

**BY EMAIL AND RESS**

September 4, 2025

Mr. Musab Qureshi  
Manager of Generation & Transmission  
Ontario Energy Board  
Suite 2700, 2300 Yonge Street  
P.O. Box 2319  
Toronto, ON M4P 1E4

Dear Mr. Qureshi,

**EB-2023-0198 – Hydro One Networks Inc. Section 92 – Waasigan Project Update - Response to OEB Request for Information**

On August 13, 2025, Hydro One Networks Inc.'s ("Hydro One") wrote to the Ontario Energy Board ("OEB") to notify it of an update ("Update Letter") to the in-service date of Phase 1 of the Waasigan Project (or "Project").

On August 25, 2025, the OEB provided a letter to Hydro One acknowledging receipt of the Update Letter and sought further clarification on three matters. Hydro One's response to those questions is provided below.

**OEB Staff Question 1**

*Given the delay in Phase 1, please describe the mitigation measures Hydro One has undertaken to ensure that the estimated total cost is unchanged and that the in-service date of December 2027 is being maintained.*

**Response**

At Exhibit B, Tab 7, Schedule 1 of the Project's leave to construct application ("LTC"), Hydro One identified the top three risks associated with Hydro One's forecast cost estimate as: land acquisition, engagement and consultation as well as approvals, permits and authorizations. Hydro One understands the significance of reaching voluntary agreements with directly affected property owners – not just for the construction of a transmission line but for its continued use and operation on those lands for the life of the asset. Consequently, Hydro One places great importance and notable effort on reaching voluntary agreements predicated on good faith negotiations between the utility and landowners. Notwithstanding these efforts, as described in Exhibit B, Tab 7, Schedule 1 of the LTC as a potential mitigation, Hydro One had to seek expropriation relief from the OEB as it was unable to secure all lands for the Project voluntarily. The OEB reviewed that expropriation application under docket EB-2024-0319 and granted the relief.

Further to the expropriation relief granted by the OEB, and correlated to that relief, Hydro One has implemented other mitigation measures to ensure that the estimated total cost is unchanged and that the in-service date of December 2027 is being maintained. Notably, Hydro One recently executed an application

to the Ontario Superior Court (the “Court”) for relief under s.39(3) of the Expropriation Act (1990)<sup>1</sup> (the “Act”) seeking authorization to shorten the legislated 90-day notice of possession period (“Notice of Possession Period”) required by the Act. The Court, on August 22, 2025, subsequently granted the relief sought by Hydro One. The standard Notice of Possession Period would have otherwise protracted the time required to initiate construction activities specifically on the lands over which Hydro One has been granted expropriation relief. The shortening of the Notice of Possession Period will allow Hydro One to start construction – on those OEB-approved expropriated lands - by September 22, 2025. If Hydro One had not been able to commence construction on those expropriated lands by this date it may have increased the risk of additional Project cost and schedule delay but given Hydro One’s efforts, that is not the case. As mentioned in the Update Letter, although the schedule for Phase 1 has been modified the application of contingency plans and efforts in finding efficiencies for project delivery has ensured that the forecast cost to deliver the Project remains unchanged from that provided in the Project’s leave to construct application.

Hydro One continues to assess and monitor risks for the Project during construction and implement mitigation measures, such as contingency plans, should the risk materialize in part or in whole. Through extensive collaboration by the Project team, including the EPC contractor, Project contingency plans continue to be implemented to reduce impacts to cost and or schedule.

## **OEB Staff Question 2**

*Please provide further details on which approvals, permits and authorizations for the project are still outstanding.*

- a) Please provide the reason for the delay in obtaining each outstanding approval, permit and authorization.*
- b) For each outstanding approval, permit and authorization please provide the estimated timeline for completion.*

## **Response**

Table 1 below presents the outstanding permits for both Phase 1 and Phase 2 of the Project. At this time the three remaining permits for Phase 1 do not represent a risk to the in-service date of Phase 1. The Land Use Permit is required for Hydro One to occupy a specific small section of right-of-way that consists of Crown land. The aerial crossing permits represent authorizations to cross railways with overhead wires at two specific locations along the right-of-way.

There are currently no Phase 2 approvals, permits, and authorizations that are delayed. The Project’s overall in-service date remains December 2027 consistent with EB-2023-0198<sup>2</sup>.

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<sup>1</sup> [Expropriations Act 1990](#)

<sup>2</sup> EB-2013-0198, Exhibit B, Tab 11, Schedule 1.

**Table 1 - Summary of Project Permits Outstanding**

<b><u>Name of Approval, Permit, Authorization (Quantity)</u></b>	<b><u>a) Reason for delay</u></b>	<b><u>b) Target Completion</u></b>
Phase 1 Land Use Permits (Quantity = 1)	Stakeholder opposition	October 2025
Phase 1 Aerial Crossing Permits (Quantity = 2)	Agreement processing	September 2025
Phase 2 Contractor Work Permits	N/A – on schedule	2025-2027 Applications sequenced per schedule
Phase 2 Archaeology clearance	N/A – on schedule	June 2026
Phase 2 Land Use Permits (Quantity = 1)	N/A - on schedule	Mid-September 2025
Phase 2 Expropriation Authority Application	N/A – on schedule	September-2025

**OEB Staff Question 3**

*As part of the standard conditions of approval, Hydro One is required to, “advise the OEB of any proposed material change in the project, including but not limited to changes in: the proposed route, construction schedule, necessary environmental assessment approvals, and all other approvals, permits, licences, certificates and rights required to construct the project.”. Please confirm whether there has been any other material change for the Waasigan Project.*

**Response**

Aside from the information outlined above, and in Hydro One’s Update Letter, there has been no other material change for the Waasigan Project.

Hydro One will continue to keep the OEB informed of any further material updates to the Project.

Sincerely,



Pasquale Catalano

Cc: OEB Registrar

Cc: Beverly Nollert - IESO Director, Transmission Planning