Ontario Energy Board
Registrar’s Office
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Filed through RESS and email

Subject: Motion to Remove Properties from Expropriation Process – EB-2024-0319

Dear Registrar,

I, Kurt Krause, an intervenor in the matter of Hydro One Networks Inc.’s application for approval to expropriate certain lands under EB-2024-0319, hereby submit this motion requesting the removal of my properties from the expropriation process on the following grounds:

**1. Hydro One’s Failure to Provide Proper Documentation in a Timely Manner**

My legal counsel has repeatedly sought finalized versions of the agreements necessary to voluntarily settle this matter. However, Hydro One has failed to provide complete and accurate documentation, including compensation details, which has prevented me from signing any agreement. Communications from my legal representatives confirm that key contractual terms, including compensation amounts, remain incorrect or incomplete despite multiple requests for corrections.

**2. Good Faith Efforts to Reach a Voluntary Agreement**

I have demonstrated a willingness to negotiate and finalize an agreement in good faith. My legal counsel has reviewed draft agreements and provided Hydro One with requested revisions, but Hydro One’s failure to provide properly completed agreements has obstructed the signing process.

**3. Prejudice Resulting from Hydro One’s Delays**

As noted in Procedural Order No. 3, voluntary agreements are a preferred method for acquiring land rights. Hydro One’s failure to provide proper documentation has put me in a position where expropriation is proceeding despite my readiness to finalize an agreement. It is unfair and prejudicial to allow expropriation to proceed when the delay is due to Hydro One’s failure to provide complete contracts.

**4. Request for Relief**

Given the above, I respectfully request that the OEB:

1. Remove my properties from the expropriation process pending Hydro One’s provision of accurate, finalized agreements.
2. Provide an opportunity for voluntary settlement by requiring Hydro One to submit corrected agreements for my review before proceeding further with expropriation.
3. Extend any applicable deadlines to allow for proper contract review and execution.

I appreciate the OEB’s attention to this matter and request that this motion be considered on an expedited basis. Please advise if any additional information is required.

Best Regards

Kurt Krause

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