

Ministry of the  
Attorney General

Civil Remedies for Illicit  
Activities Office

Legal Services Division  
77 Wellesley St. West  
P.O. Box 555  
Toronto, ON M7A 1N3

Tel: (416) 212-0556  
Fax: (416) 314-3714

Ministère du  
Procureur general

Bureau de recours civil à l'égard  
d'activités illicites

Division des services juridiques  
77 rue Wellesley ouest  
boite postale #555  
Toronto, ON M7A 1N3

Tél: (416) 212-0556  
Télééc.: (416) 314-3714



**Direct Line: 416-212-7338**

**E-mail: rosallyn.train@ontario.ca**

January 9, 2015

*Delivered by Fax and E-Mail to:*

**Ontario Energy Board**

Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 27th Floor  
2300 Yonge St.  
Toronto ON M4P 1E4

Boardsec@ontarioenergyboard.ca

*With a copy to:*

**Andy Gibbons**

Tel: 416.865.8226  
Fax: 416.865.7380  
E-mail: agibbons@torys.com  
Torys LLP  
79 Wellington St. W., 30th Floor  
Box 270, TD South Tower  
Toronto, Ontario M5K 1N2

Counsel for Union Gas

Dear Ms. Kirsten Walli, Board Secretary:

**Re: Union Gas Limited ("Union") - Application to the Ontario Energy Board for Authority to Expropriate Land in the City of Hamilton - Board File No. EB-2014-0335**

Please find enclosed the interrogatories of the Ministry of the Attorney General, Civil Remedies for Illicit Activities office (hereinafter "CRIA") in the above-noted proceeding. We have directed a copy to the Applicant.

Yours truly,

Rosalyn Train  
Counsel

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act*  
1998, S.O.1998, c.15, (Schedule B);

**AND IN THE MATTER OF** an application by Union Gas Limited for an Order pursuant to section 99(5) of the *Ontario Energy Board Act, 1998* granting authority to expropriate certain interests in one property for the purposes of constructing, operating and maintaining a natural gas pipeline between Union's existing Brantford Valve Site and the Kirkwall Custody Transfer Station.

**Interrogatories of CRIA**

1. CRIA requests that it be provided with copies of all materials and documentation previously filed and issued in connection with this proceeding, as well as all materials and documentation that may be filed and issued in connection with this proceeding in the future.
2. Is Union in possession of an appraisal and/or any other valuation of the interest to be expropriated in respect of the property municipally known as [REDACTED] (the "Property"), the registered owners of which is Manuel & Valentina Fagundes?
3. Union previously proposed that any compensation to be paid in connection with the pipeline easement at the Property, whether such compensation is payable pursuant to the *Expropriation Act* (the "Act") or otherwise, should be paid into Court in accordance with Section 38(1) of the Act. Does Union continue to support this course of action?
4. OEB Procedural Order No. 1, dated December 18, 2014, which was issued in this matter states that "The Board finds that a 30 day delay in the proceeding is unlikely to result in a resolution, given the amount of time already spent in attempting negotiations with all parties and finds that it is in the public interest to avoid any potential delay in pipeline construction." CRIA requests that it be provided with the details of such attempted negotiations as they relate to CRIA and other parties holding an interest in the Property.