

# SCOTT PETRIE LLP

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LAW FIRM

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April 7, 2022

VIA EMAIL TO: [registrar@oeb.ca](mailto:registrar@oeb.ca)

**Attention: Nancy Marconi, Registrar of the OEB**

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

Dear Registrar:

**RE: EB-2022-0011 – Framework for Review of Intervenor Processes and Cost Awards**  
**GAPLO/LCSA/CAEPLA – Notice of Intent to Request an Award of Costs**  
**Our File No. 29843**

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I am writing on behalf of the Gas Pipeline Landowners of Ontario (“GAPLO”), the Lambton County Storage Association (“LCSA”) and the Canadian Association of Energy and Pipeline Landowner Associations (“CAEPLA”). GAPLO and LCSA are voluntary organizations of landowners directly affected by Enbridge Gas Inc. projects and facilities within the Board’s jurisdiction. CAEPLA is Canada’s leading national grassroots property rights organization and represents energy and pipeline landowners across Canada, including landowners directly affected by Enbridge Gas Inc. projects and facilities within the Board’s jurisdiction. GAPLO, LCSA and CAEPLA intend to provide comments jointly to the Board in the current consultation process and hereby notify the Board of their intention to request an award of costs.

With reference to the Board’s cost eligibility criteria set out in Section 3 of the Practice Direction on Cost Awards, it is submitted that GAPLO, LCSA and CAEPLA represent both a public interest and a policy perspective relevant to the Board’s mandate and to this particular consultation process. Landowners facing applications by companies for the construction and operation of Board-regulated projects on their properties rely on the Board’s intervenor processes and costs awards to enable their full and fair participation in the approvals processes. The landowner perspective on intervenor processes and cost awards is an important one.

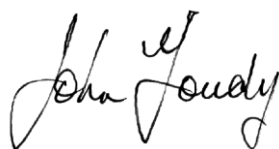
GAPLO and LCSA are voluntary organizations funded entirely through contributions by their landowner members. CAEPLA is a not-for-profit corporation funded through member contributions and through any funding obtained in connection with CAEPLA’s representation of landowner in energy project applications. None of GAPLO, LCSA and CAEPLA has any other funding available for the Board’s current consultation process.

GAPLO, LCSA and CAEPLA intend to retain me to submit comments on their behalf in the consultation process. I was called to the Bar of Ontario in 2005 and since that time have represented landowner organizations and individual landowners in several proceedings before the Board, including policy consultations and leave to construct and expropriation hearing processes. A copy of my curriculum vitae is enclosed.

I trust this is satisfactory. If the Board requires any additional information, please do not hesitate to email me or call me at (519) 433-5310, ext. 236. Otherwise, we look forward to the Board's determination on cost eligibility.

Yours truly,

**SCOTT PETRIE LLP**  
LAW FIRM

A handwritten signature in black ink, appearing to read "John D. Goudy". The signature is fluid and cursive, with the first name "John" and last name "Goudy" clearly distinguishable.

**John D. Goudy**

Encl.

c.c.: Clients

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## JOHN D. GOUDY

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### **EDUCATION**

2000 – 2004

#### *MCGILL UNIVERSITY*

- Bachelor of Laws (LL.B.)
- Bachelor of Civil Law (B.C.L.)
- Graduated with great distinction
- George S. Challies Memorial Award
- Montreal Bar Association Prize for highest standing in Civil Procedure

2002 – 2003

#### *UNIVERSITY OF EDINBURGH*

- Year-long exchange program to Faculty of Law
- First class honours in all courses of study

1996 – 2000

#### *MOUNT ALLISON UNIVERSITY*

- Bachelor of Arts (Honours) – Major in French Literature, Minor in History
- First Class Honours (*cum laude*)
- Certificate of Bilingualism
- William Tweedie Memorial Gold Medal (highest record in all subjects counting for the B.A. degree with honours)
- John Edgar Peters Prize (highest general average in the B.A. program)

1996

#### *L'ÉCOLE DE LANGUE FRANÇAISE À TROIS-PISTOLES*

- University of Western Ontario
- French Immersion Certificate (Summer Program)

### **PROFESSIONAL QUALIFICATIONS**

2005

#### *CALLED TO THE BAR OF ONTARIO*

- Awarded the Degree of Barrister-at-Law by the Law Society of Upper Canada
- Sworn in as a Solicitor of the Court of Appeal for Ontario and the Superior Court of Justice

2008

Notary Public for the Province of Ontario

## **PROFESSIONAL EXPERIENCE**

2011 – Present	Partner, Scott Petrie Law Firm, LLP
2005 – 2011	Associate Lawyer, Cohen Highley LLP
2004 – 2005	Student-at-Law, Cohen Highley LLP
2003 – 2004	Summer Student, Cohen Highley LLP
2002	Summer Student, Lerner LLP

## **AREAS OF PRACTICE**

- Civil Litigation, with an emphasis on property and environmental litigation
- Landowner representation in utility and other project applications
- Defence of Regulatory Charges
- Expropriation law
- Condominium litigation

## **RECENT PUBLICATIONS AND PRESENTATIONS**

2010 – Present	LAW OF THE LANDS – Farm, Energy and Enviro Law Blog – Legal Information for Landowners ( <a href="http://landownerlaw.blogspot.com">http://landownerlaw.blogspot.com</a> )
2019 – Present	AGRILAW published monthly in The Rural Voice
2022	Ontario Pipeline Landowners Association (OPLA) and Gas Pipeline Landowners of Ontario (GAPLO) Annual Meetings – Presentation: Pipeline Integrity Digs and CER ACE Review Update
2021	2021 London Farm Show Connect – “Agricultural Rights & the Law in Ontario”
2020-2021	Canadian Association of Farm Advisors (CAFA) – Cultivating Business – “A Litigator’s Tips for Avoiding (or Minimizing) Litigation”
2019	Country Guide, December 2019 – “Fewer farms, more of everyone else means more farm regulation and litigation”
2019	Canadian Association of Farm Advisors (CAFA) 2019 Farm Tax & Legal Update – Presentation: Sowing the seeds of litigation: what’s trending in farm property disputes

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| 2019 | Ontario Pipeline Landowners Association (OPLA) and Gas Pipeline Landowners of Ontario (GAPLO) Annual Meetings – Presentation: Pipeline Integrity Dig Agreements and NEB/CER Update |
| 2018 | Middlesex Law Association Semi-Annual Real Estate Luncheon – Presentation: Recent Decisions on (Real Estate) Solicitor’s Negligence  |

### **MEMBERSHIPS AND ACTIVITIES**

- Canadian Association of Farm Advisors (CAFA) – Member
- Ontario Expropriation Association (OEA) – Member
- The Advocates’ Society – Member
- Ontario Bar Association / Canadian Bar Association – Member
- Middlesex Law Association – Member
- Canadian Association of Energy and Pipeline Landowner Associations (CAEPLA) – Policy Advisor
- Ontario Soil & Crop Improvement Association – Member
- Ontario Federation of Agriculture – Member
- Ilderton United Church – Clerk of Session
- Ilderton Pastoral Charge – Chair of Official Board, Regional Council Representative