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Via Email and RESS

Ms. Nancy Marconi
Registrar
Ontario Energy Board
Suite 2700, 2300 Yonge Street
P.O. Box 2319
Toronto, Ontario, M4P 1E4

Dear Ms. Marconi:

**Re: Hydro One Networks Inc. (Hydro One)
St. Clair Transmission Project Section 99 Expropriation Authorization Application
OEB File Number: EB-2025-0093**

We are legal counsel to Hydro One Networks Inc. ("Hydro One"), the Applicant in the above-referenced proceeding. In accordance with Procedural Order No. 2 dated June 10, 2025, Hydro One provides the following submission with respect to the draft Issues List appended as Schedule A.

Hydro One supports OEB Staff's proposed Issues List. These issues are consistent with the recently adjudicated Waasigan Phase 1 Expropriation proceeding reviewed under docket EB-2024-0319. In Hydro One's view, there is no material difference in the relief sought in this Application relative to the Waasigan Phase 1 Expropriation application. The core issue in these and all other section 99 applications, concerns the nature of the land interest contemplated to be the subject-matter of the expropriation authorization relief. The Waasigan and St. Clair Transmission Line projects are both priority transmission projects¹, and were found to be in the public interest with respect to price, reliability and quality of electricity service². The general routing for both projects were defined through an approved environmental assessment process. None of these public interest determinations should be disturbed or reconsidered through the current proceeding.

The assessment of "public interest" in the context of an application seeking expropriation authorization relief is understood by Hydro One to be narrow in scope and focused strictly upon the nature and scope of the proposed taking Hydro One seeks in order to construct the approved

¹ The St. Clair Transmission Line Project was designated as a priority project by the Minister of Energy with the approval of the Lieutenant Governor in Council (OIC No. 876/2022). The Waasigan Project (formerly Northwest Bulk Transmission Line) was documented as a priority transmission project in the Minister of Energy's 2013 Long-Term Energy Plan and Letter to Hydro One dated December 11, 2013.

² EB-2024-0155 St. Clair Transmission Line Leave to Construct Decision and Order, dated December 10, 2024.
EB-2023-0198 Waasigan Leave to Construct Decision and Order, dated April 16, 2024.

St. Clair Transmission Line Project. With this in mind, Hydro One submits the proposed issues are appropriate for the Board to hear and assess all remaining relevant public interest aspects.

Similarly, Hydro One does not support the introduction of any issues that may pertain to determining the specific compensation, the principles that are applied to determine compensation, the process through which those principles were developed, the application of those principles in determining compensation, or the reasonableness of compensation offers. Hydro One agrees with the Board's previous rulings that these matters are beyond the scope of the expropriation authorization relief sought in this proceeding.

Should a party propose to remove, change or limit the scope of an issue on the draft Issues List, Hydro One requests the right to respond to any such submissions should the OEB deem that there's merit in exploring these proposals.

Yours truly,

McCarthy Tétrault LLP



Gordon M. Nettleton
Partner | Associé

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