

**VIA EMAIL**

February 18, 2026

Ministry of Energy and Mines  
77 Grenville Street, 6th Floor  
Toronto, ON, M7A 2C1

Attention: Honourable Steven Lecce, Minister of Energy and Mines  
c/o Janice Pillon

Dear Ms. Pillon,

***Re: ERO for Advancing Critical Transmission Expansion in the Toronto Area- ERO Number: 026-0019***

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 Street site is over 30 acres in land area and is located immediately adjacent to the Port Lands Energy Centre ('PEC'), a natural gas-fired power plant and major source of carbon emissions. The 402 and 440 Unwin Avenue site is also home to the decommissioned Richard L. Hearn Generating Station, which is slated for continued investment and redevelopment along with the larger site area.

Background

As you are aware, all three levels of government have invested over \$2 billion to date on 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 current expansive network of parks and open spaces, mixed-use development supporting a diversity of land uses and new housing in the form of tall buildings is being introduced across the Port Lands.

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

The current PEC compromises the vision for our site, the Port Lands and Toronto's eastern waterfront as a whole and we welcome solutions to accommodate growth in Toronto and the Greater Toronto Area, while improving grid resilience, diversifying supply sources, and alleviating capacity strain in the Province.

"Toronto Third Line" Project

As the Port Lands and the City of Toronto continues to grow, we believe that this planned underwater transmission line is a critical piece of enabling infrastructure to support continued investment, innovation and economic strength.

We understand that in Fall 2025, the Independent Electricity System Operator ('IESO'), released its Toronto Integrated Regional Resource Plan which recommended a new underwater transmission line connecting downtown Toronto to the Darlington nuclear power plant facility via Lake Ontario. The Toronto Third Line project would be Ontario's first underwater high voltage transmission network line and its first major domestic High Voltage Direct Current project. We also understand this process is to direct the IESO to undertake a competitive procurement process and enter into a procurement contract with a transmitter to develop and construct the Toronto Third Line project with an in-service date of 2037 or sooner and that this initial consultation is to determine the parameters of seeking qualified proposals to support this infrastructure project.

Proposed Evaluation Criteria for Transmitter Selection + Procurement Contract

In regards to the proposed requirements on the evaluation criteria for transmitter selection and procurement contract, in addition to the items listed, we encourage the IESO to also include a requirement that the applicants must include a plan for how the Toronto Third Line Project delivery will minimize future land use impact on Port Lands properties. Ultimately, we should strive for a more efficient, cleaner and less impactful solution to the neighbouring properties than the existing PEC—including finding efficient solutions for any land requirements needed to support this project.

We look forward to continuing to participate in this process and ask that we be included in the next steps of this project.

Sincerely,  
**Studio of America Corporation**



Elsa Fancello, Cortel Group