



# Perimeter Forest

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BY EMAIL

September 19, 2023

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto ON M4P 1E4

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

In accordance with Procedural Order No. 1 please find attached Perimeter Forest Limited Partnership's interrogatories for the above proceeding.

Yours sincerely,

Hugh Campbell

Special Consultant to Perimeter Group of Companies

**Perimeter Forest Limited Partnership Interrogatories**  
**Hydro One Sault Ste. Marie Limited Partnership**  
**EB-2023-0061**

Preamble:

Reference our letter to Carla Molina – Hydro One Networks Inc., Senior Regulatory Coordinator dated August 23, 2023.

Perimeter Forest Limited Partnership (PFLP), by its general partner, Perimeter Forest GP Inc. owns and manages 147,882 (+/-) acres of forest property including the Townships of Larson (part of), Loach (part of), Home (part of), Raaflaub, Tolmonen, Tronsen, Vibert, Davieaux and Desbiens (part of). The Sault #3 transmission line refurbishment project under consideration traverses the PFLP property, specifically through the Townships of Home, Tolmonen and Tronsen.

The PFLP property is 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.

In 2016, prior to PFLP's ownership, the then-owner Algoma Timberlakes Corporation granted Great Lakes Power Holding Corp. an easement (Easement) into perpetuity allowing for the use and maintenance of the electricity transmission line corridor. Through a name change and establishment of partnership the grantee is now Hydro One Sault Ste. Marie LP (HOSSM). The Easement does not grant HOSSM rights to natural resources within the Easement, these remain the property of PFLP.

PFLP maintains an extensive network of roads throughout the property and is concerned that construction traffic will cause damage to the road infrastructure thereby inflicting unexpected and excessive costs to PFLP. Additionally, PFLP hosts some 240 lessees with recreational camps throughout the property. Road safety and fire mitigation during construction execution of the refurbishment project are paramount.

Questions:

- a) Cutting or brushing could negatively impact PFLP's property, business model, and FSC compliance. Will HOSSM be needing to do any brushing beyond reasonable normal transmission line maintenance activities?
- b) PFLP has several natural gravel pits local to the project that may be of interest to HOSSM. PFLP is amenable to discussing the project's needs, perhaps mitigating costs for gravel haulage from more distant sources of gravel and thereby reducing wear and tear on PFLP's road infrastructure. Will HOSSM have a need for gravel resources from within the Easement or within the PFLP property boundary?
- c) PFLP continues to expend significant financial resources on maintenance of its road infrastructure. Without the benefit of understanding HOSSM's construction execution plan but with consideration of the topography and natural water features within the Easement area, it seems reasonable that HOSSM will require use of PFLP's roads. Would HOSSM describe the extent to which it will need use of PFLP's road network?
- d) Will modifications to PFLP's roads be necessary to accommodate the project, and if so, would HOSSM identify the location of these modifications and HOSSM's intention to refurbish post construction?
- e) PFLP hosts some 240 lessees with recreational camps throughout the property. Road safety during the planning and execution stages of the refurbishment project is paramount. Assuming HOSSM will need to use our road network, would HOSSM please describe safety protocols that will be implemented and maintained during the transmission line refurbishment project?
- f) Given the nature of PFLP's business and inherent need to protect our forest assets and lessees, would HOSSM describe its fire safety protocol including emergency preparedness?
- g) PFLP will require indemnification from any and all liabilities associated with the transmission line refurbishment project. Would HOSSM acknowledge and confirm?