

June 14, 2022

Ontario Energy Board
PO Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Kirsten Walli

VIA EMAIL (boardsec@oeb.gov.on.ca)

Hydro One Networks Inc.
483 Bay Street
8th Floor, South Tower
Toronto, ON M5G 2P5
Attention: Pasquale Catalano

VIA EMAIL (regulatory@hydroone.com)

McCarthy Tetrault
421 7th Avenue SW
Suite 4000
Calgary AB T2P 4K9
Attention: Gord Nettleton

VIA EMAIL (gnettleton@mccarthy.ca)

Dear Ms. Walli,

Re: HONI Expropriation – Group Intervenor Status
Board file number EB-2022-0140

The purpose of this letter is to seek intervenor status on behalf of our landowner group, with respect to the Application for Leave to Construct pursuant to section 92 of the *Ontario Energy Board Act* and bearing OEB file number EB-2022-0140 (the “Chatham to Lakeshore Transmission Project”).

Our group of Intervenor are as follows:

1. 1066966 Ontario Inc. (c/o Robert & Carolyn Dietrich)
2. 1565714 Ontario Limited (c/o Edward, Diamantina Mariconda & John Mariconda)
3. 2368139 Ontario Inc. (c/o Matt & Marena Smyth)
4. 65871 Ontario Limited (c/o Paul Lantin)

PLEASE REPLY TO:

GODERICH	STRATFORD	KINCARDINE	PORT ELGIN	OWEN SOUND	WALKERTON
144 Courthouse Sq. Suite 100 Goderich ON N7A 1M9 P: 519.524.5532	206 Ontario St. Suite 101 Stratford ON N5A 3H4 P: 519.814.5532	943 Queen St. Kincardine ON N2Z 2Y2 P: 226.532.9700	1-1246B Goderich St. Port Elgin ON N0H 2C3 P: 226.256.7977	1717 2ND Avenue E. Suite 203 Owen Sound ON N4K 6V4 P: 519.470.6060	11 Durham St. E. Box 880 Walkerton ON N0G 2V0 P: 519.881.3230

5. 759615 Ontario Limited (c/o James & Betty Wright)
6. Baraban, June/Wilcox, Paul
7. Bob-a-Lou Farms (c/o Mike & Georgette Mailloux)
8. Bourdeau, Wayne & Karen
9. Charbonneau Farms Inc. (c/o Walter & Shelley Charbonneau)
10. Chevalier, Charles
11. Copley, David & Marilyn
12. Dampousse, Maurice, Jeanette & Giselle
13. Dekoning, Beverly & Peter
14. Dodman, Mary
15. Drew, Kevin & Debora
16. French, Peter & Donna
17. Hebert, Daniel & Cindy
18. Kerr, Bob
19. Lanoue, Gilles
20. Lantin, Paul
21. Mann Farms Inc. (c/o Ron & Terry)
22. Mann, Ron & Terry
23. Marchand, Marcel & Lori
24. Masse, Marcel & Pamela
25. Montpetit, Paul & Michelle
26. Morridell Farms Ltd (c/o Winston & Duane Morris)
27. Morris, Winston, Duane & Douglas
28. Mullen, Grace & Bernadette
29. Mullen, Timothy
30. Nagle, Linda
31. Parenti, Chiara & Franco (Franco deceased)
32. Quinton, Christopher
33. Richardson, John & Gayle
34. Schneider, Richard & Catherine
35. Scott, Paul & Helen
36. Smyth, Robert & Linda
37. T S Mullen Farms Ltd. (c/o Timothy Mullen)
38. Thibodeau, Beth & Gerard
39. Van Mar Farms (c/o Mike Buis)
40. Watson, James & Ann
41. Wright James & Betty
42. Bellamy, Stephanie & Jeffrey **(A)**
43. Sheehan, Richard & Karla **(A)**
44. Renders, Gerry & Luanne **(A)**
45. Nussey, John & Judy **(A)**
46. Biskey, Brian **(A)**
47. Tracey, Raymond **(A)**
48. Ebere, Bob & Luanne **(A)**



Our firm has been formally retained by each of the above to represent them in this process. The group has been and shall continue to be known, for the purposes of hearings before the Ontario Energy Board, as; "The Ross Firm Group".

Intervenor Interest:

Everyone listed above is directly affected by the proposed Chatham to Lakeshore Transmission Project. In the vast majority (43 properties) of instances, Hydro One Networks Inc. ("HONI") proposes a taking of their land in furtherance of the project. The remainder of our group (6 properties) are made up of directly abutting landowners. For ease of reference this latter designation is marked with an '(A)' after their names above.

Nature and Scope of Participation:

It is the Ross Firm Group's intention to attend at and/or participate in any hearing, step or thing set by the Board. The Ross Firm Group intends on testing the evidence in support of HONI's position that the project and resultant expropriation of land is in keeping public policy generally, that the route chosen is the best considering existing land use policy and whether the technologies advanced by HONI are most suited to the project. Finally, we will be seeking to investigate whether in light of parallel s.96.1 Orders In Council advancing related transmission projects, HONI should have considered the increased transmission capacity demanded by the region with a more comprehensive lens.

Requirement for an Oral Hearing:

Given the nature and complexity of this process we submit that oral evidence and the opportunity to question the witnesses providing that evidence is essential in allowing our group the occasion to test the merits of HONI's Application.

Further, and perhaps more importantly, an oral hearing would allow, depending on Board scheduling, for a faster process. Given the submissions in HONI's instant Application, it is clear that the Applicant also wishes to expedite the process as much as possible. From the landowner perspective, this matter has been going on for over a year at no small cost, emotional energy and time spent by the group members. It has been made clear to this writer that our group is not only concerned with ensuring that HONI has met its regulatory requirements before moving to expropriation, but that the process move forward with as much certainty as possible.

Eligibility for Costs:

The Ross Firm Group relies on paragraph 3.03(c) of the *Ontario Energy Board – Practice Direction on Cost Awards*. Our purpose of participation in this Application shall be to represent persons with an interest in land that is affected by the subject application. The decision whether to grant authority to expropriate our clients' lands makes our group eligible not only for intervenor status but also for reasonable costs awards.

Language:



We will not require the hearing to be conducted in the French language.

We trust the foregoing is satisfactory.

Yours very truly,

the ross firm.
PROFESSIONAL CORPORATION

Per:



Quinn M. Ross

qmross@rossfirm.com

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QMR/dbg

