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June 8, 2020

Ms. Kirby Dier  
Network and Microgrid Policy  
Ministry of Energy, Northern Development and Mines  
77 Grenville Street, 6th Floor  
Toronto, ON M7A 2C1

Dear Ms. Dier:

**RE: ERO 019-1503 (Proposal to Identify and Protect a Corridor of Land for Future Electricity Infrastructure in the Greater Toronto Area)**

Thank you for the opportunity to provide comments on ERO Posting 019-1503, Proposal to Identify and Protect a Corridor of Land for Future Electricity Infrastructure in the Greater Toronto Area.

Hydro One Networks Inc. (“Hydro One”) is Ontario’s largest electricity transmission provider, serving almost the entire Province. In 2019, Hydro One invested more than \$1 billion in its transmission network, providing a safe and reliable system, which is essential to supporting a strong and successful Ontario.

Since 2014, Hydro One has been closely working with the Independent Electricity System Operator (IESO), formerly the Ontario Power Authority, to develop a comprehensive plan to support the future electricity infrastructure requirements of the Northwest Greater Toronto Area (GTA). Investing in future electricity transmission infrastructure in the Northwest GTA will be vital in supporting continued economic growth in the Halton, Peel and York regions.

*Question 1: Are you aware of potential barriers or issues that may be associated with the proposed narrowed area of interest?*

The 2015 Northwest GTA Integrated Regional Resource Plan (IRRP) contemplated that new transmission infrastructure would be required to meet the forecast electricity needs for Brampton, Caledon, Halton Hills and Vaughan. Appendix F of the IRRP further specified that, “A minimum of two new double circuit 230 kV transmission lines will be required within the

general vicinity of the Study Area's load growth centres and the technical details related to these facilities, including required corridor width, are to be provided by the transmitter."

In 2015, Hydro One examined the option of a 60 meter wide Northwest GTA corridor between the Milton Switching Station in Halton Region and the existing 230kV transmission corridor near the Kirby Road/Kipling Avenue in York Region (Circuits B82V/B83V). However, the connection points for the Northwest GTA corridor are not depicted in the proposed narrowed area of interest by the IESO and the Ministry of Energy, Northern Development and Mines (ENDM).

Hydro One recommends that the study confirm the connection points for the proposed transmission corridor. It is also suggested that the proposed narrowed study area map capture the existing transmission corridors, such as the 500kV/230kV corridor that the new transmission corridor will cross and the 230kV corridor (Circuits B82V/B83V) that is presumed to be the termination junction.

Given the objective for minimizing impacts to natural heritage, agriculture, and hydrological features, as well as impacts on built-up areas, Hydro One encourages that the IESO and ENDM's study also consider alternate corridor routes alongside the study area of the GTA West Transportation Corridor. It is therefore recommended that the proposed narrowed area of interest capture at least 60 meters on either side of the Ministry of Transportation's (MTO) study area for the GTA West Transportation Corridor.

Consideration should also be given to minimize and/or avoid unnecessary highway crossing by future transmission lines as such turns result in the need for more expensive, heavier equipment.

In addition, with consideration to increased growth in the northern portion of the GTA and emerging long term plans that are being contemplated for the transmission corridor travelling parallel with the 407 highway, provisioning for sufficient space, approximately 150m, would be required to accommodate further 500kV circuits.

*Question 2: Are there other principles we should consider in conducting the study?*

Hydro One supports the proposed guiding principles for corridor identification as these are largely reflective of the guiding principles outlined in Hydro One's draft Terms of Reference (2015), as part of its Environmental Assessment, for the Northwest GTA corridor.

We echo the importance of: strategic co-location of transmission infrastructure with other linear infrastructure corridors; planning for the most cost-effective option; minimizing impacts to agricultural lands, natural heritage and hydrologic features; minimizing impacts on existing municipal plans including built-up areas and planned developments; and, providing flexibility to respond to the future needs of this growing region.

We encourage that the study principles also seek out opportunities for positive impacts on the environment (e.g. natural, socio-economic and cultural). Community consultation, engagement

and education are integral part of the planning process for new transmission infrastructure. We recommend that the guiding principles also capture the importance of community engagement as this will be vital to the success of the future project.

Hydro One is pleased to see continued progress related to this project. Planning for transmission infrastructure in the Northwest GTA is important to supporting the forecasted growth in the area, and positioning it for economic recovery. We are committed to continuing to support both the IESO and MENDM with this study.

Please do not hesitate to contact me if you have any questions or would like to discuss our submission in greater detail.

Sincerely,

A handwritten signature in blue ink, appearing to read 'BJ', with a stylized flourish extending from the bottom right.

Bruno Jesus  
Vice President, Planning and Engineering