

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15 (Sched. B), and in particular, s.92 and s.97 thereof;

**AND IN THE MATTER OF** an Application by Hydro One Networks Inc. for an Order granting leave to construct five circuit kilometres of 230 kV underground transmission cables in downtown Toronto.

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**SUBMISSIONS OF THE  
BUILDING OWNERS AND MANAGERS ASSOCIATION, GREATER TORONTO  
("BOMA")**

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**February 4, 2021**

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## **SUBMISSIONS OF BOMA**

### **Overview**

1. BOMA supports this application for leave to construct a tunnel approximately 3m in diameter, 2.5km in length, at a depth of 25m below ground within the City of Toronto's existing road allowances to replace 7.2 circuit km of 115 kV low-pressure oil-filled underground cables that were in-serviced in 1959 and are at end of life with 5 circuit km of 230 kV rate crosslinked polyethylene ("XLPE")-type cable. BOMA supports the additional \$500,000 cost to install 230 kV rated cables to be operated at 115 kV that, on the evidence, will improve long-term reliability. BOMA supports the project as applied-for using a standard sized Tunnel Boring Machine that will result in 3m wide tunnel that will have the potential to accommodate two additional circuits in the event of future expansion or replacement of nearby underground assets. In summary, the project is consistent with BOMA members' interests with respect to prices and the reliability and quality of electricity service supplied to Toronto hospitals along University Avenue, the University of Toronto, Toronto City Hall, the Toronto financial district and tourist/entertainment areas.

### **Background**

2. On October 27, 2020, HONI applied to the under sections 21, 92 and 97 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, (Schedule B), for an order granting leave to construct approximately 5 circuit km of 230 kV electricity transmission line and associated facilities in the City of Toronto. If the application is approved as filed, the transmission line would replace an existing 7.2 circuit km of 115 kV transmission line

connecting Esplanade Transformer Station to Terauley Transformer Station. The project was recommended in HONI's Toronto Regional Infrastructure Plan dated March 6, 2020 with a planned in service date of 2024 and a budgetary estimate of \$128 Million.

3. On December 7, 2020, BOMA applied for intervenor status and cost award eligibility in this proceeding.
4. On December 10, 2020 the OEB issued Procedural Order No. 1 in this proceeding. As part of that order, the OEB granted BOMA's application for intervenor status and cost award eligibility.
5. In accordance with Procedural Order No. 1, on January 6, 2021 BOMA served and filed interrogatories with respect to the application.
6. On January 7, 2021, HONI filed a letter advising that it would removing the mid-shaft from the works being requested as part of the Application.
7. On January 18, 2021, HONI filed responses to all interrogatories along with an updated Application that removed any references to the originally proposed mid-shaft.
8. BOMA accepts that:
  - (a) there are no non-wire or distribution system alternatives to replacing the aged cables to maintain reliability;
  - (b) while the cables will be insulated to 230 kV they will continue to operate at 115 kV and their 230 kV rating will be able to accommodate high temporary

overvoltages during fault conditions, thus reducing the likelihood of damage requiring repair and improving long-term reliability.

9. BOMA has reviewed the application and responses to interrogatories and is supportive of the application.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED ON BEHALF OF BOMA  
ON FEBRUARY 4, 2021**



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**Albert M. Engel, Counsel for BOMA**