

Submission to City of Toronto Executive Committee

City of Toronto
100 Queen Street West
Toronto, ON
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Re. Supporting Multiplex Housing, Toronto Hydro report to Toronto City Council Executive



<https://secure.toronto.ca/council/agenda-item.do?item=2026.EX32.5> &
<https://www.toronto.ca/legdocs/mmis/2026/ex/bgrd/backgroundfile-287923.pdf>

June 11, 2026

Dear Mayor Chow and members of the Executive Committee,

Thank you for the opportunity to share our comments and observations about the Toronto Hydro (TH) Supporting Multiplex Housing Report to the Executive Committee of Toronto City Council, June 10, 2026.

We support the directions identified in the report and confirm that our concerns are identified in the document.

We have been working hard to be heard, and progress has been slow, but we are pleased to have Council's support and initial direction on a plan to provide better, faster, service and to provide more offerings for hook up for Missing Middle housing typologies (Mid-rise, 5 - 14 storeys, as well as Multiplexes). Toronto Hydro's "... *commitment to enhancing a performance outcomes culture that enables us and our stakeholders to assess whether our actions have in fact improved multiplex housing connections and respond accordingly*" (p 3 of the referenced report) is welcome and appropriate.

We support the report's direction and action plan but have concerns that this process could drag on, missing a critical window of opportunity to remove barriers that take time and waste energy of Missing Middle builders. Some quick wins are important to improve outcomes for the Missing Middle building sector.

Context:

Toronto's Expanding Housing Options in Neighbourhoods (EHON) initiative has led to big changes in the ways and places people can build new housing, and it's time. While Toronto's target is building 285,000 new homes by 2031, Mid-rise development on Avenues and Major Streets has the potential for at least 1.5 million homes in that timeframe. We can

accommodate most of our new development on Toronto's Avenues and Major Streets if we create the right conditions for building. Focusing on allowing more Mid-rise to be built during the "development cliff" 2028-2029 is essential for achieving our housing targets and steady employment. Mid-rise has an extremely important role to play if we want development to occur in that timeframe.

This report and its implementation must be responsive to this timing.

To that end, we think it's important that this plan includes some clear, standalone "quick wins" that do not have to wait for an organizational overhaul:

- **Provide new offerings for midrise / missing middle in the 165 - 500 kVA range before the end of 2027.**

Detailed comments:

Simplifying Processes

- We are in support of the Planned Actions in both the completion within 12 months time frame, and beyond 12 months; they capture our feedback to Toronto Hydro.
- A dedicated, end-to-end point of contact is a solid idea that should improve the system for users.
- Transparency around requirements and timelines is essential, and we are happy to see that on the within 12 months list.
- A fast track for simpler multiplex connections makes sense and can speed up housing delivery.
- A fast track for Mid-rise, 30 - 60 unit buildings would be welcome.

Modernizing Standards

We are glad to see this on the within 12 months priority list: *Review and expand supply offerings to improve flexibility for a broader range of missing middle development types and configurations, where feasible (p 7).*

We are unclear, however, why no specifics are mentioned. Assuming this action item reflects our request for Toronto Hydro to provide new offerings for midrise / missing middle in the 165 to 500 kVA range, we want those to be online, and available by the end of 2027 at the latest. If we read the report correctly, that is the plan, and that is an important priority. Specifically, please provide:

- 300 kVA pole-mounted service standard,
- a design standard for pad-mounted transformers in exterior building alcoves with reduced clearances,
- and a design standard for building interior vaults to distinguish between “small transformer rooms” up to 500kVA and larger transformer rooms up to 2,000kVA.

Other municipalities in the area (Mississauga, Kitchener) are already offering what Missing Middle builders in Toronto want. We have heard no explanation as to why Toronto Hydro is slow on the mark to offer these compared to other municipalities. It appears that the Modernizing Standards within 12 months action item “*Through jurisdiction scans and other reviews, establish a transparent understanding of where it is regulatory codes or Toronto Hydro policy that is driving connections requirements, including for current and historic installations,*” (p 8) will help to resolve this issue and identify exactly where the barriers lie.

We appreciate this action - *Formalize a process for developer input into our structured, ongoing standards improvement process* (p 8). Our experience suggests Toronto Hydro should solicit targeted feedback from specific types of professionals, not just developers. I.e. having engineers participate in our feedback about service connections to TH has been much more effective than without engineers. We want to provide feedback to proposals; developers are not trained administrative systems planners and are not going to be able to tell Toronto Hydro HOW to change their internal systems.

Improving Cost Predictability

- We suggest this be added to the Action Plan: Create a formal bulletin or guidance document focused specifically on smart load management systems.
- Members of the Mid-rise Advocacy group have shared positive feedback about the new use of non-binding estimates (under Planned Actions under 12 months). It is good to see this expanded.

- Reviewing and expanding supply offerings is the most important thing. Please do not focus on Multiplex at the exclusion of Mid-rise (5 - 14 storeys) which, as a typology, has the ability to provide more homes faster than the Multiplex sector can.
- In particular, solutions are urgently needed for six storey 30 - 60 unit buildings with higher power needs than multiplexes.
- While the Multiplex Power Play pilot to support funding smart load management is welcomed, we caution against putting too much into pilots. A streamlined process for all interested is a more urgent priority and would better reflect real life financing conditions. Toronto Hydro reports connecting about 130 - 200 multiplexes per year, so the target of 30 - 50 participants will not go very far.

Enhancing the Customer Experience

- We would like to see clearer commitments to:
 - Coordinate phasing and timing of the components of development application with the City of Toronto's Planning Department. Particularly where no site plan is required, for projects 10 units or less, leaving Hydro to the end of the process can be detrimental to development.
 - Eliminate change orders after site plan approval.
 - Specific service-level response time commitments.
 - Create a formal bulletin or guidance document focused specifically on smart load management systems.

We appreciate the 12 month priority in this section of developing and implementing an *“updated internal training program for engineering, design, and other Toronto Hydro teams involved in connections to ensure up-to-date knowledge about multiplex connections and drive an improved customer experience”* (p 10), as we believe this could help address internal inconsistencies experienced by developers.

Members of the Mid-rise Advocacy Group met multiple times with Toronto Hydro to outline our ideas for change. We pointed out areas where public facing documents and guides contained contradictory messages, or misleading cut offs for particular kinds of service. So we believe it is necessary for the connection and service departments to truly understand each other's work, timing and TH processes in order to eliminate confusing or contradictory messaging. That said, we were also introduced to guides we did not know existed, for which we were grateful.

There is now a common development pattern among multiplexes which should be workshopped with City Planning, Toronto Hydro, and multiplex developers for solutions. A multiplex developer is likely to first build up to 6 units, in part because there are no Development Cost Charges. But 1 - 2 years later they will add another unit, or possibly another floor. This is part of the project's viability. How can the customer communicate this longer term plan, or get electrical servicing for the entire scope of the project, before they have presented plans for this?

These are the **outcomes** the Mid-rise and Multiplex developers and planners we work with would like to see:

- Commitment to response times, similar to those adhered to by Conservation Authorities and Planning departments.
- Appropriate / accurate electricity needs assessments.
- No change orders once the site plan is approved.
- Flexibility for ten units or less to use an electrical pole, and not have to go to a ground vault.
- Permit below grade transformer vaults within City Right of Way.
- Prepare an *intermediate* design standard for optimized electrical service to smaller mid-rise buildings (i.e. smaller than the vault size required for tall buildings) and provide conditions for pre-approval.
- Updating the service offering for pole-mounted overhead service from 165 kVA to 300kVA, in alignment with Mississauga's offering (Alectra Utilities).
- Developing a design standard for pad-mounted transformers in exterior building alcoves with reduced clearances, in alignment with BC Hydro's technical standard up to 500kVA.
- Updating the design standard for building interior vaults to distinguish between "small transformer rooms" up to 500kVA and larger transformer rooms up to 2,000kVA, in alignment with Kitchener's technical standard.

We support Toronto's efforts to build more affordable, sustainable, infill housing. Toronto Hydro has an important role to play in supporting the viability of Missing Middle Housing. We appreciate Toronto Hydro's openness to us informing this process with our advice, and are looking forward to seeing more positive changes implemented quickly.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Claire Malcolmson". The signature is fluid and cursive, with the first name "Claire" being more prominent and the last name "Malcolmson" following in a similar style.

Claire Malcolmson, MES

Mid-rise Advocacy Group Project Manager

About Us: We are a group of planners, architects, construction managers and builders working together to advance the solutions that can make Mid-rise building more viable in Toronto and across the province. This Mid-rise Manual, commissioned by Environmental Defence and former infill developer Robert Eisenberg, is a step-by-step guide to achieving this. Our goals and recommendations for all three levels of government are in our Mid-rise Manual: <https://www.svn-ap.com/insight/the-Mid-rise-manual> We thank the Mid-rise Manual's authors for this timely and practical report.