The proposed Project and its connections to the PJM and ESO systems will be designed, constructed and operated in compliance with applicable NERC reliability standards or other applicable reliability standards, and will meet the requirements of NERC General Order M3-002-2012 and NERC General Order on Reliability Standards. The extent that the Project facilities are deemed to be Critical Infrastructure the facilities will be designed, constructed and operated to meet all applicable Critical Infrastructure Protection requirements as defined by NERC or any other applicable standards authority.

The proposed Project shall comply with all regulations in effect during construction, operation, and decommissioning.

The Project will ensure contractors and their employees or subcontractors are qualified to begin work and will inspect the contractor’s work to ensure compliance with all regulatory requirements, and any additional commitments required under the terms and conditions of the NEB Application.

Condition Compliance

The Project Lake Erie shall comply with all of the conditions contained in this Certificate unless the Board otherwise directs.

Implementation of all Commitments

The Project Lake Erie shall implement or cause to be implemented all of the policies, practices, mitigative measures, recommendations, and procedures for the protection of the environment and promotion of safety referred to in its Application, or as otherwise agreed to in its related submissions.

The Project Lake Erie shall cause the approved Project to be constructed, operated, and maintained in accordance with the specifications, standards and other information referred to in its Application or as otherwise agreed to in its related submissions.

Mitigation of Protection Modifications

The Project Lake Erie shall seek approval from the Board of any proposed modification to the Project Lake Erie electrical system before any modification is made.

The Project team will continue to engage in discussions with Aboriginal groups and their respective communities throughout the Project, with varying degrees of engagement depending on the interests of potentially impacted Aboriginal groups and their respective consultation protocols.

The Project has committed to continued engagement with the Six Nations of the Grand River and the Mississaugas of the New Credit First Nation, to identify potentially beneficial employment and economic opportunities, where available.

Updates on engagement activities will be provided through the regulatory process by way of supplementary filings.

ITC has committed to continued engagement with the Six Nations of the Grand River and the Mississaugas of the New Credit First Nation, to identify potentially beneficial employment and economic opportunities, where available.

The Project will continue to engage with Crown agencies to assess how it can appropriately assist the Crown in carrying out its obligations.

Converter Station lighting design will avoid illuminating the woodland, so roosting bats will not be exposed to artificial light.

Drinking water for the Haldimand Converter Station will be hauled to the site and stored in a cistern.

The Project will be designed to address potential for effects from atmospheric deposition. The proposed Project and its connections to the PJM and IESO systems will be designed, constructed and operated in compliance with applicable NERC reliability standards or other applicable reliability standards, and will meet the requirements of NERC General Order M3-002-2012 and NERC General Order on Reliability Standards. The extent that the Project facilities are deemed to be Critical Infrastructure the facilities will be designed, constructed and operated to meet all applicable Critical Infrastructure Protection requirements as defined by NERC or any other applicable standards authority.

ITC Lake Erie will use an emergency diesel generator that meets MOECC requirements. D ITC LEC Project Team Future Action APP, IR §6.2.1.8, p 6-47

ITC Lake Erie shall comply with all of the conditions contained in this Certificate unless the Board otherwise directs.

To date, no significant concerns regarding NARM have been received from the public. Should any comments or concerns be received, ITC Lake Erie will develop appropriate responses.

If [it] will purchase a Canadian property policy that will cover only Canadian assets and business income at limits and deductibles appropriate to the Project. These limits and deductibles have not yet been determined. No assets other than those related to ITC Lake Erie will be covered by this policy. It is expected that liability coverages for ITC Lake Erie (including any Directors and Officers) will be added to existing corporate policies, and the cost for these policies will be allocated to the Project.

Acquisition required in advance of construction will be completed in advance of the scheduled start of construction, including receipt of the Land Use Permit from the Ministry of Natural Resources and Forestry (MNRF). Following completion of the installation of the underwater HVDC cable, the MNRF process for the long-term easement of the transmission right of way would be completed based on a survey of the ‘as built’ location of the cable.

Permanent tenure on the Lake Erie seabed for the underwater HVDC cable alignment will be sought in accordance with the MNRF approval and deposition processes.

As the PJM Facilities Study is not complete, PJM has not issued ITC Lake Erie the draft Interconnection Services Agreement (ISA). Under the PJM Tariff, the draft ISA will be issued to ITC Lake Erie when the facilities study is complete and an electrical interconnection is identified.

ITC Lake Erie will continue to engage with Crown agencies to assess how it can appropriately assist the Crown in carrying out its obligations.

The Project Lake Erie shall seek approval from the Board of any proposed modification to the Project Lake Erie electrical system before any modification is made.

The Project has committed to continued engagement with the Six Nations of the Grand River and the Mississaugas of the New Credit First Nation, to identify potentially beneficial employment and economic opportunities, where available.

Updates on engagement activities will be provided through the regulatory process by way of supplementary filings.

ITC Lake Erie will continue to engage with Crown agencies to assess how it can appropriately assist the Crown in carrying out its obligations.

To date, no significant concerns regarding NARM have been received from the public. Should any comments or concerns be received, ITC Lake Erie will develop appropriate responses.

ITC Lake Erie will ensure contractors and their employees or subcontractors are qualified to begin work and will inspect the contractor’s work to ensure compliance with all regulatory requirements, and any additional commitments required under the terms and conditions of the NEB Application.

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ITC Lake Erie shall comply with all of the conditions contained in this Certificate unless the Board otherwise directs.

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The Project Lake Erie shall cause the approved Project to be constructed, operated, and maintained in accordance with the specifications, standards and other information referred to in its Application or as otherwise agreed to in its related submissions.

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The Inadvertent Returns Plan will be included in the Horizontal Directional Drilling (HDD): Contingency Plan and Emergency Plan and provided to the NEB [by June 24, 2016].

ITC will provide a list of topics that will be covered by its training program to the Board during the hearing process.

The requested draft Environmental Protection Plan will be prepared and submitted to the NEB by June 24, 2016.

If the results of the additional geotechnical assessment of the lakebed sediments and cable risk assessment require a change to the proposed HVDC cable route, an updated route will be provided to the NEB as Attachment 4 on June 24, 2016 provides detailed soil stratigraphy in the area along the anticipated HDD trajectory and drill path. Additional detail on soil stratigraphy along the drill path will be provided to the NEB when the final drill path is determined during detailed design.

The final HDD drill path will be determined during detailed design and will be provided to the NEB when complete.

Lab results for borehole samples along the cable route will be provided to Environment and Climate Change Canada upon issuance of the results to the NEB.

The Preliminary Geotechnical Report on the Canadian cable route in Haldimand County will be provided to the NEB on July 6, 2016.

The geotechnical analysis (Preliminary Geotechnical Report Lake Erie HVDC Project – Canadian Shore-line Horizontal Directional Drilling, Haldimand County, Ontario) submitted to the NEB as Attachment 4 on June 24, 2016 provides detailed soil stratigraphy in the area along the anticipated HDD trajectory and drill path. Additional detail on soil stratigraphy along the drill path will be provided to the NEB when the final drill path is determined during detailed design.

The HVDC cable system will be protected by high-speed protection systems located at the two converter stations. The 500 kV AC cable system and interconnection facilities will be protected by high-speed protection systems located at the Haldimand Converter Station and the Nanticoke TG switchyard and will be designed in accordance with the requirements of Hydro One.

The schematic of the converter’s protection system, primary and back-up protective devices, circuit breakers, and metering devices will be addressed during detailed design. The final detailed design for the Project is expected to be completed by early 2019 under the current Project schedule, and will be provided to the [National Energy Board] at that time.

The type of protections and protected items on the DC side and protections units for HVDC systems (converter) will be addressed as part of the detailed design which is expected to be completed by early 2019 under the current Project schedule, and will be provided to the [National Energy Board] at that time.

The geotechnical analysis was completed as part of the Preliminary Geotechnical Report submitted to the NEB on June 24, 2016, and included the results of the geotechnical assessment of the lakebed sediments and cable risk assessment. Additional detail on soil stratigraphy along the drill path will be provided to the NEB when the final drill path is determined during detailed design.

A detailed consultation plan will be developed during detailed engineering.
ITC Lake Erie will include compliance monitoring as part of the EPP associated with the Project including inspection, monitoring, and follow-up. Existing Best Management Practices, approved and confirmed by an officer of ITC Lake Erie that all necessary documentation has been submitted to NEB, including a report confirming that the design of facilities, construction plan, and planned operations comply with the following:

- a) ITC Lake Erie’s 500 kV equipment has been designed for a continuous voltage rating of at least 550 kV; and
- b) ITC Lake Erie’s protective relaying system will be set to ensure that transmission equipment remains in-service for the voltage range between 94% of the minimum continuous value and 105% of the maximum continuous value;
- c) ITC Lake Erie has made provision in the design of protections and controls of the Project to allow for future installation of Special Protection Scheme equipment that complies with the Northeast Power Coordinating Council reliability requirements.

Compliance Program

ITC Lake Erie shall file with the Board for approval, at least sixty (60) days prior to the commencement of construction, a Quality Assurance and Compliance Program. The Program shall describe the methods by which ITC Lake Erie shall ensure the Project described in the Application is designed, constructed and operated in conformity with the conditions of approval, company designs, specifications and undertakings set forth in the Application or otherwise adduced in its evidence.

- a) the project’s or procedure to identify conditions of approval, company designs, specifications and undertakings set forth in the Application or otherwise adduced in its evidence before the Board; the Program shall include, but not be limited to:
  - the position title and contact information of the person(s) responsible for each aspect of the Program;
  - the qualifications, contact information, description of the job role and the position title of the person(s) who is authorized to stop work should the work be in non-conformity with conditions of approval, company designs, specifications and undertakings set forth in the Application or otherwise adduced in ITC Lake Erie’s evidence;
  - a process or procedure to identify any corrective action as a result of any non-conformances that may be necessary before recommencing work;
- b) processes or procedures to monitor, measure, document and report on compliance with conditions of approval, company designs, specifications and undertakings set forth in the Application or otherwise adduced in ITC Lake Erie’s evidence;
- c) the position title and contact information of the person(s) responsible for each aspect of the Program;
- d) the qualifications, contact information, description of the job role and the position title of the person(s) who is authorized to stop work should the work be in non-conformity with conditions of approval, company designs, specifications and undertakings set forth in the Application or otherwise adduced in ITC Lake Erie’s evidence;
- e) a process or procedure to evaluate the effectiveness of the corrective actions taken as a result of any non-conformances; and
- f) methods by which adherence to the Program shall be monitored, measured, documented and reported to ITC Lake Erie’s management.

Reliability, Safety, and Security of Interconnection Power Lines

ITC Lake Erie shall:

- a) comply with the provisions of Board Order MD-026-2012 electric reliability; and
- b) file with the Board a list of reliability standards applicable to the Project, at least sixty (60) days prior to the commencement of construction.

Design and Interconnection Compliance

ITC Lake Erie shall file with the Board for approval, at least sixty (60) days prior to the commencement of construction, a report confirming that the design of facilities, construction plan, and planned operations comply with the following:

- a) ITC Lake Erie’s 500 kV equipment has been designed for a continuous voltage rating of at least 550 kV;
- b) ITC Lake Erie’s protective relaying system will be set to ensure that transmission equipment remains in-service for the voltage range between 94% of the minimum continuous value and 105% of the maximum continuous value;
- c) ITC Lake Erie’s connection equipment has been designed to be fully operational within ±50 degrees C to +10 degrees C ambient air temperature;
- d) ITC Lake Erie has made provision in the design of protections and controls of the Project to allow for future installation of Special Protection Scheme equipment that complies with the Northeast Power Coordinating Council reliability requirements.

Environmental Compliance Manager Qualifications

ITC Lake Erie shall file with the Board, at least twenty one (21) days prior to commencement of construction, confirmation by an officer of ITC Lake Erie that all necessary approvals and permits have been obtained for the Project from the organizations listed in Section 4.4.2 “Other Approvals and Permits”. ITC Lake Erie shall also include in the filing any commitments or conditions set forth in the Application or otherwise adduced in its evidence relevant to the conditions of approval, company designs, specifications and undertakings set forth in the Application or otherwise adduced in ITC Lake Erie’s evidence. A copy of the commitments or conditions shall be filed with the Board at least fourteen (14) days prior to commencement of construction.

- a) a process or procedure to identify conditions of approval, company designs, specifications and undertakings set forth in the Application or otherwise adduced in the Application;
- b) a Quality Assurance and Compliance Program. The Program shall describe the methods by which ITC Lake Erie shall ensure the Project described in the Application is designed, constructed and operated in conformity with the conditions of approval, compliance requirements, and agency direction will be included in the EPP as appropriate.

ITC Lake Erie shall file with the Board for approval, at least ninety (90) days prior to the commencement of construction, a list of commitments or conditions set forth in the Application or otherwise adduced in ITC Lake Erie’s evidence. A copy of the commitments or conditions shall be filed with the Board at least fourteen (14) days prior to commencement of construction.

- a) processes or procedures to monitor, measure, document and report on compliance with conditions of approval, company designs, specifications and undertakings set forth in the Application or otherwise adduced in ITC Lake Erie’s evidence;
- b) processes or procedures to monitor, measure, document and report on compliance with conditions of approval, company designs, specifications and undertakings set forth in the Application or otherwise adduced in ITC Lake Erie’s evidence;
- c) the qualifications, contact information, description of the job role and the position title of the person(s) who is authorized to stop work should the work be in non-conformity with conditions of approval, company designs, specifications and undertakings set forth in the Application or otherwise adduced in ITC Lake Erie’s evidence;
- d) the qualifications, contact information, description of the job role and the position title of the person(s) who is authorized to stop work should the work be in non-conformity with conditions of approval, company designs, specifications and undertakings set forth in the Application or otherwise adduced in ITC Lake Erie’s evidence.

Commitments Tracking Table

ITC Lake Erie shall file with the Board, at least sixty (60) days prior to the commencement of construction, a commitments tracking table listing all commitments made or requirements attached to any permits or approvals so issued.

ITC Lake Erie shall file with the Board, at the following times, an updated commitments tracking table:

- at least twenty one (21) days prior to commencement of construction;
- at least sixty (60) days prior to the commencement of construction.

Other Approvals and Permits

ITC Lake Erie shall file with the Board, at least forty five (45) days prior to commencement of construction, confirmation by an officer of ITC Lake Erie that all necessary approvals and permits have been obtained for the Project from the organizations listed in Section 4.4.2 “Other Approvals and Permits”. ITC Lake Erie shall also include in the filing any commitments or conditions set forth in the Application or otherwise adduced in its evidence relevant to the conditions of approval, company designs, specifications and undertakings set forth in the Application or otherwise adduced in ITC Lake Erie’s evidence. A copy of the commitments or conditions shall be filed with the Board at least fourteen (14) days prior to commencement of construction.

- a) a process or procedure to identify conditions of approval, company designs, specifications and undertakings set forth in the Application or otherwise adduced in the Application;
- b) processes or procedures to monitor, measure, document and report on compliance with conditions of approval, company designs, specifications and undertakings set forth in the Application or otherwise adduced in ITC Lake Erie’s evidence;
ITC Lake Erie Commitments Tracking Table

Canadian Commitments

Version 51
June 1 – June 30, 2020
Updated: 30-Jul-20

<table>
<thead>
<tr>
<th>Number</th>
<th>Commitment Description</th>
<th>Project Stage(s)</th>
<th>Accountable Lead</th>
<th>Status</th>
<th>Where Commitment Made</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>82</td>
<td>in Water Third party facilities Crossing Plan</td>
<td>PC</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>EC</td>
<td>Condition 18</td>
</tr>
<tr>
<td>83</td>
<td>The Erosion and Sedimentation Control Plan was developed to a sufficient level of detail in accordance with local and provincial standards.</td>
<td>PC; C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>BI</td>
<td>R 7.6a</td>
</tr>
<tr>
<td>84</td>
<td>The horizontal directional drilling (HDD) and contingency plan will be completed once the detailed drill design is complete.</td>
<td>PC; C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>BI</td>
<td>R 8.1</td>
</tr>
<tr>
<td>85</td>
<td>The EPP will be updated and revised as necessary through detailed design and will be filed with the NES when complete.</td>
<td>PC</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>BI</td>
<td>R 7.6a</td>
</tr>
<tr>
<td>86</td>
<td>The Cultural Heritage Resource Discovery Contingency Plan will address the unlikely discovery of cultural heritage resources.</td>
<td>PC; C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>BI</td>
<td>R 4.10</td>
</tr>
<tr>
<td>87</td>
<td>The Cultural Heritage Resource Discovery Contingency Plan will address the unlikely discovery of cultural heritage resources.</td>
<td>PC; C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>BI</td>
<td>R 4.16</td>
</tr>
<tr>
<td>88</td>
<td>Pre-construction communication with local boating associations will limit interactions with local boating activities.</td>
<td>PC</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>BI</td>
<td>R 7.6a</td>
</tr>
<tr>
<td>89</td>
<td>The Horizontal Directional Drilling (HDD) and Contingency Plan and Emergency Plan including the Inadvertent Return Plan will be completed once the detailed drill design is complete.</td>
<td>PC</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>BI</td>
<td>R 7.6a</td>
</tr>
<tr>
<td>90</td>
<td>The Inadvertent Return Plan for HDD will be developed which will specify how to monitor for, identify, contain, and remediate releases of drilling fluid. Descriptions of drilling fluid (e.g., material safety data sheets) will also be included in the plan.</td>
<td>PC</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>BI</td>
<td>R 7.6a</td>
</tr>
</tbody>
</table>

Legend:
- **D** = Design
- **PC** = Pre-Construction
- **O** = Operation
- **DEC** = Decommissioning
- **ALL** = All phases of the Project

APP = National Energy Board Application
IR = Information Request
SUP = Supplementary Evidence
FL = Filing
EC = NES Election Certificate
EC-056 (June 26/17)
The ERPs for construction and operations will include relevant and up-to-date contact information so members of the public are able to notify ITC Lake Erie and/or other relevant entities, of an emergency.

An Environmental Protection Plan (EPP) will be developed that will include protocols for managing discoveries of wildlife, including migratory birds.

ITC Lake Erie confirms that the Waste Management Plan will be updated for the Final EPP, including both the terrestrial and aquatic portions of the Project. Please note that there are no legislated reporting requirements for implementation of the Waste Management Plan.

The Traffic Management Plan will be developed to minimize potential effects associated with construction related traffic and associated potential effects (i.e., temporary lane closures).

The Waste Management Plan will address the control of waste from the Project in accordance with NSB and other potential regulatory requirements.

ITC Lake Erie confirms that the Waste Management Plan will be updated for the Final EPP, including both the terrestrial and aquatic portions of the Project. Please note that there are no legislated reporting requirements for implementation of the Waste Management Plan.

Waste Management Plan

ITC Lake Erie confirms that the Waste Management Plan will be updated for the Final EPP, including both the terrestrial and aquatic portions of the Project. Please note that there are no legislated reporting requirements for implementation of the Waste Management Plan.

EC-056 (June 26/17)
ITC Lake Erie will consult with the appropriate parties and agencies during the development of the ERPs for construction and operations in accordance with applicable standards, including Canadian Standards Association (CSA) Standard Z731-03: Emergency Preparedness and Response and North American Electric Reliability Corporation (NERC) Standard EOP-001-2b: Emergency Operations Planning.

ITC Lake Erie will consult with appropriate parties, agencies, and governments that have the relevant expertise when establishing the ERPs, including, but not limited to, continuing consultation with:
- Hamilton County;
- Ministry of Natural Resources and Forestry (MNRF);
- Ministry of the Environment and Climate Change;
- Ministry of Transportation;
- Ministry of Energy;
- Hydro One;
- Independent Electricity System Operator (IESO);
- PUM;
- Transport Canada; and
- Canadian Coast Guard.

ITC will issue correspondence to relevant agencies to confirm the relevant and interested parties to be engaged. The extent of consultation will be determined by the identified hazards and associated Project activities.

Following confirmation of appropriate agencies and the extent of consultation, appropriate engagement will be carried out (including through emails, telephone, and meetings) to solicit input on proposed approaches for emergency response planning associated with the construction and operation of the Lake Erie Connector. Agencies and interested parties will be provided an opportunity, as requested, to review and comment on the draft ERP documents. Comments will be considered and addressed accordingly. The final ERPs will be provided to those agencies that confirm that a copy is required to be filed with that agency during the consultation process.

ITC Lake Erie will include a detailed description of the notification procedure and associated parties to be notified in the ERPs that will provided to the NEB when complete. The parties to be notified may include some or all of the parties and agencies listed in the response to IR 6.1 a).

ITC Lake Erie will include in the ERPs for construction and operations a comprehensive list of entities (parties and agencies) with which the ERP will be provided and a description of the frequency of ERP updates, which will be confirmed with the individual parties and agencies through consultation. Parties and agencies to be provided with the ERP may include some or all of those listed in the response to IR 6.1 a) above. The confirmed list of entities will be included in the ERPs provided to the NEB.

The ERPs will be coordinated with Hydro One and En IESO and, as required, the corresponding agencies in the United States.

ITC Lake Erie will consult with relevant entities (parties and agencies) in the Project area in conducting education activities regarding the identified hazards.

The process for hazard identification and evaluation will assess the probabilities and consequences associated with hazards arising from human activities, technological events and natural threats in accordance with CSA Standard Z731-03: Emergency Preparedness and Response. Risk-based analyses evaluating historical occurrence, probability of recurrence, vulnerability, maximum threat potential, severity, and amount of pre-event warning for various hazards will be examined and a representative risk assessment will be completed for the Project.

Site-specific Health and Safety Plans will be developed that define the potential hazards at each work site including:
- the location, quantity and types of hazardous materials;
- routes by which hazardous materials will be transported; and
- areas of public health concern and sensitive environmental areas, if any.

The results of the above will be used to complete the initial hazard identification.

ITC Lake Erie will consult with the appropriate parties and agencies during the development of the ERPs for construction and operations. A description of the consultation plan will be provided to the NEB in draft form by July 6, 2016.

ITC Lake Erie is currently developing the process that would be used to identify potential hazards associated with the Project, and will provide this to the NEB in draft form by July 6, 2016.

The detailed description of the potential hazard identification process for the Project will be included in the ERPs and will be provided to the NEB when completed.

The ERPs for construction and operations will include the following primary components:
- Safety Policy;
- Environmental Policy;
- Emergency Preparedness and Response Policy;
- Distribution System;
- Emergency Levels and Definitions;
- Emergency Contacts;
- Responsibilities;
- Activation and Notification;
- Response Action Plans;
- Post Emergency;
- Past Specific; and
- Forms.

A more detailed outline will be provided to the NEB in draft form by July 6, 2016.

The ERPs for construction and operations will be completed based on relevant standards, including the National Standard of Canada, CANS/CSA Z731-03 (R2014): Emergency Preparedness and Response. A detailed list of the standards relevant to the ERPs will be provided in draft form by July 6, 2016.

ITC Lake Erie is developing the notification procedure to be contained within the ERP and will provide this to the NEB in draft form by July 6, 2016.

ITC Lake Erie will consult with the appropriate parties and agencies during the development of the ERPs for construction and operations in accordance with applicable standards, including Canadian Standards Association (CSA) Standard Z731-03: Emergency Preparedness and Response and North American Electric Reliability Corporation (NERC) Standard EOP-001-2b: Emergency Operations Planning.
**ITC Lake Erie Commitments Tracking Table**

**Canadian Commitments**

**Version 31**

**Updated:** 30-Jul-20

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<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>147</td>
<td>Site fencing will be installed to limit access to construction personnel.</td>
<td>C, D</td>
<td>ITC LEC Project Team</td>
<td>In Progress</td>
<td>EC</td>
<td></td>
</tr>
<tr>
<td>148</td>
<td>ITC Lake Erie will plan staging and construction activities to avoid impacts to adjacent Cultural Heritage Landscapes (Pickering Beach Lane) if practical. ITC Lake Erie will carry out a reessue specific heritage impact assessment prior to construction if avoidance is not practical.</td>
<td>C, D</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP, IR</td>
<td></td>
</tr>
<tr>
<td>150</td>
<td>The launching pits on either side of the rail spur (location: 50-80, 250-300) will be isolated with a multi-functional protective barrier designed to provide sediment and erosion control.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>IR, SUP</td>
<td></td>
</tr>
<tr>
<td>151</td>
<td>The sump pits and any open trench associated with cable installation will be isolated from surrounding areas by a multi-functional protective barrier designed to provide sediment and erosion control.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>IR, SUP</td>
<td></td>
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<tr>
<td>152</td>
<td>Site fencing will be installed to limit access to construction personnel.</td>
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<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP</td>
<td></td>
</tr>
<tr>
<td>153</td>
<td>Install a multi-functional protective barrier as required for excavations, consisting of a minimum 244 cm (8 ft) high chain-link fence with a minimum 100 cm-wide weave cloth attached to the exterior to prevent inadvertent wildlife access, including amphibians and reptiles that may incidentally traverse the work area. The multi-functional barrier may include a chain-link fence mounted on top of a concrete jersey barrier also providing traffic safety and work zone protection.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>SUP</td>
<td></td>
</tr>
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</table>

**Legend:**

- **EC** = Condition (b), (c), and (d)
- **APP** = National Energy Board Application; **IR** = Information Request; **SUP** = Supplementary Evidence; **FL** = Filing; **EC** = NEB Election Certificate EC-056 (June 26/17)
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<td>154</td>
<td>Work with both Ontario Power Generation (OPG) and Haldimand County to inspect and maintain the integrity of existing security fencing during construction</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP, M</td>
<td>ITC Lake Erie Commitments Tracking Table</td>
</tr>
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<td>155</td>
<td>Trenching in bedrock will then employ either gravel or low intensity blasting. Measures to avoid harm to fish and fish habitat will be employed in accordance with OPG guidance.</td>
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<tr>
<td>156</td>
<td>Backfill trench to a level approximately in accordance with the original level of the bedrock with crushed limestone (ASTM C33, size #57) from a source that complies with standards</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
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<td>157</td>
<td>ITC Lake Erie will adhere to the MNRF’s guidance on in-water work timing windows.</td>
<td>C</td>
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</tr>
<tr>
<td>158</td>
<td>Remove all blasting debris and other associated equipment (anthropogenic material) from the blast area upon completion of the trench, with the exception of the shot rock which will be left in place for ballast.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>RI</td>
<td>ITC Lake Erie Commitments Tracking Table</td>
</tr>
<tr>
<td>159</td>
<td>fish present in and near (100 m) of the trench may be affected by blasting and in-water work activities. The impacted fish species will be tracked and their movements monitored.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP, M</td>
<td>ITC Lake Erie Commitments Tracking Table</td>
</tr>
<tr>
<td>160</td>
<td>Fish present in and near water areas will be monitored by incidental fish observers and/or the use of bait-mounted sonar. Fish will be started from the works area immediately prior to each daily blast with use of mechanical noise making equipment operated from a boat over the blast zone.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
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<td>161</td>
<td>New trenching in bedrock will then employ either gravel or low intensity blasting. Measures to avoid harm to fish and fish habitat will be employed in accordance with OPG guidance.</td>
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<td>163</td>
<td>A minimum separation distance of 20 m will be maintained between the cable routes and the wetland and watercourse features on the Haldimand Converter Station site.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
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The interconnection of the Project with these stations (the Erie West 345 kV substation in Pennsylvania and the Nanticoke TS switchyard in Ontario) will be undertaken together with the ITC LEC Project Team.

The Site Construction Manager will be responsible for overseeing and coordinating inspection measures during construction. This person will communicate with municipal and regional staff to develop traffic control and safety measures, including modified routes for emergency response during construction.

Construction and installation techniques will be used to minimize potential effects on pipeline crossings.

The jet plow installation will be pre-planned to avoid shallow sediments that have insufficient loadbearing capacity to support the jet plow. In areas where the load bearing capacity of the lake bed is insufficient to support the jet plow, the underwater HVDC cable will be installed utilizing nổily buried ROVs with water jets. In sediments that are too soft to support the jet plow, the ROV will bury the cable approximately 2 m below the lakebed using 2 m jetting spears and a 2 m depressor arm.

Construction Progress Reports:
- ITC Lake Erie will file with the Board, at the end of each month during construction, construction progress reports. The reports shall include information on the activities carried out during the reporting period, as well as any environmental, safety and security issues and non-compliance that arose and the measures undertaken for the resolution of these issues and non-compliance. The final report shall include a schedule for anticipated submission of each monthly report until construction is complete.
- ITC Lake Erie will implement a construction management plan, including protocols to minimize engine idling and maintenance vehicles.
- ITC Lake Erie will implement appropriate fugitive dust control measures such as wetting, staging of work, and erosion and sedimentation control measures as required.
- ITC Lake Erie will coordinate with the Haldimand County Roads Department and adjacent property owners as appropriate to minimize disruption during installation.
- ITC Lake Erie will coordinate with the appropriate utility during installation of the AC and HVDC cables.
- Should there be noise complaints by landowners and the public, ITC Lake Erie will address such complaints as required and in a manner consistent with the requirements of the NEB Act and the Electricity Filing Manual.
- ITC Lake Erie will implement erosion and sedimentation control measures during construction of the Haldimand Converter Station and installation of the AC and HVDC cables, including an initial reclamation plan for VDC installation.

ITC Lake Erie shall file with the Board, within sixty (60) days of the completion of construction, a report detailing any construction activities that did not comply with applicable occupational health and safety legislation.

ITC Lake Erie shall perform all excavations along the cable route in accordance with applicable occupational health and safety legislation. ITC Lake Erie shall file with the Board, at least ninety (90) days prior to the commencement of operations, a safety manual related to the operation activities of the Project. The manual must address routine operation procedures, activities, and public safety issues that might be encountered during the operation of the:
- terrestrial and in-water cables; and
- AC and HVDC cables including an initial reclamation plan for VDC installation.

Abandonment Funding:
- ITC Lake Erie will file with the Board for approval, at least ninety (90) days prior to the date the Project is placed in service, a mechanism to set-aside funds for the future abandonment of the Project that is consistent with the principles for set-aside mechanisms set out in the Board’s MH-001-2013 Reasons for Decision dated 29 May 2014, and specifically chapters 2.9, 2.4, 5.2.2, and 5.2.4, and appendices V9. XI, and X11. The set-aside mechanism shall reflect the abandonment cost estimate. ITC Lake Erie will file in its evidence.
- The interconnection of the Project with these stations (the Erie West 345 kV substation in Pennsylvania and the Nanticoke TS switchyard in Ontario) will be undertaken together with Penndol and Hydro One respectively, subject to their customer impact and approve processes.

Commissioning:
- ITC Lake Erie shall perform all excavations along the cable route in accordance with applicable occupational health and safety legislation. ITC Lake Erie shall file with the Board, within sixty (60) days of the completion of construction, a report detailing any construction activities that did not comply with applicable occupational health and safety legislation.
<table>
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<tr>
<th>Number</th>
<th>Commitment Description</th>
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<th>Status</th>
<th>Where Commitment Made</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>211</td>
<td>Shredding will be employed to the extent practical to address noise during HDD installation.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>As required</td>
<td>APP, IR</td>
<td>§2.1.1, p. 6-48; §2.2.5, p. 6-100</td>
</tr>
<tr>
<td></td>
<td>ITC Lake Erie will continue to monitor piezometric levels in three monitoring wells installed on the Haldimand Converter Station site to confirm static conditions and to determine the range of seasonal fluctuations in groundwater levels to confirm pre-construction conditions.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP, IR, IR, EC-056, Response to IR 1&amp;2 Attachment 3 (Sept 18/15)</td>
<td>§6.2.1.14, p. 6-86; §6.2.1.15, p. 6-86; §6.2.1.16, p. 6-86</td>
</tr>
<tr>
<td>216</td>
<td>Seasonal avoidance of the spring and fall fish spawning seasons will be considered as a possible additional protective measure for the first approach of the HDD to the receiving pit, which may have an increased risk of net-containing as cover over the drift path decreases.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>No Longer Applicable as per correspondence with MNRF</td>
<td>APP</td>
<td>§6.2.2, p. 6-100</td>
</tr>
<tr>
<td>217</td>
<td>(a) Hard work will be involved in determining a suitable system of earth retention and clean-up if necessary.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP, IR, IR, EC-056, Response to IR 1&amp;2 Attachment 3 (Sept 18/15)</td>
<td>§6.2.2.5, p. 6-100</td>
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<tr>
<td>218</td>
<td>Preparatory excavation of the HDD receiving pit and pre-cutting of the trench will physically avoid spawning areas, and will include mitigation measures to prevent serious harm to individual fish.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
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<td>§6.2.2.5, p. 6-100</td>
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<tr>
<td>220</td>
<td>Visual monitoring of the Lake Erie beach and shoreline area during HDD will identify the occurrence of drilling fluids at the ground surface in the unlikely event of an inadvertent release.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
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<td>§6.2.2.5, p. 6-100</td>
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<td>221</td>
<td>Drilling fluid release is detected, the following procedures will be implemented: - HDD Contractor will immediately notify the appropriate regulatory agencies that a fluid release has been detected.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>As required</td>
<td>SUP, Supplementary Evidence Attachment 1 (June 24/16)</td>
<td>§6.2.2.7, p. 6-100</td>
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<td>222</td>
<td>- HDD Contractor will immediately begin containment efforts.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
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<td>223</td>
<td>- HDD Contractor will begin steps to reduce released fluid volume and pressure.</td>
<td>C</td>
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<td>224</td>
<td>- Once containment has been established drilling will continue.</td>
<td>C</td>
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<td>225</td>
<td>- If the amount of the release occurring exceeds that which can be contained and collected drilling operations will be suspended until released volume can be brought under control.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
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<td>226</td>
<td>- HDD Contractor will contain and pump or vacuum collected drilling fluid.</td>
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<td>227</td>
<td>- If a fluid release occurs, the HDD Contractor will contain and pump or vacuum the fluid.</td>
<td>C</td>
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<td>228</td>
<td>- On land the fluid that can not be recovered will be diluted and removed from vegetation by washing with water.</td>
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<td>229</td>
<td>- If any amount of drilling fluid release, either on land or within the lake, exceeds that which can be feasibly contained and collected, drilling operations will be suspended.</td>
<td>C</td>
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<td>230</td>
<td>- Air drilling fluids from wells will be removed and disposed of at an approved facility.</td>
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<td>- HDD Contractor will remove and dispose of drilling fluids at an approved facility.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP, IR, IR, EC-056, Response to IR 1&amp;2 Attachment 3 (Sept 18/15)</td>
<td>§6.2.2.7, p. 6-100</td>
</tr>
<tr>
<td>241</td>
<td>- HDD Contractor will remove and dispose of drilling fluids at an approved facility.</td>
<td>C</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP, IR, IR, EC-056, Response to IR 1&amp;2 Attachment 3 (Sept 18/15)</td>
<td>§6.2.2.7, p. 6-100</td>
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</tbody>
</table>

**LEGEND:**
- **D** = Design;
- **PC** = Pre-Construction;
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- **ALL** = All phases of the Project

**APP** = National Energy Board Application; **IR** = Information Request; **SUP** = Supplementary Evidence; **FL** = Filing; **EC** = NEB Election Certificate; **EC-056** (June 26/17)
ITC Lake Erie shall file with the Board, within sixty (60) days after the completion of the in-water cable installation:

a) a list of anchor drop risk areas identified along the Canadian portion of the cable route; and
b) a letter of confirmation that ITC Lake Erie has communicated to those authorities the locations of the identified anchor drop risks and of the areas where cable burial is less than the minimum burial depth as identified by ITC Lake Erie.

Pre-Construction and Pre-Installation Activities

In the event of construction or clearing activities within restricted activity periods for migratory birds, ITC Lake Erie shall:

a) retain a qualified avian biologist to carry out pre-construction surveys in accordance with Environment and Climate Change Canada’s guidance to identify any migratory and other breeding birds and seabirds; and
b) file a letter with the Board, within fourteen (14) days post commencement of construction or clearing:

i) the results of the surveys;
ii) a description of the mitigation, including monitoring, developed in consultation with government authorities, to protect any identified migratory and other breeding birds and seabirds; and
iii) a letter of confirmation that ITC Lake Erie has consulted with the appropriate provincial and federal regulatory authorities in relation to matters set out in a), b) i), and b) ii).

Appropriate notifications will be provided to the Ministry, Canadian Coast Guard Marine Communications and Traffic Services Centre, mariners, and commercial and recreational traffic prior to and during installation activities.

ITC Lake Erie will notify the appropriate Canadian marine authorities as described in the Draft Environmental Protection Plan: Section 6.2 - Communications Requirements of the draft Navigation and Navigation Safety Plan. The appropriate marine authorities include all applicable Port Authorities; Vessel Traffic Services; Transport Canada; Canadian Hydrographic Service; and the Canadian Coast Guard.

Use of required signals and lighting to identify temporary works associated with installation activities.

Installation of the underwater HVDC cables in accordance with the installation methods and applicable regulations and guidance materials.

250 Burial of the HVDC cables in the lakebed to protect the cables from damage due to shipping traffic, fishing activity and ice scour.

Excavated soils will be temporarily stockpiled within the worksite or transported to a suitable disposal location off-site. Excavated soils will be protected by appropriate erosion and sedimentation control where the potential exists for sediment transport off-site.

ITC Lake Erie shall file with the Board, at least sixty (60) days prior to the commencement of operations, an Operations and Maintenance Manual for the ITC Lake Erie transmission system. The Manual shall require ITC Lake Erie to conduct documented audits of its records and inspections of the ITC Lake Erie electrical system and right of way to confirm ITC Lake Erie’s conformity to the requirements of the Manual. The Manual shall also include a schedule or procedure for yearly review and update, as appropriate, to remain current with regulatory requirements and accepted industry practice. The Manual, and the programs and procedures on ITC Lake Erie’s records as required by the Manual, shall be made available to the Board for periodic review. The Manual should include, but not be limited to:

a) type of maintenance followed by ITC Lake Erie;
b) maintenance schedules according to the selected maintenance practice;
c) operational procedures for steady state and transient conditions;
d) maintenance and monitoring requirements and plans for the power line (terrestrial and in-water cable) and the Haldimand Converter Station;
e) a public awareness program for the life of the Project that:

i) promotes public awareness of ongoing hazards associated with the Project; and
ii) provides contact numbers for the public to report issues and concerns;
f) vegetation control plans and procedures for the power line’s right-of-way and the Haldimand Converter Station footprint; and
h) the maintenance and operations records that will be produced during operations, including during the performance of maintenance tasks and routine inspections.

In order to address the potential for soil movement from the underground AC and HVDC cables during operation, the trenches used for the majority of the installation would be back filled with the same or similar testing material as necessary.

Once construction is complete, disturbed areas will be regraded to pre-existing contours and repaved or re-seeded with an appropriate seed mix to ensure erosion and sedimentation potential. ITC Lake Erie will consult with Haldimand County and the Long Point Region Conservation Authority (LPRCA) to confirm the preferred seeding for the Haldimand Road 55 ROW.

ITC Lake Erie will submit the design to Haldimand County as part of the process to establish the ROW. Once construction is complete, the area of the Haldimand Road 55 ROW will be returned to previous condition and roadside ditching will be restored. The underground cable route will be maintained in accordance with the ROW. The underground cable route will be managed in-situ and spoils along the Haldimand Road 55 ROW will be managed at the Haldimand Converter Station site.

ITC Lake Erie shall file with the Board, a letter of confirmation that ITC Lake Erie has consulted with each of the following authorities in relation to matters set out in a), b) i., and b) ii.:

a) the results of the surveys;
b) a list of the appropriate Canadian authorities that have been notified of such risks; and

This HVDC and AC cable trench located in the Haldimand Road 55 right-of-way will be restored in accordance with municipal and provincial requirements.

264 For trenching on the Haldimand Converter Station site and in the ROW of Haldimand Road 55, a shared trench will be excavated. Spoils from the Haldimand Converter Station site will be managed in-situ and spoils along the Haldimand Road 55 ROW will be managed at the Haldimand Converter Station site.

Excavated soils will be temporarily stockpiled within the worksite or transported to the Haldimand Converter Station property. Topsoil will be stored separately from excavated subsoil to facilitate reuse. Materials that may be hauled off-site for disposal will be tested to ensure compliance with Ontario disposal regulations. Soil stockpiles will be protected by the maintenance and operations records that will be produced during operations, including during the performance of maintenance tasks and routine inspections.

251 Operations and Maintenance Manual

Operations and Maintenance Manual

ITC Lake Erie shall file with the Board, at least sixty (60) days prior to the commencement of operations, an Operations and Maintenance Manual for the ITC Lake Erie transmission system. The Manual shall require ITC Lake Erie to conduct documented audits of its records and inspections of the ITC Lake Erie electrical system and right of way to confirm ITC Lake Erie’s conformity to the requirements of the Manual. The Manual shall also include a schedule or procedure for yearly review and update, as appropriate, to remain current with regulatory requirements and accepted industry practice. The Manual, and the programs and procedures on ITC Lake Erie’s records as required by the Manual, shall be made available to the Board for periodic review. The Manual should include, but not be limited to:

a) type of maintenance followed by ITC Lake Erie;
b) maintenance schedules according to the selected maintenance practice;
c) operational procedures for steady state and transient conditions;
d) maintenance and monitoring requirements and plans for the power line (terrestrial and in-water cable) and the Haldimand Converter Station;
e) a public awareness program for the life of the Project that:

i) promotes public awareness of ongoing hazards associated with the Project; and
ii) provides contact numbers for the public to report issues and concerns;
f) vegetation control plans and procedures for the power line’s right-of-way and the Haldimand Converter Station footprint; and
h) the maintenance and operations records that will be produced during operations, including during the performance of maintenance tasks and routine inspections.

In order to address the potential for soil movement from the underground AC and HVDC cables during operation, the trenches used for the majority of the installation would be back filled with the same or similar testing material as necessary.
**ITC Lake Erie Commitments Tracking Table**

**Canadian Commitments**

<table>
<thead>
<tr>
<th>Number</th>
<th>Commitment Description</th>
<th>Project Stage(s)</th>
<th>Accountable Lead</th>
<th>Status</th>
<th>Where Commitment Made</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>265</td>
<td>Excavated soils (from HDD) will be temporarily stored on site during construction and will be re-used to restore the site to its previous grade once the drilling process has been completed, or transported for disposal as an approved location.</td>
<td>C ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP</td>
<td>§ 4.2.3.7</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Appropriate soil protection and containment measures for hydraulic fluids or oils will be applied during construction. Construction crews will have spill response procedures and spill response equipment on site to manage any spill.</td>
<td></td>
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</tr>
<tr>
<td>266</td>
<td>During excavation, appropriate measures such as grading and / or sound barriers (if required) will be applied to minimize potential surface water runoff into the trench. Post excavation, surface water will be directed to roadside ditches.</td>
<td>C ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP</td>
<td>§ 4.2.3.2</td>
<td></td>
</tr>
<tr>
<td>267</td>
<td>Water removed from excavated trenches will be discharged to an upland vegetated area of the roadway. It will be discharged through a &quot;pumped water filter bag&quot; surrounded by a compost filter sock that will allow water into existing roadway ditches or upland areas. There will be no direct discharge to roadside ditches.</td>
<td>C ITC LEC Project Team</td>
<td>Future Action</td>
<td>R</td>
<td>R 4.3 a, b, 2, b, c</td>
<td></td>
</tr>
<tr>
<td>268</td>
<td>Implement Stormwater Management Plan as described in the EPP and the associated Civil Grading Plan.</td>
<td>C ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP</td>
<td>§ 4.2.3</td>
<td></td>
</tr>
<tr>
<td>269</td>
<td>Site grading will be implemented to convey stormwater flows without adverse impact to other properties.</td>
<td>C ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP</td>
<td>§ 4.2.2.1</td>
<td></td>
</tr>
<tr>
<td>270</td>
<td>Continue surface water management in accordance with the Stormwater Management Plan.</td>
<td>C ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP</td>
<td>§ 4.2.1.3</td>
<td></td>
</tr>
<tr>
<td>271</td>
<td>Stormwater Management Plan as described in the EPP and the associated Civil Grading Plan.</td>
<td>C ITC LEC Project Team</td>
<td>Future Action</td>
<td>SUP</td>
<td>Supplementary Evidence Attachment 1 (June 24/16)</td>
<td></td>
</tr>
<tr>
<td>272</td>
<td>If any non-migratory bird or other terrestrial Species at Risk (SAR) individuals are encountered, the local Ministry of Natural Resources and Forestry (MNRF) District Office will be consulted.</td>
<td>C ITC LEC Project Team</td>
<td>Future Action</td>
<td>R</td>
<td>R 4.1b, c, d, e, f, g, h, i</td>
<td></td>
</tr>
<tr>
<td>273</td>
<td>Remove any trapped, injured or deceased wildlife within the construction areas to the Environmental Compliance Manager, who will contact the applicable provincial authorities to take appropriate action.</td>
<td>C ITC LEC Project Team</td>
<td>As required</td>
<td>SUP</td>
<td>Supplementary Evidence Attachment 1 (June 24/16)</td>
<td></td>
</tr>
</tbody>
</table>

**Accountable Lead Status Comments**

- **Updated:** 30-Jul-20
- **Number Commitment Description**
- **Where Commitment Made**
- **Comments**

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- **D** = Design; **PC = Pre-Construction; **C = Construction; **O = Operation; **EC = Election Certificate; **ALL = All phases of the Project
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**EC-056 (June 25/17)**
### ITC Lake Erie Commitments Tracking Table

**Canadian Commitments**

**Version 51**

**Updated:** 30-Jul-20

<table>
<thead>
<tr>
<th>Number</th>
<th>Commitment Description</th>
<th>Project Stage(s)</th>
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<th>Where Commitment Made</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>296</td>
<td>The EMPs for construction and operations are expected to include the primary components listed below. Additional detail has been provided regarding the anticipated contents of each EMP section (in response to IR 6.1c).</td>
<td>C; O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>Supplementary Response to IR 6.1a (Jul 6/16)</td>
<td></td>
</tr>
<tr>
<td>297</td>
<td>The notification procedures in the event of an emergency will be detailed in the draft EMPs. The notification procedures will be developed based on guidance as included in CSA Standards Z751-02 Emergency Preparedness and Response and NERC Standard CIP-002-2s - Emergency Operations Planning. The notification procedure will describe: who is responsible for notification and reporting;</td>
<td>C; O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>Supplementary Response to IR 6.1a (Jul 6/16)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- how to contact the responsible party; and</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>- how to contact other agencies when notification to the responsible party is made.</td>
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</tr>
<tr>
<td>298</td>
<td>Based on the consultation as outlined in the response to IR 6.1a, ITC Lake Erie will develop and confirm the list of entities that will require ITC Lake Erie to file the ERPs with the NEB.</td>
<td>C; O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>Supplementary Response to IR 6.1a (Jul 6/16)</td>
<td></td>
</tr>
<tr>
<td>299</td>
<td>The Safety Coordinator will monitor on-site hazards and conditions and perform hazard inspections at least once a month to ensure compliance with the Occupational Health and Safety Act (OHSA); however, if it is not practical to conduct the inspections once a month, the Safety Coordinator will conduct inspections at least at a part of the workplace every month.</td>
<td>C; O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>Supplementary Response to IR 6.1a (Jul 6/16)</td>
<td></td>
</tr>
<tr>
<td>300</td>
<td>The Safety Coordinator will be consulted when changes are made to equipment, materials, or processes that may affect the safety of operations. This proactive safety approach will ensure that the Safety Coordinator evaluates all equipment and processes for compliance with applicable safety rules and regulations.</td>
<td>C; O</td>
<td>ITC LEC Project Team</td>
<td>As required</td>
<td>Supplementary Response to IR 6.1a (Jul 6/16)</td>
<td></td>
</tr>
<tr>
<td>301</td>
<td>Implement landscaping and planting plan as detailed in the Landscaping and Planting Plan and associated design drawings.</td>
<td>C; O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>Supplementary Response to IR 6.1a (Jul 6/16)</td>
<td></td>
</tr>
<tr>
<td>302</td>
<td>ITC Lake Erie confirms that the Navigation and Navigation Safety Plan will be adhered to during cable repair activities.</td>
<td>C; O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>RI 1.14a</td>
<td></td>
</tr>
<tr>
<td>303</td>
<td>ITC will develop and maintain a robust maintenance plan for the Project, and include in the maintenance plan the identification of specific equipment requiring specialized maintenance and a description of the applicable maintenance practices.</td>
<td>C; O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>RI 1.12a, m, n (As of 4/15)</td>
<td>Response to IR 1 Attachment 1 (Dec 18/15)</td>
</tr>
<tr>
<td>304</td>
<td>Implement spill contingency protocols and procedures as described in the Spill Prevention and Contingency Plan.</td>
<td>C; O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>Supplementary Evidence Attachment 1 (June 24/16)</td>
<td></td>
</tr>
<tr>
<td>305</td>
<td>ITC Lake Erie will implement the Stormwater Management Plan and construct vegetated swales to provide quantity and quality control for the surface runoff from the Haldimand Converter Station site.</td>
<td>C; O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>Supplementary Evidence Attachment 1 (June 24/16)</td>
<td></td>
</tr>
<tr>
<td>306</td>
<td>The following general guidelines will be applied:</td>
<td>C; O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>Supplementary Evidence Attachment 1 (June 24/16)</td>
<td></td>
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<tr>
<td></td>
<td>- where a choice of equivalent products exists to perform the same function, the least hazardous product will be chosen;</td>
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<td>- when possible, wastes will be recycled;</td>
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<td>- hazardous products and waste materials will, to the extent possible, be disposed of or moved to a secure staging area on a daily basis</td>
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<tr>
<td>307</td>
<td>All excavation and shoring work will conform to OHSA.</td>
<td>C; O</td>
<td>DEC</td>
<td>Future Action</td>
<td>APP, IR</td>
<td></td>
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<td></td>
<td>- Dust and vehicle Emissions during construction will be controlled by:</td>
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<tr>
<td></td>
<td>- Compliance with local municipal by-laws regarding working/construction hours</td>
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<tr>
<td></td>
<td>- Implementation of protocols minimizing engine idling and maintenance vehicle idling</td>
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<td></td>
<td>- Dust control during construction through various operational methods such as watering, staging of work, and re-vegetation of disturbed areas</td>
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<tr>
<td>308</td>
<td>Noise Emissions during construction will be controlled by:</td>
<td>C; O</td>
<td>DEC</td>
<td>Future Action</td>
<td>APP, IR</td>
<td></td>
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<td>- Compliance with local municipal by-laws regarding working/construction hours</td>
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<td></td>
<td>- Use of shielding to mitigate noise from HDD installation to the degree practical</td>
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<tr>
<td>309</td>
<td>ITC will operate in compliance with applicable IESO and PJM operating requirements and criteria as elucidated in the IESO Market Rules and the PJM Open Access Transmission Tariff. These requirements include the duties of maintaining acceptable voltages, keeping equipment operating within established ratings, and maintaining system stability, both during normal operation and under recognized contingency conditions on the transmission system.</td>
<td>C; O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP</td>
<td></td>
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2. APP = National Energy Board Application; IR = Information Request; SUP = Supplementary Evidence; FIL = Filing; EC = NEB Election Certificate
3. EC-056 (June 26/17)

**Notes:**

- [1] App D, Table D-1
- [2] §6.2.1.15, p 6-71
- [3] §6.2.1.14, p 6-68
- [5] §6.2.1.4, p 6-38
- [6] §6.2.1.4, p 6-33

**Future Action**

- APP = National Energy Board Application; IR = Information Request; SUP = Supplementary Evidence; FIL = Filing; EC = NEB Election Certificate

**Notes:**

- [1] App D, Table D-1
- [2] §6.2.1.15, p 6-71
- [3] §6.2.1.14, p 6-68
- [5] §6.2.1.4, p 6-38
- [6] §6.2.1.4, p 6-33
Project ITC will, of course, operate the Project in compliance with all applicable IESO, NPCC, NERC and other reliability standards and criteria.

Specialist subcontractors required to maintain the ancillary systems within the substation compounds will be supervised by ITC’s lead for facility maintenance.

Vegetation (native grasses, perennials) will be planted on the site near the Haldimand Converter Station as part of the facility landscaping plan. O ITC LEC Project Team Future Action APP §4.3.6

A managed setback of approximately 15 m will be maintained to the west of the woodland/wetland block [on the Haldimand Converter Station property].

ITC is committed to operational excellence and ITC maintains a systematic program across its operating units to identify and replace broken, obsolete or high-maintenance equipment. O ITC Lake Erie Future Action APP §6.3.1.2

ITC Lake Erie will implement a weed control program as required during operations, particularly in the period of time that it takes to establish a landscaping plan for the Haldimand Converter Station. O ITC LEC Project Team Future Action EC Condition 40

Ground maintenance, weed killing and pest control will be performed on the converter station site.

ITC Lake Erie will implement a landscaping plan for the area outside the perimeter fence. O ITC LEC Project Team Future Action

g) an updated commitments tracking table as per Certificate Condition 8;

b) current insurance certificate(s) and updated details regarding the insurance and other financial instruments such as promissory note, line of credit, letter of credit or parental guarantee held by ITC Lake Erie to address its financial resource requirement that will enable ITC Lake Erie to respond to and cover any potential costs associated with a potential Project incident of at least $15 million; and
c) demonstration of readily accessible financial requirements for funds of at least $1.5 million using acceptable financial instruments such as cash on hand, secured line of credit or letter of credit;

d) reporting of the accrued funds for the set-aside of abandonment funds;

e) a report that complies with the provisions of Board Order MD-035-2012 electric reliability; and
f) import and export data organized by month for the previous calendar year;

An updated commitments tracking table as per Certificate Condition II:

h) the amount of contracted supply in megawatts of type of generation source (where possible); and

i) confirmation that no changes were made to ITC Lake Erie’s compliance program, safety manual, or operations and maintenance manual. If any changes have been made ITC Lake Erie is to provide a rational and descriptive description of the change(s) if not already provided to the Board.

Ground maintenance, weed killing and pest control will be performed on the converter station site.

Harvest maintenance tasks will include:

- Planned, scheduled shut-downs of the Haldimand Converter Station for equipment inspections, testing and replacement
- Vegetation management in the maintained buffer area around the Haldimand Converter Station
- Planned, scheduled shut-downs of the emergency generator

ITC Lake Erie will implement a landscaping plan for the area outside the perimeter fence.

ITC Lake Erie will routinely maintain and inspect equipment for leakage.

ITC Lake Erie will implement a weed control program as required during operations, particularly in the period of time that it takes to establish a landscaping plan for the Haldimand Converter Station.

Vegetation (native grasses, perennials) will be planted on the site near the Haldimand Converter Station as part of the facility landscaping plan.

Ground maintenance, weed killing and pest control will be performed on the converter station site.

Planned maintenance tasks will include:

- Annual outage maintenance.
- Quarterly, every six months and annual non-outage maintenance; and
- Periodic, scheduled shut-downs of the Haldimand Converter Station for equipment inspections, testing and replacement
- Vegetation management in the maintained buffer area around the Haldimand Converter Station
- Periodic, scheduled shut-downs of the emergency generator

ITC Lake Erie will implement a landscaping plan for the area outside the perimeter fence.

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- Vegetation management in the maintained buffer area around the Haldimand Converter Station
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- Annual outage maintenance.
- Quarterly, every six months and annual non-outage maintenance; and
- Periodic, scheduled shut-downs of the Haldimand Converter Station for equipment inspections, testing and replacement
- Vegetation management in the maintained buffer area around the Haldimand Converter Station
- Periodic, scheduled shut-downs of the emergency generator

ITC Lake Erie will implement a landscaping plan for the area outside the perimeter fence.

ITC Lake Erie will implement a landscaping plan for the area outside the perimeter fence.

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### ITC Lake Erie Commitments Tracking Table

**Canadian Commitments**

#### Version 51

**June 1 - June 30, 2020**

<table>
<thead>
<tr>
<th>Number</th>
<th>Commitment Description</th>
<th>Project Stage(s)</th>
<th>Accountable Lead</th>
<th>Status</th>
<th>Where Commitment Made</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>333</td>
<td>Post-Construction Environmental Monitoring for Tensaward River</td>
<td>O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>EC</td>
<td>Condition 32</td>
</tr>
<tr>
<td></td>
<td>ITC Lake Erie shall file with the Board, on or before 31 January of each of the first, second, and third growing seasons following completion of construction of the Project, a post-construction environmental monitoring report for the terrestrial portion of the Project that:</td>
<td></td>
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<tr>
<td></td>
<td>a) identifies any environmental issues that arose during construction or in the course of the previous year;</td>
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<tr>
<td></td>
<td>b) describes the methodology used for monitoring, the criteria established for evaluating success and the results found;</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>c) describes current status of the issues in a) and whether the issues are resolved or unresolved;</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>334</td>
<td>Operation of the underwater HVDC cables in accordance with the methods and applicable regulations and guidance materials</td>
<td>O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>SUP</td>
<td>Supplementary Evidence Attachment 1 (June 24/16)</td>
</tr>
<tr>
<td></td>
<td>ITC Lake Erie shall file with the Board, within sixty (60) days after the operational deviation has occurred, a written report that shall include:</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>i) the reasons why the deviation occurred;</td>
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<tr>
<td></td>
<td>ii) analysis of potential negative implications of the deviation to the HVDC Link; and</td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td>iii) mitigation strategies for the implications identified in paragraph b) 2) and when the mitigation was or will be implemented.</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>If in the event that an AC or HVDC cable repair is required, ITC Lake Erie will deploy erosion, sediment control and surface water control measures in the cable routes.</td>
<td>O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP</td>
<td>$6.2.1.4, p 6-38</td>
</tr>
<tr>
<td>336</td>
<td>Restoration/Reclamation Plan will be developed to re-vegetate the Haldimand Converter Station following decommissioning.</td>
<td>O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP, IR</td>
<td>$6.1.2, p 6-33, $6-3, App D, Table D-1, Responses to IR 1 &amp; 2 Attachment 3 (Sept 18/15)</td>
</tr>
<tr>
<td>338</td>
<td>Institute traffic signage on-site</td>
<td>O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>SUP</td>
<td>Supplementary Evidence Attachment 1 (June 24/16)</td>
</tr>
<tr>
<td>340</td>
<td>Field staff will be required to:</td>
<td>O</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>IR</td>
<td>Response to IR No. 7 &amp; Supplementary Evidence (July 29/16)</td>
</tr>
<tr>
<td></td>
<td>a) Category B and Category C training as outlined in Response to IR 7 Attachment 1; and</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>b) Safety Training, the details of which are under development.</td>
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</tr>
<tr>
<td></td>
<td>The AC and HVDC cables will be abandoned in place, limiting the potential effect of decommissioning. The AC and HVDC cables are comprised of solid, stable materials that are not anticipated to deteriorate over time.</td>
<td>DEC</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>SUP</td>
<td>Supplementary Evidence Attachment 1 (June 24/16)</td>
</tr>
<tr>
<td></td>
<td>i) Re-vegetation will occur with the removal of the Haldimand Converter Station and related facilities.</td>
<td>DEC</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP</td>
<td>$6.2.1.3, p 6-35</td>
</tr>
<tr>
<td></td>
<td>ii) Ownership and Operation: the international power line and its associated facilities to be constructed and operated pursuant to the Certificate (the Power Line) shall be owned and operated by ITC Lake Erie LLC.</td>
<td>DEC</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>App D, Table D-1, Responses to IR 1 &amp; 2 Attachment 3 (Sept 18/15)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>iii) Change of Owner/Operator: ITC Lake Erie shall not sell, convey, lease, or otherwise transfer the Power Line to any person, in whole or in part, without leave of the Board.</td>
<td>DEC</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>APP</td>
<td>$6.2.1.3, p 6-35</td>
</tr>
<tr>
<td></td>
<td>4) United States Approval: ITC Lake Erie shall file with the Board, at least sixty (60) days prior to the commencement of construction, approval by an authorized officer of the company that all necessary US federal and state permits and regulatory approvals regarding electrical standards and installation practices have been received for the US portion of the ITC Lake Erie Connector Project.</td>
<td>PC</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>EC</td>
<td>Condition 16</td>
</tr>
<tr>
<td>337</td>
<td>Implement stormwater management best practices in accordance with the Stormwater Management Plan</td>
<td>DE</td>
<td>ITC LEC Project Team</td>
<td>Future Action</td>
<td>SUP</td>
<td>Supplementary Evidence Attachment 1 (June 24/16)</td>
</tr>
<tr>
<td>339</td>
<td>Application of the same mitigation measures as applied during construction in the event that cable repair is required</td>
<td>O</td>
<td>ITC LEC Project Team</td>
<td>As required</td>
<td>SUP</td>
<td>Supplementary Evidence Attachment 1 (June 24/16)</td>
</tr>
</tbody>
</table>

**Legend:**
- EC-056 (June 26/17)
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<tr>
<td>359</td>
<td>An updated project construction schedule with the new in-service date and any other consequential adjustments will be filed in due course.</td>
<td>D, PC, C</td>
<td>ITC LEC Project Team</td>
<td>Complete</td>
<td>FIL</td>
<td>Letter re: Updated Project Schedule (Aug 2016) Schedule updates provided to the NEB on: - August 9, 2016 - October 14, 2016 - May 9, 2018 - October 4, 2019 - March 16, 2020</td>
</tr>
</tbody>
</table>