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July 24, 2025

## **DELIVERED BY EMAIL AND RESS**

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

Dear Mr. Murray:

Re: PUC (Transmission) LP – Application for Approval of a Standalone Security Deposit Procedure

We are legal counsel to PUC (Transmission) LP, a licenced Ontario electricity transmitter (ET-2021-0088) ("PUC Transmission").

On June 9, 2025, PUC Transmission submitted an application for approval of a standalone security deposit procedure in accordance with Schedule 2 of PUC Transmission's transmission licence and Section 6.1.3 of the Transmission System Code.

On July 23, 2025, OEB Staff raised a concern that although about the proposed security deposit procedure addressed both generation and load customer obligations, it did not expressly contemplate electricity storage customer obligations.

PUC Transmission notes that the statutory framework in Ontario does not expressly distinguish electricity storage customers from load or generation customers. A storage license is a combined authorization to generate and wholesale electricity. It is unclear to PUC Transmission why this distinction is required in its security deposit procedure if the same distinction is not required in the governing legislation.

However, rather than debating this point further, please find attached to this letter a revised draft of the security deposit procedure expressly addressing storage customers. A pdf version containing track changes is also enclosed. No other revisions to the security deposit procedure have been made.

Sincerely,

John Vellone