## Hydro One Networks Inc.

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May 17, 2019

Alex McLeod Natural Resources Conservation Policy Branch Ministry of Natural Resources and Forestry 300 Water Street Peterborough, Ontario K9J 8M5

RE: Focusing Conservation Authority Development Permits on the Protection of People and Property (ERO #013-4992)

Dear Mr. McLeod:

Hydro One is supportive of the proposal to create a regulation that further defines the ability of a conservation authority to regulate prohibited development and other activities for impacts to the control of flooding and other natural hazards. Hydro One ensures a safe, reliable and cost effective supply of electricity to the people of Ontario. Construction and maintenance of Hydro One's distribution and transmission systems on the company's Rights of Way (ROWs) are necessary in order to fulfill this mandate. Hydro One makes every effort, during the course of these activities, to avoid impacts to the natural environment. Please find our specific comments below.

## **Consolidation and Harmonization**

Hydro One is supportive of the proposal to consolidate and harmonize the existing individual conservation authority regulations into one regulation for consistency across the province.

## Low Risk Activity

Hydro One is supportive of exemptions for low-risk development activities and the continuation of exemptions for Hydro One activities (construction, planned maintenance, emergency work) which are exempt from Conservation Authority permitting requirements under Section 28(10)(d) of the *Conservation Authorities Act* with regards to powers granted under the *Electricity Act*, Section 40(1). It is critical that these exemptions continue under the new regulation in order to preserve Hydro One's ability to deliver safe, reliable and cost effective electricity to the people of Ontario.

In lieu of a formal permitting process, Hydro One intends to continue consulting with the appropriate conservation authority during the planning stage of projects. This will ensure critical information about the work including the identification of potential environmental effects and planned mitigation measures is shared.

## **Mapping**

Hydro One is supportive of a proposal to have conservation authorities notify public of changes to regulated areas such as floodplains. In addition to notification, it would be beneficial for the public to have access to Geographic information System (GIS) information which can be imported into different platforms. It requires significant effort to track individual conservation authority data on regulated areas, and consolidating this information would be of great value to our organization.

Sincerely,

Elise Croll

Director, Environmental Services