



WAASIGAN TRANSMISSION LINE PROJECT COMPLAINT PROTOCOL

Environmental Assessment Reference Number 16055

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1.0 Introduction

1.1 Description of the Undertaking

We wish to acknowledge that the Waasigan Transmission Line Project (the Waasigan Project) is located within lands that represent the traditional territories and homelands of the Robinson-Superior Treaty (1850) and Treaty #3 (1873) First Nations and traverse the Red Sky Métis Independent Nation, Northwestern Ontario Métis Community, and Northern Lake Superior Métis Community.

Hydro One Networks Inc. (Hydro One), in partnership with nine First Nations, has retained Valard Construction to build the Waasigan Project. The Waasigan Project is a new transmission line connecting transformer stations in the Municipality of Shuniah, the Town of Atikokan, and the City of Dryden. This critical infrastructure will increase the power transfer capability to support the growth of businesses and communities in Northwestern Ontario.

The Ontario Ministry of the Environment, Conservation, and Parks (MECP) approved the environmental assessment of the Waasigan Project on September 27, 2024. The Minister's decision was documented in a Notice of Approval under the Ontario *Environmental Assessment Act (1990)*, and the approval was conditioned to several requirements. One such requirement is Condition 6, which mandates Hydro One to develop and submit a protocol outlining how concerns related to the Waasigan Project will be addressed.

This document presents the Waasigan Project Complaint Protocol (the Protocol) developed to satisfy Condition 6 of the Notice of Approval of the Waasigan Transmission Line Project Amended Environmental Assessment. Upon approval by MECP's Director of the Environmental Assessment Branch, the document will be made available to the public on Hydro One's Waasigan Project website.

1.2 Scope

The Protocol is a living document that outlines how complaints, otherwise referred to as concerns for the purpose of this document, about the Waasigan Project from public stakeholders and Indigenous community members will be addressed. The Protocol will be reviewed annually, at a minimum, and updated as required.

Once constructed and placed in service, concerns received will be governed by Hydro One's standard corporate practices, policies and guidelines.

1.3 Purpose and Background

The following conditions from the Notice of Approval were considered in the development of the Protocol:



6. Complaint Protocol

- 6.1 *The Proponent shall prepare and implement a complaint protocol for dealing with and responding to inquiries and complaints related to the Project. The complaint protocol shall include a procedure for notifying the MECP Thunder Bay District and Kenora District Managers of any complaints received by the Proponent.*
- 6.2 *The Proponent shall submit the complaint protocol to the Director (of MECP's Environmental Assessment Branch) for approval and for the public record at least 30 days before the start of construction or such other date that is agreed upon by the Director in writing.*
- 6.3 *The Director (of MECP's Environmental Assessment Branch) may require the Proponent to amend the complaint protocol at any time and shall provide notice of the required amendment and deadline for completion in writing to the Proponent. The Proponent shall submit an amended complaint protocol to the Director by the deadline specified in the notice.*
- 6.4 *The Proponent shall implement the complaint protocol and any amendments to it.*
- 6.5 *The approved complaint protocol and any amended complaint protocol shall be included as part of the public record.*
- 6.6 *The Proponent shall include a summary of the complaints received and how they were addressed in each of the annual compliance reports required to be submitted by Condition 5.*

To meet these conditions, this Protocol defines how concerns will be received and processed and identifies the key Project personnel involved in addressing concerns.



2.0 Roles and Responsibilities

Table 2-1 describes key personnel responsible for implementing the Protocol.

Table 2-1: Key Personnel and Responsibilities

Title or Position	Responsibilities
Complaint Management System (CMS) Administrator	<ul style="list-style-type: none">• Develops the Protocol and related processes.• Receives, manages and tracks all concerns received and ensures all the required information is documented in the CMS.• Assigns a unique identifier to concerns for tracking purposes.• Notifies the MECP's Thunder Bay and Kenora District Managers about concerns received.• Requests recommendations from Hydro One's Construction, Indigenous Relations, Community Relations, Environmental, or Real Estate managers, as applicable.• Receives and documents recommendations proposed by managers to address concerns.• Responds to inquiries on the status of concern(s) received.• Compiles all concerns received to support the preparation of the Annual Compliance Report.
Hydro One's Project Manager	<ul style="list-style-type: none">• Approves the Protocol.• Approves the recommended approach to address high-priority concerns.
Construction Manager, Indigenous Relations Manager, Community Relations Manager, Environmental Manager, and Real Estate Manager	<ul style="list-style-type: none">• Support implementing and complying with the Protocol and environmental permits, regulations, commitments and best management practices.• Review concerns assigned by the CMS Administrator and conduct necessary investigations.• Escalate the priority of a concern assigned, as applicable.• Make recommendations for addressing low and medium-priority concerns.



Title or Position	Responsibilities
	<ul style="list-style-type: none"> • Identify the need for and request technical or legal advice, as applicable. • Make recommendations for addressing high-priority concerns to Hydro One's Project Manager.
Technical Specialists	<ul style="list-style-type: none"> • Provide technical and strategic advice to make recommendations for addressing concerns to Hydro One's Construction, Indigenous Relations, Community Relations, Environmental, and Real Estate managers, as applicable.
Legal Counsel	<ul style="list-style-type: none"> • Provides legal advice to address concerns, as applicable. • In collaboration with Project management, addresses and closes out concerns presented by Hydro One's Project Manager.



3.0 Waasigan Project Complaint Protocol

Hydro One will manage, address and document complaints, otherwise referred to as concerns for the purpose of this document, received during the construction of the Waasigan Project. To achieve these objectives, Hydro One developed this Protocol, which:

- Describes the process to receive, manage, and address concerns;
- Identifies the personnel involved in addressing concerns; and,
- Outlines the roles and responsibilities of the personnel involved in its implementation.

As the Project proceeds, the Protocol will be reviewed annually and may be revised to reflect any changing communication requirements to the extent practicable.

The Protocol process is shown in Figure 3-1 below and is explained in the following sections.



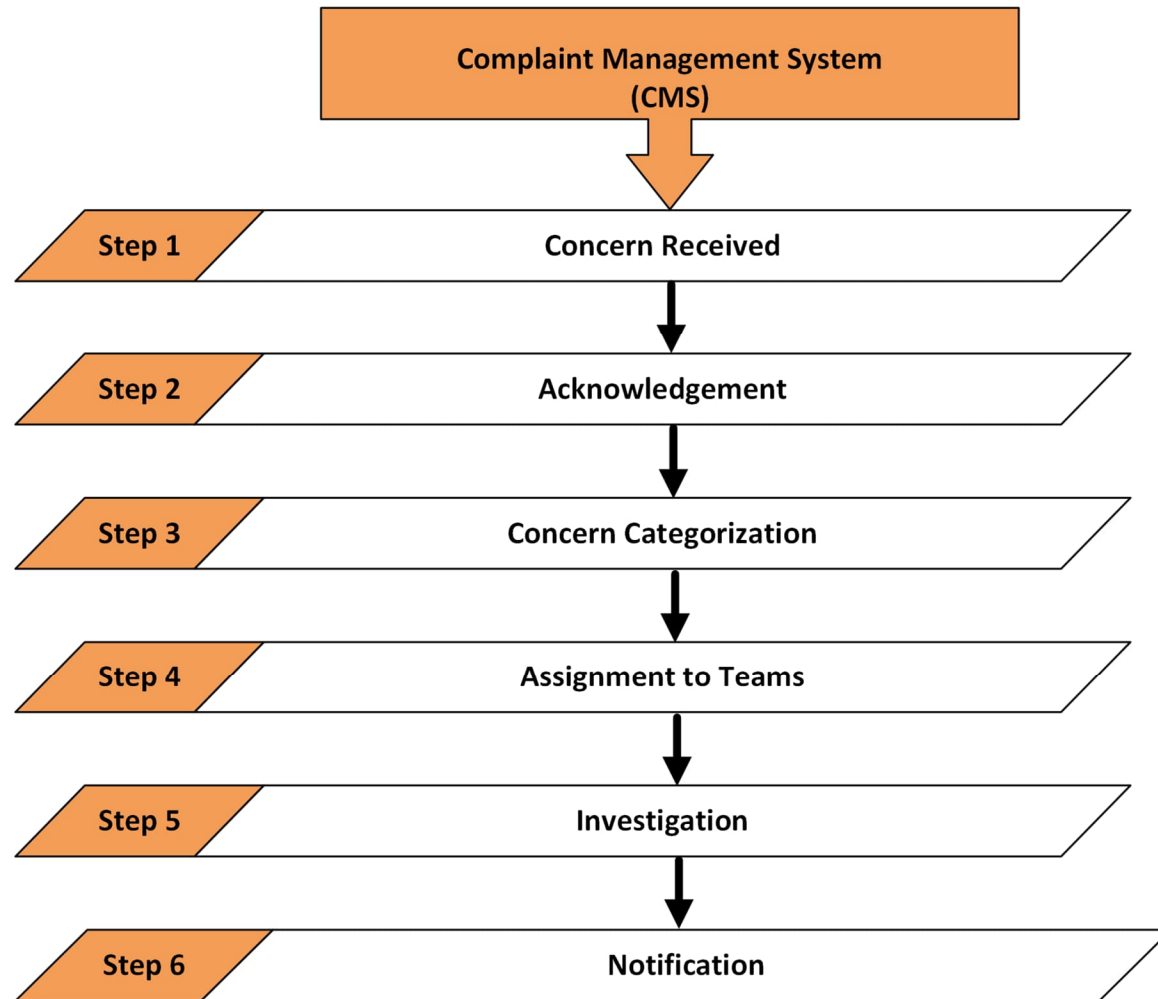


Figure 3-1: Diagram of the Waasigan Transmission Line Project Complaint Protocol

3.1 Protocol Steps

3.1.1 Step 1 - Concern Received

Concerns will be received by Hydro One and recorded in a Complaint Management System (CMS). Concerns may be received via multiple channels including, but not limited to, a dedicated email address, telephone line, and in-person at community events.

The primary method of contacting Hydro One about a concern is by email or telephone, available on the Waasigan Project's website. Upon receipt of a concern, the following information will be documented:

- Name
- Contact Information
- Date Received
- Concern Description

The CMS Administrator will work with public stakeholders and Indigenous community members to ensure all applicable information is provided and make the best efforts to address the concerns raised.

3.1.2 Step 2 - Acknowledgement

The CMS Administrator or other representative will acknowledge the concern received directly or through an automated reply for electronic submissions. If needed, the acknowledgment will be used to gain clarity from the stakeholder or request further information.

3.1.3 Step 3 - Concern Categorization

The CMS Administrator will review each concern received, categorize its priority, and assign it to applicable personnel, as described in Section 2.1, depending on the nature of the concern. Concerns will generally be categorized as follows:

- Low Priority: includes events or observations representing a potential future or uncertain threat to the environment, rightsholders, stakeholders, or the Waasigan Project.
- Medium Priority: includes events or observations representing a near-term threat or moderate to the environment, rightsholders, stakeholders, or the Waasigan Project.
- High Priority: includes events or observations that represent an immediate or significant threat to the environment, rightsholders, stakeholders, or the Waasigan Project.



3.1.4 Step 4 - Assignment to Teams

After assessing the priority of the concern received, the CMS Administrator will assign it to applicable personnel, as follows:

- Hydro One's Construction Manager: construction-related concerns.
- Hydro One's Indigenous Relations Manager: concerns involving the rights and interests of Indigenous communities and peoples.
- Hydro One's Community Relations Manager: concerns involving community engagement, public relations, and social impacts.
- Hydro One's Environmental Manager: Concerns involving the natural environment.
- Hydro One's Real Estate Manager: concerns from private property owners and involving real estate matters.

The CMS Administrator will provide each manager with all available information about the concern, including their priority level. However, managers can escalate the priority level of inquiries or concerns, as applicable, upon notification to the CMS Administrator.

3.1.5 Step 5 - Investigation

The assigned manager will investigate each concern, which may involve further engagement with the stakeholder, site visits, interviews, reviews of relevant documentation, and consultation with technical specialists and legal counsel. Once the investigation is completed, the manager will recommend appropriate actions to address the concern to the CMS Administrator. Hydro One's Project Manager will also have the opportunity to review and approve proposed recommendations to address high-priority concerns and as otherwise required.

3.1.6 Step 6 - Notification

When necessary, the CMS Administrator will inform the stakeholder about reasonable approved recommendation(s) to address the concern. The concern will be documented and closed out upon implementation of the approved recommendation. If a stakeholder is not amenable to the recommendation to address the concern, the CMS Administrator will work with the Project Manager and applicable personnel to identify and propose a reasonable alternative recommendation, if appropriate.

Once a concern is addressed, the CMS Administrator will verify that all communications related to the concern are documented and close out the record.



3.2 Inquiries

Inquiries can be submitted about the status of a concern raised by contacting Hydro One. The CMS Administrator will receive and document all inquiries. Then, the CMS Administrator will acknowledge and provide an update on the status of the concern, as applicable.

3.3 Reporting

The CMS Administrator will prepare monthly reports to notify the MECP's Thunder Bay and Kenora District Managers of all concerns received during the previous calendar month.

The CMS Administrator will also prepare an annual summary describing all concerns received and how they were addressed, as per Condition 6.6 of the Waasigan Project's Notice of Approval. This summary will be submitted to the Director of the Environmental Assessment Branch of the Ministry of the Environment, Conservation, and Parks as part of the Annual Compliance Report required by Condition 5 of the Notice of Approval.



4.0 Protocol Amendments

The Director of the Environmental Assessment Branch of the MECP may request Hydro One to amend this Protocol at any time according to Condition 6.3 of the Notice of Approval. If such a request is made, Hydro One will amend the Protocol accordingly and submit it for the Director's review before the specified deadline.

Hydro One will implement the approved Amended Protocol and include it on the Waasigan Project's public record and website.





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