



Perimeter Forest

624 Huron Terrace
Kincardine, Ontario
CANADA N2Z 2H2

BY EMAIL AND COURIER (with copy to Ontario Energy Board)

August 23, 2023

To: Carla Molina – Hydro One Networks Inc., Senior Regulatory Coordinator

EB-2023-0061 – Hydro One Sault Ste. Marie – Sault #3 Transmission Line Refurbishment

I am writing in response to your letter of Notice dated July 28, 2023.

PERIMETER FOREST LIMITED PARTNERSHIP (PFLP) applied to the Ontario Energy Board (OEB) for intervenor status and was granted by way of Procedural Order No.1 dated August 18, 2023 intervenor status. A copy of Procedural Order No. 1 is attached for your convenience.

PERIMETER FOREST LIMITED PARTNERSHIP, by its general partner, PERIMETER FOREST GP INC. owns and manages 147,882 (+/-) acres of forest property through which the Sault #3 transmission line under consideration for refurbishment traverses the PFLP property.

Be advised that we did not request cost eligibility but, as outlined in Procedural Order No. 1, “The OEB will allow PFLP to apply for an award of costs under the OEB’s Practice Direction on Cost Awards”.

Our property is being operated under an improved forest management protocol with the intention to foster forest growth thereby promoting carbon sequestration and biodiversity. In addition, our property is pursuing and will be under Forest Stewardship Council (FSC) certification. For the following reasons we request early engagement directly with Hydro One Sault Ste. Marie:

- Cutting or brushing could negatively impact our property, business model, and FSC compliance.
- We maintain an extensive network of roads throughout the property and are concerned that construction traffic will cause damage to the road infrastructure thereby inflicting unexpected and excessive costs to PFLP.
- We need to understand if modifications to our roads are necessary to accommodate the project, and if so, the location of these modifications and HOSSM’s intention to refurbish and ensure FSC compliance.
- We have a number of gravel pits that may be of interest to HOSSM. We are amenable to discussing the project’s needs, perhaps mitigating costs for gravel haulage from more distant sources of gravel.
- We host some 240 lessees with recreational camps throughout the property. Road safety during the planning and execution stages of the refurbishment project is paramount.



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- We need to understand HOSSM's fire safety protocol including emergency preparedness.
- If the project requires use of our lands and roads, we will require indemnification from any liabilities.

In closing, PFLP is unsure of the material impacts to our property and our lease holders. As such, we need to better understand the project in terms of safety, and physical and financial impacts to our property. We respectfully request the establishment of a collaborative working relationship with HOSSM well in advance of any construction related activities.

I look forward to hearing from a representative of the project from Hydro One Networks Inc. or Hydro One Sault Ste. Marie such that we can commence meaningful collaboration with respect to the Sault #3 line refurbishment project.

Sincerely,

Hugh Campbell

Chief Administrative Officer

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p. (519) 385 5500

- cc.
- Shelly Connell- Regulatory Administrator, Ontario Energy Board (registrar@oeb.ca)
 - Philipp Andres- CEO, Perimeter Forest Limited Partnership (pandres@perimeterforest.com)
 - Daniel Andres- COO, Perimeter Forest Limited Partnership (dandres@perimeterforest.com)
 - David Hermans- CFO Perimeter Forest Limited Partnership (hermans@perimeterforest.com)
 - Mark Balogh- Manager of Lands, Perimeter Forest Limited Partnership (mbalogh@perimeterforest.com)