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**File No. 14898.13**

June 20, 2025

**DELIVERED BY EMAIL**

Ritchie Murray  
Acting Registrar  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto, ON M4P 1E4

Dear Mr. Murray:

**Re: PUC (Transmission) LP by its general partner PUC (Transmission) GP Inc.  
("PUCT")  
Ontario Energy Board ("OEB") Proceeding No. EB-2023-0360 ("Proceeding")  
Post-Approval Conditions**

We are counsel to PUCT in connection with the above-noted Proceeding. On August 27, 2024, the OEB issued its Decision and Order in the Proceeding, granting PUCT leave to construct a new 230 kilovolt (kV) transformer station ("**Tagona West TS**") and approximately 10 kilometers of 230 kV transmission line from the Third Line TS to the proposed Tagona West TS (the "**PUC Transmission Project**") near Sault Ste Marie, Ontario ("**Decision**").

The Decision included standard conditions of approval where Condition 2 stipulates that unless otherwise ordered by the OEB, authorization for leave to construct shall terminate 12 months from the date of the Decision, unless construction has commenced prior to that date ("**Condition 2**").<sup>1</sup> PUCT is writing to advise the OEB that construction on the PUC Transmission Project has commenced. PUCT is seeking OEB confirmation that the list of construction activities below related to the PUC Transmission Project satisfy Condition 2.

In EB-2020-0188, Hydro One Networks Inc.'s ("**HONI**") leave to construct approval included an identical condition to Condition 2.<sup>2</sup> HONI filed a change notification only seven days before the leave

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<sup>1</sup> EB-2023-0360, PUC (Transmission) LP and Hydro One Sault Ste. Marie LP, Leave to Construct Application, Decision and Order, August 27, 2024, Schedule B, online:  
<<https://www.rds.oeb.ca/CMWebDrawer/Record/863301/File/document>>

<sup>2</sup> EB-2020-0188, Hydro One Networks Inc., Leave to Construct Application – Power Downtown Toronto, Decision and Order, February 25, 2021, Schedule B, online:  
<<https://www.rds.oeb.ca/CMWebDrawer/Record/705387/File/document>>

to construct approval was set to terminate unless construction had commenced.<sup>3</sup> In response and noting the deadline imposed by the condition, the OEB posed several questions to HONI, including: “Has construction started?”<sup>4</sup> The OEB appeared satisfied that the following activities, as outlined by HONI, demonstrated that construction had already commenced within the time required by the condition:<sup>5</sup>

Yes, construction has started. Hydro One has completed:

1. Vacuum truck investigations of the in-ground constraints at Esplanade TS and Terauley TS
2. Environmental test wells for the Project
3. Geotechnical investigations of the tunnel route which includes drilling and taking core samples of the rock under the City streets
4. Issuing purchase orders for the tunnel construction and cable installation
5. Ordering cable raw materials through the cable installation contractor

In addition to the above, the Tunnel Contractor is progressing well with the re-build and modifications to the Tunnel Boring Machine. These modifications are required due to the project’s tunnel turning radius requirements. Photos of that work are provided as Attachment 1 for reference purposes.<sup>6</sup>

Similar to the activities described by HONI above, by August 27, 2025, PUCT will have completed or will be in progress on the following construction activities in relation to the PUC Transmission Project:

- Installation of environmental test wells on the Tagona West TS was completed in April 2025 to monitor ground water conditions.
- Geotechnical investigations were completed in Q4 2024 and Q2 2025 along the transmission line route and at Tagona West TS, involving soil samples drilling and analysis to support the design of equipment foundations.
- Purchase orders were issued in January and May 2025 for significant long lead equipment for the Tagona West TS, including 230 kV autotransformers, 230 kV breakers, and 115 kV breakers.

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<sup>3</sup> EB-2020-0188, Hydro One Networks Inc., Leave to Construct Application – Power Downtown Toronto, Change Notification, February 18, 2022, online: <https://www.rds.oeb.ca/CMWebDrawer/Record/740745/File/document>

<sup>4</sup> EB-2020-0188, Hydro One Networks Inc., Leave to Construct Application – Power Downtown Toronto, Change Notification, April 4, 2022, online: <https://www.rds.oeb.ca/CMWebDrawer/Record/744788/File/document>

<sup>5</sup> EB-2020-0188, Hydro One Networks Inc., Leave to Construct Application – Power Downtown Toronto, Response to OEB letter, April 21, 2022, online: <https://www.rds.oeb.ca/CMWebDrawer/Record/744788/File/document>; EB-2020-0188, OEB Notification Question Responses, July 26, 2022, online: <https://www.rds.oeb.ca/CMWebDrawer/Record/751943/File/document>

<sup>6</sup> EB-2020-0188, Hydro One Networks Inc., Leave to Construct Application – Power Downtown Toronto, Response to OEB letter, April 4, 2022, p. 3 online: <https://www.rds.oeb.ca/CMWebDrawer/Record/744788/File/document>

- A construction contract was awarded in April 2025 for the construction of access roads and culverts along the transmission line corridor and construction is scheduled to begin in June 2025.
- A construction contract was awarded in April 2025 for grubbing, sub-grade excavations and site preparations at the Tagona West TS with construction starting mid-June 2025.
- Tree clearing along the transmission line corridor was completed in Q1 2025.
- Approximately 3,500 meters of wildlife exclusion fencing was installed at the construction areas in Q1 2025.

Should you have any questions or require further information, please do not hesitate to contact us.

Sincerely,

**BORDEN LADNER GERVAIS LLP**



Colm Boyle

JV/CB