

Mr. Richard Stromberg  
Co-Ordinated Land Use Planning Review  
Ministry of Municipal Affairs and Housing  
Ontario Growth Secretariat  
777 Bay Street, Suite 425  
Toronto, ON M5G 2E5

May 28, 2015

Dear Mr. Stromberg,

I am writing to provide comments on behalf of the Ontario Energy Association (OEA) on the Co-ordinated Land Use Planning Review currently underway. By way of introduction, the OEA aspires to be the most credible and trusted voice of the energy sector. We earn our reputation by being an integral and influential part of energy policy development and decision making in Ontario. We represent Ontario's energy leaders that span the full diversity of the energy industry.

This review is a matter of importance to a number of our members (some of whom will be making individual submissions to the Secretariat) because OEA members own and operate energy transmission and distribution assets in the Niagara Escarpment, the Oak Ridges Moraine, the Greenbelt, and more broadly in the Greater Golden Horseshoe area. These assets include pipelines, compressor stations, electrical lines, transformer stations, and other infrastructure that serves local communities in the areas under review as well as transports energy to other parts of Ontario.

### **SERVING COMMUNITIES**

The OEA's comments primarily relate to the need to recognize the role of Ontario's energy infrastructure in sustaining communities in and around the four planning areas under review, and thus the importance of our members' continued ability to maintain and expand infrastructure in those areas.

Infrastructure is fundamental to economic well-being. Much of our members' infrastructure in the region has been in place for decades, though some is newer and has been built to accommodate both general population growth and increased densification. In either case the current planning framework has accommodated the servicing, upgrading, and in some cases expansion of infrastructure as needed. However, much of the land for existing utility corridors has been used up, and where it is not possible to expand along existing corridors where infrastructure already exists,

new corridors will be needed to serve rapidly growing communities in areas where energy supply infrastructure does not currently exist.

Our members support the province's commitment to protecting Ontario's natural heritage, and at the same time are pleased the review recognizes that fostering healthy, livable and inclusive communities is of tremendous importance to the continued prosperity of our province.

Reliable, affordable energy is an essential component of vibrant communities, and with Government of Ontario forecasts predicting an almost fifty percent increase in the population of the Greater Golden Horseshoe by 2041 appropriate energy infrastructure will be needed more than ever – for these communities to thrive existing infrastructure must be maintained, and new infrastructure will be needed.

## RECOMMENDATIONS

In undertaking the Co-ordinated Review the OEA therefore respectfully encourages the Ontario Growth Secretariat and the Advisory Panel to:

### Guiding Principles

1. Continue to recognize that energy infrastructure is important to economic well-being, human health and quality of life in Ontario.
2. Ensure that Ontario's energy infrastructure can continue to be developed in the areas under review in a rational manner to meet the needs of local communities.

### Streamline Development Process

3. Harmonize plans by:
  - Deeming projects approved by the Ontario Energy Board to be permitted developments for the purposes of the four plans under review; and
  - Clarifying that federally-regulated infrastructure (eg. certain pipelines) is exempt from provincial planning policies.
4. Establish clear timelines for the points in the approvals processes where the Minister or Deputy Minister have to make decisions.
5. Consolidate overlapping and duplicative approvals processes e.g. in cases where development permits necessitate plan amendments.

### Plan for Future Needs Now

6. Seek early opportunities to coordinate the planning and designation of linear energy infrastructure in developing areas in order to minimize future land use impact on communities. At the same time, continue to permit expansion of energy infrastructure along existing corridors where such possibilities exist.



### **MORE INFORMATION**

If you have any questions or would like more information on the information contained in this submission please contact Tina Arvanitis, the OEA's Vice-President, Government Relations & Communications at 647.920.3269 or [tina@energyontario.ca](mailto:tina@energyontario.ca).

All the best,

A handwritten signature in black ink that reads "Bob".

Bob Huggard  
President & CEO  
Ontario Energy Association

cc: Hon. Ted McMeekin, Minister of Municipal Affairs and Housing  
Hon. Bill Mauro, Minister of Natural Resources and Forestry  
Hon. Bob Chiarelli, Minister of Energy