

Feedback Form

Toronto Third Line – August 20, 2026

Feedback Provided by:

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Title: Planning and Development Lead

Organization: Studios of America Corporation c/o Cortel Group

Email: [REDACTED]

Date: September 6, 2026

To promote transparency, feedback submitted will be posted on the [Toronto Third Line engagement page](#) unless otherwise requested by the sender.

- ☐ Yes – there is confidential information, do not post
- ☒ No – comfortable to publish to the IESO web page

The Independent Electricity System Operator (IESO) is seeking feedback from Indigenous communities and stakeholders on the Contract Draft #1 document and Preliminary System-Level Requirements. The materials can be accessed from the [Toronto Third Line engagement webpage](#).

Note: The IESO will accept additional materials where it may be required to support your rationale provided below. When sending additional materials please indicate if they are confidential.

Please submit feedback to engagement@ieso.ca by September 10, 2026.

Please respond only to the questions that are relevant to your expertise, or interest. There is no expectation to answer every question.

Indigenous Engagement and Participation Commitments

Question 1: What contract parameters should the IESO include to ensure accountability for Indigenous engagement and participation commitments (e.g., ongoing monitoring and reporting, line-in-service verification)?

Contract and Regulatory Framework

Question 2: Do you have feedback on the proposed contract framework and its interaction with the existing regulatory framework, including IESO payments and the transition to OEB rate regulation?

Please see enclosed letter.

Website Obligations

Question 3: To increase transparency through the development and construction of the project, the IESO is proposing to include a number of Website Obligations in the Contract. Do you have any feedback on the proposed inclusions?

Milestone Deliverables

Question 4: Is there feedback regarding the deliverable expectations for the milestones? Are the requirements appropriate? Are there any submissions omitted from the current list?

Please see enclosed letter.

Contractual Milestone Dates

Question 5: The IESO is considering how to leverage transmitter's expertise in schedule development, while balancing the IESO's need to ensure appropriate milestone dates are included in the contract. Do you have suggestions on an approach that enables transmitters to offer appropriate input into the determination of contractual milestone dates?

Preliminary System-Level Requirements

The IESO is seeking feedback on the requirements shared on the presentation slides 42-48 including:

Question 1: Are the preliminary system-level requirements outlined on slide 44 to 46 adequate to drive the technical design of the TTL?

Please see enclosed letter. The IESO should focus on public land to support the future design.

Question 2: Are the preliminary requirement values appropriate, overly stringent, or too relaxed to for current and expected technology capabilities?

Please see enclosed letter.

Question 3: What additional clarification is required regarding the system-level requirements and associated values?

Please see enclosed letter.

Question 4: Are there any additional system level requirements that the IESO should consider?

Please see enclosed letter. The IESO should focus on public land to support the future design.

General Comments / Feedback

Please use this section to provide any additional comments that may not be captured in the questions above.

Please see enclosed letter.

VIA EMAIL

September 6, 2026

Independent Electricity System Operator ('IESO')
1600-120 Adelaide Street West
Toronto, ON M5H 1T1

Dear members of the IESO Toronto Third Line Team,

RE: Toronto Third Line Project – August 20, 2026 Public Consultation

Further to the August 20, 2026, Public Engagement Session hosted by the IESO, we are pleased to submit this letter on behalf of Studio of America Corporation, the owners of 402 and 440 Unwin Avenue in the City of Toronto.

Our 402 and 440 Unwin Avenue site comprises more than 30 acres and is located immediately adjacent to the Port Lands Energy Centre ("PEC"), a natural gas-fired power plant and a significant source of carbon emissions. The site is also home to the decommissioned Richard L. Hearn Generating Station, which is slated for continued investment and redevelopment as part of the broader redevelopment of the site.

As outlined further below, we were surprised to learn at the August 20th meeting that, while the IESO has engaged Hydro One to conduct a connection feasibility assessment, land use and land ownership—including the potential costs and protracted timelines associated with expropriation—were not factored into the assessment of feasible connection arrangements.

Background

As you are aware, all three levels of government have invested more than \$2 billion to date in the regeneration and redevelopment of the approximately 715-acre Port Lands waterfront district, representing one of the largest urban renewal projects in North America. While respecting the existing Port uses and the extensive network of parks and open spaces, mixed-use development supporting a diversity of land uses and new housing, including tall buildings, is being introduced throughout the Port Lands.

Consistent with its current land use designation as a "Destination and Catalytic District," the 402 and 440 Unwin Avenue site presents an extraordinary opportunity to create a world-class destination on Toronto's waterfront. Our vision for the site is grounded in celebrating the Hearn building while providing for a mix of uses, including residential, cultural and commercial uses, as well as the population required to support the dynamic programming and community amenities envisioned for the site. We have also protected for the potential extension of higher-order transit to the site and surrounding area.

The current PEC configuration constrains the vision for our site, the Port Lands and Toronto's eastern waterfront as a whole. We welcome solutions that can accommodate growth in Toronto and the Greater Toronto Area while improving grid resilience, diversifying supply sources, and alleviating capacity constraints across the Province.

“Toronto Third Line” Project

As the Port Lands and the City of Toronto continue to grow, we believe that the planned underwater transmission line is a critical piece of enabling infrastructure to support continued investment, innovation and economic strength. We understand that, on January 7, 2026, the Government of Ontario announced its intent to proceed with this underwater transmission project and directed the IESO to launch a competitive procurement process to ensure a transparent and cost-effective approach to selecting the transmitter responsible for designing, building and operating the line.

Following this announcement, the IESO has hosted several consultation events, including the public meeting held on August 20th. At that meeting, we heard that the IESO has engaged Hydro One to conduct a connection feasibility assessment. However, to our surprise, land use and land ownership—including the potential costs and protracted timelines associated with expropriation—does not appear to have been factored into the assessment of feasible connection arrangements.

Unlike many other locations in the City of Toronto, a significant portion of the Port Lands is publicly owned. Accordingly, greater consideration should be given to who owns the land and the approved/proposed use of the lands to support the Toronto Third Line Project. The connection feasibility assessment should focus on solutions that are not only technically feasible, but also practical, implementable and capable of being delivered within a reasonable timeframe and budget.

Please see the enclosed Hearn Context Map, which we believe will be helpful in informing discussions regarding the Toronto Third Line Project. As illustrated on the map, significant land areas to the east and south of the Port Lands Energy Centre, as well as lands on the north side of the Ship Channel, are publicly owned and could potentially accommodate infrastructure connecting to the Hydro One substation.

Recognizing that the IESO is advancing a detailed and thorough procurement process, we strongly encourage the IESO to prioritize connection feasibility options that focus on utilizing public lands. Doing so could help limit project delays and increased costs associated with a potentially protracted expropriation process. Focusing on public lands for the Toronto Third Line Project will also allow greater flexibility to the future design process.

Additionally, it is our opinion that preparing a connection feasibility assessment without fully considering the surrounding land use context and ownership does not provide prospective transmitters/bidders with the complete information necessary to develop feasible and implementable connection solutions, which is the ultimate objective of this process.

We are also unclear if the IESO has considered decommissioning the existing Hydro One Switching Yard and building an efficient new facility on public land where the Toronto Third Line Project new cables can more easily connect and respond to the urban vision for the area?

We appreciate the opportunity to provide the above feedback and would welcome the opportunity to discuss these matters further. Please do not hesitate to contact us should you have any questions or require any additional information.

Sincerely,
Studios of America Corporation



Elisa Fancello, Cortel Group



Hearn Context -Legend

- | | | | |
|----------|---|---|--|
| 1 | Hearn Site (Privately Owned and Approx. 33 Acres) | 8 | Vacant OPG Owned Lands (Approx. 10 Acres) |
| 2 | (TPLC) – Dockwall Long-Term Lease to Studios of America | 9 | GFL Leased Lands (City Owned and Approx. 17 Acres) |
| 3 | (TPLC) – 99 Year Lease to OPG | 10 | Pinewood Toronto Studios Lease Lands (City owned and Approx. 30 Acres) |
| 4 | Hydro One – Switching Yard | 11 | Toronto Hydro Substation |
| 5 | OPG Lands | 12 | Vacant City of Toronto Lands (Approx. 10 Acres) |
| 6 | Portlands Energy Centre | 13 | Vacant Privately Owned Lands (Approx. 5 Acres) |
| 7 | Vacant OPG Owned Lands (Approx. 5 Acres) |  | Shared Access Easement |