

September 3, 2020

**BY EMAIL AND RESS**

Ms. Christine E. Long  
Board Secretary  
Ontario Energy Board  
Suite 2700, 2300 Yonge Street  
P.O. Box 2319  
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EB-2017-0182: Notice of In-Service Date Change**

**Introduction and Summary**

This letter is filed on behalf of Upper Canada Transmission Inc. operating as NextBridge Infrastructure (“NextBridge”) in respect to Conditions 3 and 4 of the Ontario Energy Board’s (the “Board” or the “OEB”) Order dated February 11, 2019, granting Leave to Construct the East-West Tie Line (EB-2017-0182 | EB-2017-0194 | EB-2017-0364). (the “Order”).

In summary, NextBridge is advising the Board that, in accordance with Conditions 3 and 4 of the Order, it is proposing a change in construction schedule for the East-West Tie Line to reflect a change to the in-service date of the East-West Tie Line from the fourth quarter of 2021 to March 31, 2022. As described in greater detail below, NextBridge submits that this delay will continue to meet reliability requirements while avoiding increases in construction costs caused by the temporary suspension of construction activities attributable to the potential impacts of the health and safety of its construction workers in April, 2020 due to COVID-19.

**Discussion**

Conditions 3 and 4 of the Order provide as follows:

3. Independent of any reporting requirements under NextBridge’s licence, NextBridge shall advise the OEB of any proposed material change in the NextBridge-EWT Project in respect of routing, construction schedule, necessary environmental approvals, and all other approvals, permits, licences, certificates and rights required to construct the proposed facilities.
4. NextBridge shall coordinate with Hydro One to align the in-service date of the NextBridge-EWT Project with the in-service date for the Hydro One-Station Upgrades Project.

With respect to Condition 3, in accordance with the directions in the Independent Electricity System Operator (the “IESO”) reliability assessments, NextBridge proposed as set forth in its quarterly reporting that the East-West Tie Line be brought into service in the fourth quarter of 2021.

As NextBridge advised the Board in its July 22, 2020 Report filed herein, “Due to the recent temporary suspension of the construction of the Project due to COVID-19 precautions, the Project execution schedule will be evaluated as construction progresses for impacts. In the event project schedule or construction costs are impacted, NextBridge will explain them in their quarterly report(s).” A copy of that report is provided as Attachment 1.

Also on July 22, 2020, NextBridge wrote the IESO inquiring whether, in light of these delays, the in-service date for the East-West Tie Line could be extended until March 31, 2022 without an adverse impact on reliability. That letter stated:

Due to the potential impacts to the health and safety of its construction workers, NextBridge temporarily suspended all construction activities on April 3, 2020 and resumed again on May 19, 2020, resulting in the loss of over six weeks of winter construction. . . . Due to winter road restriction in the OBP, only one winter construction season remains to complete construction on the approximately 80 kilometer transmission line segment in the Lake Superior caribou habitat. To mitigate this schedule risk and ensure an October 28, 2021 in service date, NextBridge is seeking an amendment to this condition which would allow for all season roads to be built in order to extend the construction season. However, the building of these roads could result in an increased cost to the project of between \$15-\$20 million. If acceptable to the IESO, NextBridge's preference would be to avoid these additional costs to customers and, at the same time, comply with the current condition, both of which would be achievable with increased flexibility to extend the in service date to March 31, 2022.

NextBridge’s Letter to the IESO is provided as Attachment 2.

On August 28, 2020, the IESO responded and concluded that “the IESO does not expect an increased risk to reliability if the project’s in-service date is delayed to March 31, 2022 and, therefore, has determined that an in-service date of March 31, 2022 does not present an unacceptable risk to reliability.” The IESO letter is provided as Attachment 3.

NextBridge is therefore advising the Board that, in accordance with Condition 3 of the Order, it is proposing a change in construction schedule for the East-West Tie Line to reflect an in-service date of March 31, 2022. NextBridge submits that this delay will continue to meet reliability requirements while avoiding unnecessary increases in construction costs.

In accordance with Condition 4 of the Order, NextBridge is coordinating with Hydro One Networks, Inc. (“HONI”) to align schedules to extend the in-service date of the East-West Tie line to March 31, 2022, which provides NextBridge additional construction flexibility that could save

customers from increases in construction costs. When the aligning of schedules is complete, NextBridge will notify the OEB.

### **Conclusion**

Based on the unforeseen delay brought about by the suspension of the construction of the Project due to COVID-19, the cost of meeting a fourth quarter 2021 in-service date in light of those delays, and IESO's determination that extending the in-service date of the East-West Tie Line to March 31, 2022 does not present an unacceptable risk to reliability, and in accordance with Conditions 3 and 4 to the Order, NextBridge is hereby advising the Board of the change in construction schedule for the in-service date from the fourth quarter 2021 to March 31, 2022.

Please advise if the Board has any questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads "J. Tidmarsh". The signature is written in a cursive style with a large, looping initial "J".

Jennifer Tidmarsh  
Project Director, NextBridge