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# By Electronic Mail and Courier

September 14, 2010

Ontario Energy Board 2300 Yonge Street, 27<sup>th</sup> Floor Toronto, ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Intervention Request for Coral Rapids Power on behalf of Taykwa Tagamou EB-2010-0243 – Leave to Construct Transmission Facilities for Detour Lake Power Project (Phase I – Island Falls to Detour Lake)

Willms & Shier Environmental Lawyers LLP (Willms & Shier) is environmental legal counsel for Coral Rapids Power on behalf of Taykwa Tagamou Nation.

## **REQUEST FOR INTERVENTION**

In accordance with section 23 of the Ontario Energy Board (Board) *Rules of Practice and Procedure*, and the Notice of Application and Hearing issued on August 16, 2010, we hereby request Intervenor Status for Coral Rapids Power on behalf of Taykwa Tagamou Nation in the above-noted proceeding for the Integrated Power System Plan.

## INTEREST IN PROCEEDING AND GROUNDS FOR INTERVENTION

Detour Gold Corporation is working to re-develop the Detour Lake gold project in North Eastern Ontario. The Detour Lake Power Project that is the subject of this proceeding involves building a transmission system that will service the proposed gold mine.

The Detour Lake Power Project is within the Custodial Lands and Traditional Use Territory of the Taykwa Tagamou Nation (TTN).

Taykwa Tagamou Nation has signed a Memorandum of Understanding as an interim measure to guide their relationship as they negotiate an Impact and Benefit Agreement for the Detour Lake gold project.



In addition, Detour has requested that the Detour Gold Power Project construction contractor partner with First Nations impacted by the project including TTN.

As such, the Detour Gold Power Project has the potential to impact TTN. Taykwa Tagamou Nation has a direct interest in the outcome of this proceeding, and in particular, this project as a whole.

#### NATURE AND SCOPE OF INTERVENTION

Coral Rapids Power is a company wholly owned by the Taykwa Tagamou Nation. Coral Rapids Power has been given a mandate to explore and develop hydroelectric opportunities within the Traditional Territory of the Taykwa Tagamou Nation.

The scope of Coral Rapids Power (TTN) intervention will be restricted to the concerns about potential impact on TTN interests.

## **ELIGIBILITY FOR COSTS**

Coral Rapids Power on behalf of Taykwa Tagamou respectfully requests that the Board find it eligible for costs under section 3.03(a) of the Board's Practice Direction on Cost Awards.

The Coral Rapids Power on behalf of Taykwa Tagamou is without the resources to participate in the hearing. Without funds, Coral Rapids Power on behalf of Taykwa Tagamou will be unable to ensure that it diligently exercises its part in the duty to consult.

### REQUEST FOR A WRITTEN HEARING

The Coral Rapids Power on behalf of Taykwa Tagamou requests a written hearing in order to ensure a cost effective and efficient proceeding.

### **CONTACT INFORMATION**

Coral Rapids Power on behalf of Taykwa Tagamou can be reached at:

c/o

Nancy Wood, Partner McLeod Wood Associates Inc. 125 George Street West

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Legal counsel and administrative contacts for the purposes of the hearing are:

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Attention: Tracy Richards, *Law Clerk* 

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Please don't hesitate to contact me if you have any questions about this intervention request.

Yours truly,

Juli Abouchar

Partner

Certified as a Specialist in Environmental Law

by the Law Society of Upper Canada

cc. Robert Linklater, Managing Director, Coral Rapids Power

Nancy Wood, McLeod Wood Associates Inc.

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