

Monday, June 15, 2026

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To: Mayor Olivia Chow
Executive Committee
City of Toronto
100 Queen St. W., 13th Floor
Toronto, Ontario M5H 2N2

Re: Toronto Hydro Policies, Housing Affordability and Missing Middle Housing EX32.5A

Dear Mayor Chow and Members of Council,

Thank you for your leadership in advancing housing supply through the Expanding Housing Options in Neighbourhoods initiative and related housing reforms.

Eurodale Design + Build is a Toronto-based designer, builder and developer with decades of experience delivering housing throughout the city, including custom homes, additions, renovations, multiplexes and Missing Middle housing projects.

We are writing in support of Council's request that Toronto Hydro review its policies and procedures as they relate to housing delivery. Our experience with an eight-unit multiplex rental project at 18 & 20 Austin Terrace demonstrates why this review is necessary.

For more than one year, we have been attempting to secure a 400-amp electrical service for this project. During that time, our request for a code-compliant aerial service solution has been:

Reviewed and denied by engineering staff;

Reviewed and denied by management;

Reviewed and denied by the Office of the President; and

Escalated to Toronto Hydro's Customer Advocate, where it resides unconfirmed today. A site visit was ultimately conducted and, at the time of writing, we continue to await a response. Regardless of the final decision, a process exceeding one year to determine how electrical service will be delivered to six homes is inconsistent with the urgency of Toronto's housing crisis.

The Issue Is Policy, Not Safety

We fully support maintaining rigorous safety standards. However, Toronto Hydro's current Conditions of Service require all 400-amp residential services to be supplied underground, regardless of site-specific circumstances. This requirement exceeds what is universally required under the Ontario Electrical Safety Code and differs from practices employed by other Local Distribution Companies across Ontario. Furthermore, examples of aerial 400-amp residential services and cable fuse limiter installations exist within Toronto itself, including projects completed within the last decade. This raises concerns regarding consistency, predictability and transparency in the application of servicing standards.

Housing providers require clear and predictable rules. If a servicing arrangement is unsafe, it should not be approved. If it is safe and code-compliant, applicants deserve an expeditious approval first, failing which, clarity regarding why it may be approved in one circumstance but not another.

Cost Impacts on Housing Delivery

The cost impacts are substantial. For our project, Toronto Hydro's public-side connection costs alone are approximately \$50,000. Private-side infrastructure must then be installed at additional cost. The total servicing cost is approximately ten times greater than a comparable aerial solution. These costs directly affect housing feasibility.

We are aware of multiplex projects receiving electrical servicing estimates ranging from approximately \$200,000 to \$350,000 for buildings containing as few as six housing units. When financed and recovered over twenty years, these costs can require well over \$200 per month in additional rent per unit simply to recover utility servicing expenditures. These costs are rarely visible to the public, yet they directly influence housing affordability.

Built Form Classification Creates Additional Barriers

We also encourage Council to review how utility servicing standards classify emerging housing forms. Today, a stacked townhouse development may receive multiple 200-amp overhead service connections serving individual units. However, a multiplex delivering similar density and similar housing outcomes may be required to receive a single 400-amp service, thereby triggering underground servicing requirements and significantly higher costs.

The practical result is that two housing forms delivering similar housing outcomes can face dramatically different servicing costs based primarily on classification rather than actual electrical demand. As Toronto embraces multiplexes and other Missing Middle housing forms, servicing standards should evolve accordingly.

Utility Servicing Costs Are Becoming Disproportionate

The cost of electrical servicing has become increasingly disproportionate relative to other municipal infrastructure.

Appendix A – Illustrative Utility Servicing Cost Comparison			
Utility	Public Side Cost	Private Side Cost	Total Cost
Sewer + Water (City of Toronto)	\$19,322.54	\$12,000.00	\$31,322.54
Gas (Enbridge)	\$0.00	\$2,500.00	\$2,500.00
Electricity (Toronto Hydro)	\$48,554.01	\$40,000.00	\$88,554.01

This comparison is particularly concerning given broader governmental efforts to electrify buildings and reduce reliance on fossil fuels.

Current servicing policies can create incentives for developers and property owners to:

- Increase reliance on natural gas;

- Reduce electrical demand to avoid service upgrades; or
- Abandon housing intensification projects altogether because the economics no longer work, resulting in longer commutes to bedroom municipalities in the Province whose hydro provider works with code rather than restrictive policies.

These outcomes undermine both housing policy and climate policy objectives.

Request to Council

We respectfully request that Council direct Toronto Hydro to review:

- Underground-only requirements for residential 400-amp services;
- Consistency and predictability of service standards;
- Opportunities for site-specific engineering review of code-compliant alternatives;
- Variance and exception procedures;
- Customer connection timelines and escalation processes;
- Treatment of multiplexes relative to other similar housing forms; and
- The cumulative housing affordability impacts of utility servicing policies.

Council has worked diligently to remove barriers to multiplexes, garden suites, laneway suites and other forms of Missing Middle housing. However, planning approvals alone do not create housing.

A development approval cannot create housing until it receives power. Utility servicing policies are therefore housing policy.

We respectfully ask Council to ensure those policies support Toronto's housing objectives rather than unintentionally creating new barriers after planning approvals have already been secured.

Respectfully submitted,



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cc: BILD, OHBA