

October 14, 2015

**RESS, EMAIL & COURIER**

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

Attention: Ms. K. Walli, Board Secretary

Dear Ms. Walli:

**Re: Union Gas Limited - Application for Authority to Expropriate (EB-2015-0230) - Applicant Responses to Board Staff Interrogatories**

We are counsel to Union Gas Limited, applicant in the above referenced proceeding. Please find enclosed the applicant's responses to the interrogatories filed by Board Staff. The responses have also been filed through RESS.

Yours truly,



Jonathan Myers

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cc: Ms. Z. Crnojacki, OEB  
Mr. M. Murray, Union Gas  
Mr. C. Smith, Torys LLP

**Responses To Interrogatories Of Board Staff  
Union Gas Limited (“Union”)  
Application for Authority to Expropriate  
EB-2015-0230**

**Interrogatory 1**

**Reference:** Evidence, Exhibit A/Tab 1/Schedule 1/page 2/paragraph 6 and Union’s Letters to the OEB dated July 24, August 6, August 12, September 1, September 16 and September 18, 2015.

**Preamble**

Union applied for an authority to expropriate four permanent easements on four properties, owned by four landowners, and seven temporary easements on seven properties, three of which are the same as those requiring permanent easements, owned by seven landowners. In letters to the OEB, dated between July 24 and September 18, 2015, Union informed the OEB that it settled with the landowners for all the affected properties except one. Union stated that there is one remaining property that is now subject to the application for authority to expropriate.

**Question:**

- a) On the remaining property that is subject to the application, please specify the type and number of required easements and number of affected landowners.
- b) What is the status of Union’s negotiations for the remaining easement rights?

**Response:**

- a) As indicated in Exhibit B, Tab 1, Schedule 1, Appendix C, on the remaining property that is subject to the application, Union is seeking a permanent easement over an area of 0.97 ha (342 x 28 m) and temporary easements over two areas, being 0.17 ha (83 x 20 m) and 0.34 ha (342 x 10 m). There are three co-owners in respect of this property.
- b) Union is continuing to negotiate compensation issues with the remaining landowner.

**Interrogatory 2**

**Reference:** Evidence, Exhibit B/Tab 1/Schedule 1/Appendix D: Draft Plans of Expropriation

**Question:**

Referring to “Draft Plans of Expropriation”, please indicate which plans are still part of the evidence supporting the application.

**Response:**

With respect to the Draft Plans of Expropriation in Exhibit B, Tab 1, Schedule 1, Appendix D, only the plan entitled “Plan of Expropriation of PART OF LOT 10, CONCESSION 7, NEW SURVEY (Geographic Township of Nelson) now in the Town of Milton, Regional Municipality of Halton” is relevant to the property that remains subject to the Application. This plan is the 7th of the 8 plans included in Appendix D. As can be seen on that plan, it relates to PIN 24935-0006. This corresponds to the 7th property listed in Exhibit B, Tab 1, Schedule 1, Appendix C.