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November 19, 2018

SENT VIA EMAIL, COURIER AND RESS

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

Re: EB-2018-0191
Application for Leave to Construct
IAMGOLD Corporation

We are counsel to IAMGOLD Corporation in this matter.

Pursuant to Procedural Order No. 1 dated October 4, 2018, please find attached Written Reply Submissions of IAMGOLD Corporation. These have been filed on RESS and sent the Board in hardcopy.

If there are any questions, please contact the undersigned.

Yours truly,

AIRD & BERLIS LLP



Scott Stoll

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cc. Parties List

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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 IAMGOLD Corporation for an Order or Orders granting Leave to Construct new Transmission Facilities in the District of Sudbury between the proposed Côté Gold Mine in the Geographic Townships of Chester and Yeo, and the existing Hydro One Shining Tree Junction in the Geographic Township of Garibaldi and traversing the Geographic Townships of Garibaldi, Miramichi, Londonderry, Champagne, Benneweis and Chester;

WRITTEN REPLY SUBMISSIONS OF IAMGOLD CORPORATION (“IAMGOLD”)

Overview

1. IAMGOLD, a gold mining company with operating mines around the world, is developing the Côté Gold Project (the “**Mine**”) located approximately 20 km southwest of Gogama, Ontario and has applied to the Ontario Energy Board (the “**Board**”) for leave to construct the approximately 44km of 115kV transmission line and ancillary facilities (the “**Project**”) to provide electricity to its proposed Mine. IAMGOLD submits the evidence has demonstrated it meets the requirements necessary to satisfy the public interest requirements provided in Section 96(2) of the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B (“**OEB Act**”) and supports the Board granting leave to construct the Project. Board Staff supports granting leave and no party has objected to the Application.

2. In a separate but related application for leave to construct, EB-2018-0257, Hydro One Networks Inc. is seeking leave to construct upstream facilities necessary to supply the Project and the 72MW of electrical power needs of the Mine. The submissions herein pertain to this Application and the financial requirements of IAMGOLD in respect of this upstream Hydro One work.

Board Consideration

3. The Board's consideration of the Application is subject to section 96(2) of the OEB Act which states:

96 (1) If, after considering an application under section 90, 91 or 92 the Board is of the opinion that the construction, expansion or reinforcement of the proposed work is in the public interest, it shall make an order granting leave to carry out the work. 1998, c. 15, Sched. B, s. 96.

(2) In an application under section 92, the Board shall only consider the following when, under subsection (1), it considers whether the construction, expansion or reinforcement of the electricity transmission line or electricity distribution line, or the making of the interconnection, is in the public interest:

1. The interests of consumers with respect to prices and the reliability and quality of electricity service.
2. Where applicable and in a manner consistent with the policies of the Government of Ontario, the promotion of the use of renewable energy sources.

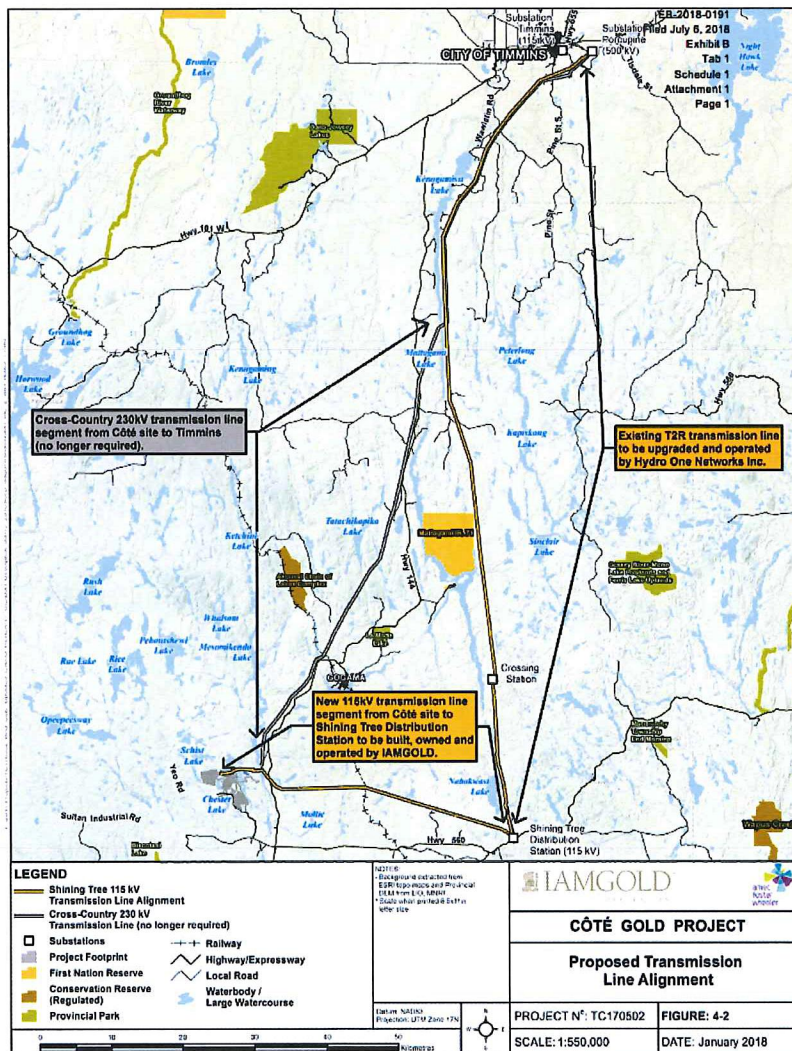
4. In the present Application, the focus for the Board is paragraph 1 of 96(2) – price, reliability and security of supply. Where an applicant demonstrates that an application has a positive impact on the interests of consumers in respect of price, reliability and security of supply of electricity, the Board is obligated by the statutory language to grant leave.

Fulfillment of the Statutory Criteria

5. IAMGOLD owns and operates several mines throughout the world and has experience in the design, construction and operation of electricity facilities and

supplies for mining activities in other jurisdictions.¹

6. An overview map of the Project showing the location of the proposed transmission line is below. The proposed route occupies an existing, but essentially abandoned transmission corridor.²



¹ EB-2018-0191, Response to Staff IR-2(a).

² Map include in evidence at EB-2018-0191, Exhibit B, Tab 1, Schedule 1, Attachment 1. More detailed maps may be found at Exhibit C, Tab 1, Schedule 1, Attachments 1 and 2.

7. The Mine will require electricity during development, construction and operation. There are no electricity transmission or distribution facilities located near the Mine with sufficient capacity to meet the requirements of the Mine.
8. The Applicant has completed a System Impact Assessment ("**Final SIA**") with the IESO. A copy of the IESO Notice of Conditional Approval of Connection Proposal ("**NOCA**") and the Final SIA was included at Exhibit F, Tab 1, Schedule 1, Attachments 1 and 2, respectively. The IESO concluded in the NOCA and the Final SIA that the connection arrangement and connection equipment are acceptable to the IESO.
9. The Customer Impact Assessment ("**CIA**") is included at Exhibit G, Tab 1, Schedule 1, Attachment 1. The CIA, at page 5, concludes that the "*Hydro One system and customers will not be adversely impacted by the connection of the Cote Lake Mine.*"
10. IAMGOLD has committed to meeting the requirements of the Final SIA and the CIA.
11. IAMGOLD is financing and constructing the Project and will contribute to the required capital for the upstream work to be completed by Hydro One as required by the Transmission System Code ("**TSC**"). IAMGOLD anticipates entering into the necessary agreements with Hydro One as required by the TSC.
12. IAMGOLD's uncontroverted evidence is the Project will have a small benefit on prices through the addition of the near continuous (24 hours per day 365 days per year) and constant load of 72MW. This will result in a more efficient use of existing grid resources which is to benefit of all.

13. The Mattagami First Nation ("**MFN**") notes that the Project will not have any short term negative impact and will provide an opportunity to provide additional reliability and security of supply for its community that would not otherwise be present. This additional opportunity, along with renewal of certain end of life Hydro One infrastructure, enhances the reliability and security of supply benefit to MFN.
14. There has been no questioning the accuracy and veracity of the technical studies and evidence of IAMGOLD. As such, IAMGOLD's evidence, including the conclusions in the Final SIA and CIA, should be accepted by the Board.
15. Therefore, from a price, reliability and quality of service perspective the Application meets the statutory requirements of Section 96(2).

Land Issues

16. Aside from the connection to Hydro One, the railway and road crossing, the entire length of the proposed Transmission Line is located on Crown land. IAMGOLD, or related parties, have claims over the entire length of the Transmission Line so no unrelated third party landowners are directly impacted by the proposed Project.
17. Access with Hydro One will be coordinated through the various agreements that will be entered into by IAMGOLD and Hydro One. In addition, IAMGOLD will pursue crossing permits to cross the railway and highway which it does not foresee any issues obtaining. IAMGOLD will obtain the necessary land rights from the province through the Ministry of Natural Resources and Forestry ("**MNR**"). IAMGOLD has had preliminary communications with MNR and does not foresee any significant issue in this regard.

18. IAMGOLD provided a form of agreement, as required by section 97 that will be offered to any third party landowner. As noted, IAMGOLD does not foresee any need to utilize this agreement because of the Crown ownership. Board Staff confirmed the form of agreement met the requirements of the Board.

Public Support and Other Issues:

19. IAMGOLD would note that Board Staff support the issuance of leave to construct by the Board.

20. MFN has taken a position that the related upstream work to be done by Hydro One should be expanded to include additional infrastructure to improve reliability and service quality for its community. Technically, IAMGOLD submits those comments are more relevant for the related Hydro One leave to construct application, EB-2018-0257, as the suggestion does not directly impact the facilities proposed by IAMGOLD in this Application. However, IAMGOLD wishes to ensure the technical feasibility of MFN's request is properly considered and would contribute up to \$50,000 to assist MFN and Hydro One's analysis. In making this commitment, IAMGOLD requires: (a) that such work does not delay the completion of construction of either IAMGOLD's Project or the work to be performed by Hydro One; (b) does not increase the ultimate cost to IAMGOLD materially; and (c) does not adversely impact any third party unduly.

21. IAMGOLD would also note the broad public support for the Project which is seen in the letters of comment from M. Serré, Member of Parliament – Nickel Belt, Members of Provincial Parliament, France Gélinas (MPP- Nickel Belt), Gilles Bisson (MPP-Timmins), Jamie West (MPP-Sudbury), Michael Mantha (MPP-Algoma Manitoulin) and local mayors: Mayor Steve Black (City of Timmins), Mayor Brian Bigger (the City of Greater Sudbury).

22. IAMGOLD recognizes that the OEB Act does restrict the jurisdiction of the Board in leave to construct applications. While there is no direct link between the substantial financial benefits to the economy provided by the Mine and the Board's jurisdiction, IAMGOLD views these as indirect benefits that improve the utilization of the broader grid and are likely to contribute to the economic well-being of other consumers and distributors.

Conclusion

23. IAMGOLD requests that the Board issue an order(s):

- a. Pursuant to Section 92 of the OEB Act granting leave to construct:
 - i. approximately 44 kilometers of 115kV transmission line;
 - ii. connection facilities at Hydro One Networks Inc.'s Shining Tree Junction;
and
 - iii. Facilities at the Mine;
- b. Pursuant to Section 97 of the OEB Act, for approval of the form of easement agreement found in Exhibit E, Tab 1, Schedule 2, Attachment 1;
- c. Pursuant to Section 101 of the OEB Act, for authority to construct works upon, over or under a highway, utility line or ditch.

24. The Application meets the statutory considerations and IAMGOLD requests leave to construct be granted at the earliest opportunity, and in any event, prior to January 15, 2019.

All of which is respectfully submitted.

DATED November 19, 2018 at Toronto, Ontario

IAMGOLD CORPORATION
By its Counsel
AIRD & BERLIS LLP



Scott A. Stoll

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