costs are allocated to

the activities that drive them, rather than being absorbed into the regulated rate base and passed on to customers, supporting fairness, transparency, and affordability.

Recommendations

The following recommendations are advanced in support of the Province's objectives to modernize the planning framework and enable growth, while maintaining the integration of energy systems within land use planning, safeguarding critical infrastructure, and ensuring regulatory processes are efficient, consistent, and predictable.

Integrating Natural Gas into Provincial Energy Planning

The proposal positions the 2024 Provincial Planning Statement (PPS), together with municipal official plans and other provincial instruments, as the primary replacement framework for the Parkway Belt West Plan (PBWP), asserting that this approach will enable a seamless transition with no loss of infrastructure protection or planning clarity. However, from an energy infrastructure perspective, this assumption does not fully reflect the current policy landscape.

Both the PPS and the proposed Parkway Belt Transmission Corridor Study are structured primarily around electricity infrastructure. Sections 3.3 (Transportation and Infrastructure Corridors) and 3.8 (Energy Supply) of the PPS emphasize electricity generation, transmission, and distribution, while the Transmission Corridor Study is explicitly focused on identifying and protecting corridors for electricity. Neither framework provides equivalent, explicit direction for natural gas transmission and distribution systems.

This omission represents a fundamental misalignment with how Ontario's energy system currently operates and is expected to evolve, as well as with Ontario's broader energy policy framework. Through the Integrated Energy Plan, including the Natural Gas Policy Statement, the Province has clearly affirmed the ongoing and critical role of natural gas across the economy. Key insights from the Integrated Energy Plan include:

- Natural gas supplies 40% of Ontario's total energy needs, serving over 3.8 million (now 4 million) customers (IEP, p. 95).
- Industrial and commercial users continue to choose natural gas as the affordable option that best meets their needs. (IEP, p. 95)
- Natural gas provides a powerful combination of low cost and high energy density that cannot currently be matched by other energy sources. (IEP, p. 95)
- As a flexible and dispatchable resource, natural gas generation accounts for 28% of transmission-connected electricity capacity. It plays a crucial role in maintaining system reliability, especially during peak periods in summer and winter. (IEP, p. 95)
- Ontario's gas and electricity systems work in tandem to meet energy needs affordably, securely, and reliably. Peak natural gas demand can reach up to 121 GW, compared to 24 GW for electricity (IEP, p. 95). This interdependence is particularly evident during periods of system stress. For example, in January 2026, at the height of Winter Storm Fern, natural gas delivered the equivalent of nearly 90,000 MW of electricity, exceeding Ontario's nuclear capacity by more than six times. At moments when families and businesses rely most on energy to stay safe, warm, and operational, natural gas provides the scale, flexibility, and reliability needed to prevent shortages, stabilize energy costs, and keep Ontario's economy running.
- It is indispensable for high-temperature industrial processes that are difficult to electrify. (IEP, p. 26)
- To meet rising demand in key regions, the Province is continuing to support the rational expansion of the natural gas network. (IEP, p. 26)
- An economically viable gas network is essential to attract investment, drive economic growth, maintain customer choice, and ensure energy system resiliency and affordability. (IEP, p. 95)

The proposed transition away from the PBWP heightens the importance of ensuring that replacement frameworks are comprehensive and integrated. In the absence of clear policy direction recognizing the role of natural gas, municipalities may apply inconsistent approaches to protecting and accommodating natural gas infrastructure, while growth planning may proceed based on incomplete or overly electricity-centric servicing assumptions. This can also result in corridor planning that fails to optimize opportunities for infrastructure co-location. Over time, these gaps may lead to less coordinated infrastructure delivery, increasing both costs and timelines for utilities and development.

To address these risks and support a truly integrated energy planning framework, Enbridge recommends the following:

- Updating Sections 3.3 and 3.8 of the PPS 2024 to explicitly recognize and support the planning, protection, and development of natural gas transmission and distribution infrastructure, alongside electricity infrastructure. Clear and balanced policy direction will help ensure that all energy systems are consistently integrated into land use planning decisions and that municipalities have the guidance needed to plan for complete and cost-effective energy servicing.
- Expanding the Parkway Belt Transmission Corridor Study to explicitly include the co-location of natural gas infrastructure. Taking this approach would help reduce land use conflicts by avoiding overlapping corridors, lower overall lifecycle costs through shared infrastructure and land access, streamline environmental approvals by minimizing duplication and habitat disruption, and support more coordinated, reliable, and resilient energy system planning as Ontario's energy needs continue to evolve.

Maintaining Coordinated Corridor Planning and Oversight

The proposed revocation of the PBWP raises a second, distinct concern: the loss of a coordinated, corridor-based planning and regulatory framework that has historically supported the safe, efficient, and consistent operation of critical energy infrastructure across multiple jurisdictions.

Protecting Public Safety and Pipeline Infrastructure

The proposed revocation of the PBWP has significant public safety implications for communities located within or adjacent to utility corridors. Increased development and construction activity heightens the risk of damage to critical infrastructure, while intensification of land use near high-pressure pipelines places vital energy assets in closer proximity to population centres, introducing additional safety risks.

As development encroaches on these corridors, existing pipelines may be subject to changes in class location designation, triggering consequential operational and technical requirements. This may result in:

- pressure reductions, potentially limiting the system's ability to meet customer demand;
- replacement of existing pipelines with heavier-walled pipe;
- constrained access in emergency situations; and
- the need to access infrastructure through developed lands for ongoing operation, maintenance, and future expansion.

Where replacement or upgrading is required, further challenges arise. Existing easements are often insufficient to accommodate expanded infrastructure, necessitating the acquisition of new easements. In addition, required federal and provincial regulatory approvals for liquid and natural gas systems can take one to two years or longer, limiting the ability to respond efficiently to system needs and maintain reliable service.

Increased building density near high-pressure pipelines and associated facilities also creates ongoing operational pressures. More intensive inspection and patrol requirements would be necessary, increasing operational complexity and costs, which, for natural gas systems, are ultimately borne by ratepayers. At the same time, the integration of pipelines into residential environments heightens the risk of encroachment and accidental damage during ground disturbance activities, particularly where property owners may be unaware of existing easements.

At the same time, continued growth across the Greater Toronto and Hamilton Area has increasingly constrained physical access to utility corridors and pipeline infrastructure. The expansion of road

networks, including overpasses and interchanges, has made it more difficult to safely access pipelines for inspection, maintenance, and emergency response. Without deliberate corridor-wide planning, further development on lands released from the PBWP risks exacerbating these access challenges and undermining the safe and efficient operation of critical infrastructure.

These risks are further amplified where sensitive land uses are located in proximity to high-pressure infrastructure. Enbridge's natural gas pipelines are designed and operated in accordance with Technical Standards and Safety Authority (TSSA) guidance, which recommends maintaining a minimum setback distance of 200 metres between pipelines and institutions where rapid evacuation may be difficult, such as hospitals, long-term care facilities, and other buildings serving vulnerable populations. Maintaining appropriate separation from these uses is critical not only to safeguarding vulnerable populations, but also to preserving the integrity and safe operation of essential energy infrastructure.

To mitigate these risks and ensure the safe and reliable operation of critical energy infrastructure, Enbridge recommends that the Province:

- Establish a minimum setback distance of 30 metres from the centreline of existing pipelines and associated assets for all new development, and require that pipeline easements be preserved as open space to ensure safe access for operations, maintenance, and expansion. A minimum setback of 50 metres should also be applied in areas involving complex infrastructure, including highway and river crossings, to provide sufficient space for safe construction and maintenance activities.
- Mandate adherence to safe ground disturbance practices in proximity to high-pressure pipelines and ensure that pipeline operators are authorized to conduct onsite inspections of construction activities that may affect their infrastructure. As development activity increases, so too will the volume of utility locate requests and associated risks. Federally regulated pipelines will continue to require inspection within 30 metres in accordance with Canada Energy Regulator requirements, and comparable standards should be applied consistently across all projects.
- Incorporate enhanced setback requirements for sensitive land uses by ensuring that property lines for institutions where rapid evacuation may be difficult maintain a minimum distance of 200 metres from the centreline of existing pipelines, consistent with TSSA guidance.
- Require the preservation of dedicated and unobstructed access points to pipeline infrastructure across lands removed from the PBWP framework, ensuring that operators can continue to safely conduct inspection, maintenance, emergency response, and future expansion activities.

Maintaining Consistency in Permitting Across Jurisdictions

The proposed revocation of the PBWP would transfer certain permitting accountabilities from the Province to individual municipalities. For operators such as Enbridge, whose infrastructure spans multiple jurisdictions, this would introduce a more fragmented and variable permitting environment, undermining consistency, certainty, and clarity. It may also affect the timely operation and expansion of infrastructure within the PBWP lands and utility corridor, with broader implications for the regions these assets serve.

In light of these considerations, Enbridge recommends that the Government maintain permitting accountabilities for infrastructure within the PBWP lands and utility corridor at the provincial level.

Enabling Fair and Transparent Cost Recovery

The proposed revocation of the PBWP could have significant financial implications for companies operating within the PBWP lands and utility corridor, particularly with respect to pipeline infrastructure relocation. These requirements, often triggered by changes in class location designation resulting from nearby development, can involve substantial capital investment, complex cost recovery processes, and advanced planning obligations.

At the same time, construction activity in developed areas increases the need for detailed engineering assessments, regulatory review, and onsite inspection, all of which are resource- and labour-intensive. To meet accelerated development timelines, pipeline operators frequently rely on external consultants, further driving project costs.

In the absence of clear policy direction, these costs are likely to be absorbed into the regulated rate base and ultimately passed on to customers, rather than being attributed to the development activities that necessitate the work.

Accordingly, Enbridge recommends that the Government establish a framework enabling pipeline operators to recover costs directly from developers for engineering assessments, onsite inspection, and the relocation or upgrading of infrastructure required as a result of development. This approach would promote fair and transparent cost allocation, while minimizing unnecessary impacts on ratepayers.

Conclusion

Ontario's planning framework must evolve to support growth, but it must do so without introducing new risks to system reliability, public safety, or long-term affordability.

The PBWP has provided a consistent and coordinated approach to managing complex, multi-jurisdictional infrastructure corridors for decades. Enbridge encourages the Province to build on this foundation by modernizing the current framework to better align with today's policy landscape, while ensuring that all energy systems are integrated into planning decisions, that corridor protections remain robust and consistent, and that regulatory and permitting processes are efficient, timely, and predictable.

Enbridge remains committed to working collaboratively with the Government of Ontario, municipalities, and stakeholders to support practical, solutions-oriented approaches that enable growth while protecting public safety, strengthening economic competitiveness, and maintaining reliable and affordable energy for Ontarians.

For any further inquiries or additional information, please contact Jessica Maga, Manager, Government Affairs (jessica.maga@enbridge.com).