



December 9, 2025

To: Mayor Olivia Chow, Chair, Executive Committee
Members, Executive Committee

From: Daryl Chong, Greater Toronto Apartment Association

Re: EX28.3 - Towards Implementing a Maximum Indoor Temperature Requirement for Rental Units and Cooling Rooms

GTAA represents the owners and managers of more than 150,000 units of multifamily, purpose-built rental housing across the GTA.

We proudly provide good housing, in professionally managed buildings, and we care about our customers.

GTAA has worked with Toronto Public Health and Municipal Licensing & Standards for many years to promote heat safety for apartment residents. Many apartment buildings have already installed an onsite cool room or space. We support the new requirement of an onsite cool room and believe the June 2026 compliance date is reasonable.

GTAA Members do NOT prohibit use of Air Conditioning in apartment buildings.

In Dec 2024, report *PH17.5 - Establishing a Framework to Address Excessive Indoor Temperatures in Leased Residential Premises* confirmed that AC units are not prohibited in apartment buildings across Toronto.

Of Toronto's 3,582 apartment buildings, there are only four buildings that do not have AC and do not allow tenants to install their own. Consultation with the owners/managers of these four buildings should take place to determine the reasons, and then remedied.

Table 2: Summary of Air Conditioning Installation Permission of RentSafeTO Registered Buildings

| Building Ownership Type | Number of Buildings Registered | Number of Buildings that Allow Tenants to Install Air Conditioning | Number of Buildings that Do Not Allow Tenants to Install Air Conditioning* |
|--|--------------------------------|--|--|
| Privately Owned | 3,012 | 2,864 | 148 |
| Social Housing | 233 | 182 | 51 |
| Toronto Community Housing Corporation (TCHC) | 337 | 305 | 32 |
| Total | 3,582 | 3,351 | 231 |

**Note: while 231 buildings do not allow tenants to install an air conditioner, most do not allow it because the building already has existing air conditioning. Program-wide, there are only 4 buildings that do not have air conditioning that also do not allow tenants to install an air conditioner.*

Air conditioning is allowed (almost universally) in Toronto's apartment buildings. This has been case for decades. A few years ago, 'window shaker' AC units were phased out due to their falling hazard, and apartment residents were encouraged to switch to portable indoor AC units. Toronto Community Housing led the way, and private rental providers followed this best practice. Guided by TCHC, GTAA Members educated residents and promoted the use of portable indoor AC units. These are readily available, quiet, efficient, and pose no safety concerns, easy to install, vent through a small window duct, and retail for \$400-\$600.

Previous studies by Toronto Public Health and Tower Renewal report that AC units were operated in about a third of the apartment units. While broadly allowed, many chose not to install an AC unit in their residence, for a variety of reasons. Many residents have said they don't need it. It's their choice. It wasn't an offered feature when they decided to move in and signed the lease.

If a resident's reason for not installing an AC unit is because they believe they are not allowed to, then we should better communicate that permission is broadly available.

If a resident's reason for not installing an AC unit is financial, then we should better communicate that there are some existing programs available to them. The PH17.5 report (Dec 2024) identified some funding under Ontario Works and ODSP, and directly from the City for those not on social assistance. This past summer the City launched a pilot program and distributed 489 portable AC units to qualified applicants based on income and medical conditions. We support approach, and the expansion of this program.

The BC government, through BC Hydro's Energy Conservation Assistance Program will provide 28,000 free portable AC units to low-income and vulnerable residents over three years. Previous BC programs have already distributed 6,000 AC units.

For operating cost assistance (electricity), the Ontario Electricity Support Program (www.ontarioelectricitysupport.ca) is monthly financial assistance, via an online application, with no deadline, that takes about 6 weeks to process. It was expanded in March 2024, to include more households. These are after-tax incomes.

| Household Income (After Tax) | Household Size (Number of people living in household) | | | | | | |
|---|--|------|------|------|------|------|------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7+ |
| \$38,000 or less | \$45 | \$45 | \$51 | \$57 | \$63 | \$75 | \$75 |
| \$38,001 - \$54,000 | | \$40 | \$45 | \$51 | \$57 | \$63 | \$75 |
| \$54,001 - \$65,000 | | | \$35 | \$40 | \$45 | \$51 | \$57 |
| \$65,001 - \$71,000 | | | | | \$35 | \$40 | \$45 |

For residents who rely on an approved medical device requiring a lot of electricity, OESP offers a higher level of assistance.

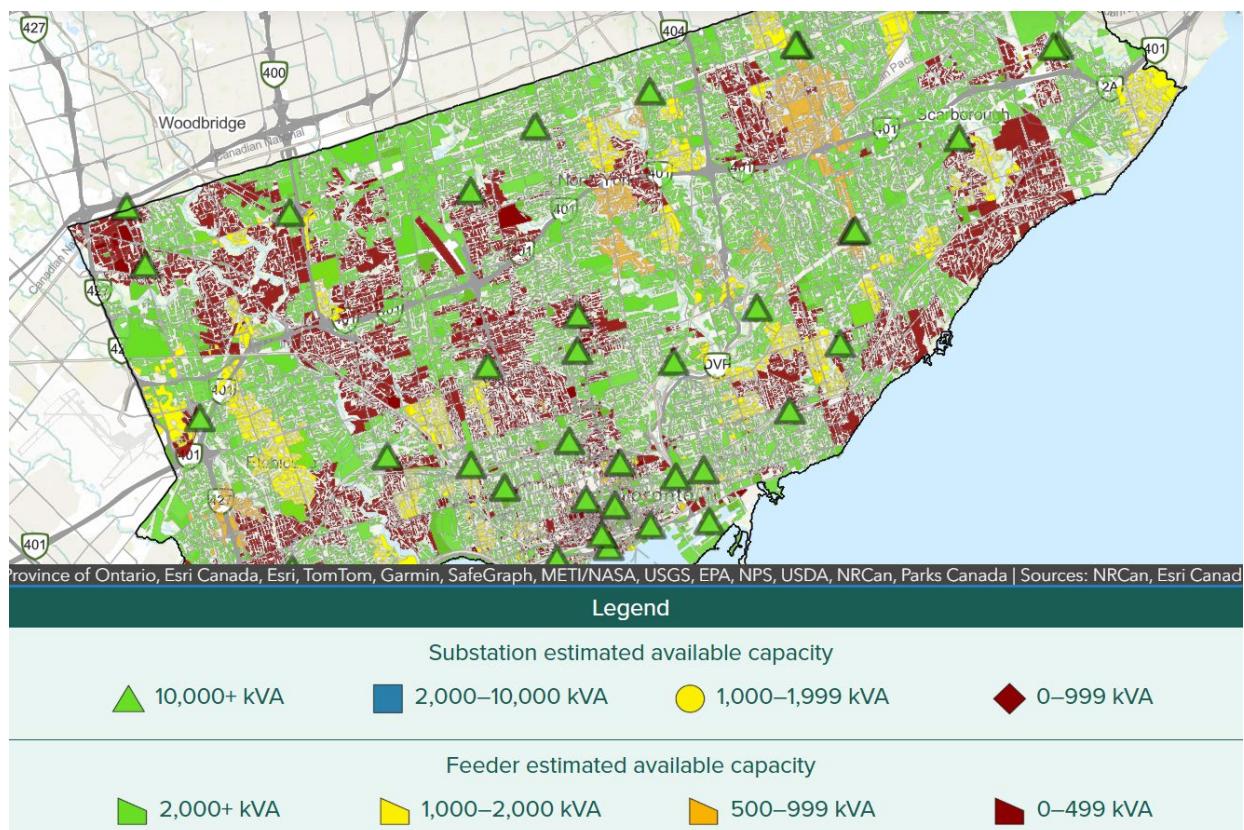
| OESP Monthly Credit Amounts by Household Income Level – Energy Intensive | | | | | | | |
|---|--|------|------|------|------|-------|-------|
| Household Income (After Tax) | Household Size (Number of people living in household) | | | | | | |
| | 1 | 2 | 3 | 4 | 5 | 6 | 7+ |
| \$38,000 or less | \$68 | \$68 | \$75 | \$83 | \$90 | \$113 | \$113 |
| \$38,001 - \$54,000 | | \$60 | \$68 | \$75 | \$83 | \$90 | \$113 |
| \$54,001 - \$65,000 | | | \$52 | \$60 | \$68 | \$75 | \$83 |
| \$65,001 - \$71,000 | | | | | \$52 | \$60 | \$68 |

Over 80% of Toronto's rental inventory was constructed before 1980, well before AC was a standard feature, and when only a few household items were plugged in. The capacity of the electrical systems within the walls throughout the building and into residential suites, and the overall electrical load provided to the building by Toronto Hydro need to be considered.

| | pre-1960 | 1960s | 1970s | 1980s | 1990s | 2000s | 2010s | 2020-2023 | Total |
|---------|----------|---------|--------|--------|--------|-------|--------|-----------|---------|
| Private | 43,047 | 117,057 | 66,827 | 5,124 | 320 | 3,417 | 11,820 | 8,278 | 255,890 |
| TCHC | 1,795 | 10,195 | 21,006 | 8,500 | 4,184 | 1,065 | 1,063 | | 47,808 |
| Social | 682 | 420 | 1,685 | 6,424 | 8,174 | 813 | 877 | 264 | 19,339 |
| | 45,524 | 127,672 | 89,518 | 20,048 | 12,678 | 5,295 | 13,760 | 8,542 | 323,037 |

Toronto Hydro recently launched their Load Capacity Map. This allows engineers/users to:

- *“Discover available electrical load capacity in neighbourhoods across Toronto.”*
- *“high-level overview of available electrical load capacity in areas across our service territory. Customers and contractors can refer to the Load Capacity Map early on in their project planning to help inform their preliminary site selection(s).”*
- *“shows the estimated available electrical load capacities of 27.6 and 13.8 kilovolt (kV) substations — also known as transformer stations (TS) — as well as 27.6, 13.8 and 4.16 kV feeders located in Toronto Hydro’s service territory.”*

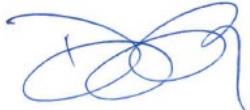


This map is updated quarterly, and shown above is Dec 2025. As shown, many apartment blocks and neighbourhoods have limited or no available electricity capacity.

Toronto Hydro Electric Company has a complex and lengthy “energization” process to request additional electricity to a specific building. It includes a design process (6-9 months), a deposit fee (usually \$500,000 per site, depending on scope), and takes about 1.5 years to receive TH’s ‘offer to connect’. TH often advises that energization will occur in 5-7 years depending on the location of the applicant’s site. These are current ‘business as usual’ timelines and will be longer if hundreds of apartment buildings applied at the same time.

We believe that apartment residents should be advised that they can install and operate safe portable AC units. That government programs should be expanded to provide qualified residents with AC units, based on income and medical requirements. That for non-qualified residents, they should continue to decide on their own to obtain and operate, or not, safe portable indoor AC units. That each apartment building with available space operate a cool room as described and proposed in the report.

Sincerely,



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