

BY E-MAIL

June 27, 2025

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ritchie Murray:

**Re: Hydro One Networks, Inc. (Hydro One) – St. Clair Project Expropriation
Application
OEB File No. EB-2025-0093
OEB Staff Interrogatories to Applicant**

In accordance with Procedural Order No. 1, please find attached the OEB staff interrogatories for the above proceeding. The applicant and intervenors have been copied on this filing.

Hydro One's responses to interrogatories are due by July 11, 2025. Responses to interrogatories, including supporting documentation, must not include personal information (as that phrase is defined in the Freedom of Information and Protection of Privacy Act), unless filed in accordance with rule 9A of the OEB's Rules of Practice and Procedure

Yours truly,

Original signed by

Abla Nur
Analyst, Generation and Transmission

Hydro One Networks, Inc. (Hydro One)

**St. Clair Project– EXPROPRIATION APPLICATION
EB-2025-0093**

OEB STAFF INTERROGATORIES

Staff-1

Reference 1: EB-2025-0093, Exhibit A, Tab 1, Schedule 1, Page 3

Reference 2: Appendix 1, EB-2024-0155 Decision and Order, Page 14

Preamble

At Reference 1, Hydro One states that permanent easements of up to 46 metres in width are being sought to accommodate the new line.

At Reference 2, Hydro One also states that approximately 80% of the St. Clair Transmission Line route follows an existing transmission corridor in order to minimize environmental and socioeconomic impacts. Part of the route involves upgrading an existing 115kV transmission line corridor to a 230 kV double circuit line.

Questions

- a) Please confirm the subject properties are located within the approved route referred to in Reference 1.
- b) For each of the subject properties, please indicate any existing legal interest currently held by Hydro One (e.g., easement, right of way, etc). For each interest, please describe the nature of that interest and explain whether the proposed expropriation would expand, duplicate or replace that existing interest.
- c) For each of the subject properties, please confirm whether the requested easement lies entirely within the existing Hydro One transmission corridor and existing 115 kV right-of-way.
- d) If any part of the requested easement extends beyond the existing corridor or right-of-way, please identify the affected properties and describe the extent and purpose of the additional land interests required.
- e) For each of the subject properties, please explain the criteria and standards that Hydro

One applied to determine the size of the Right-of-Way. On what basis does Hydro One establish that it seeks the minimum amount of land rights necessary to implement the transmission project?

- f) For any property on the existing transmission corridor, where the requested permanent easement exceeds the width occupied by the existing 115 kV line, please explain the technical rationale for requiring the additional width.

Staff-2

Reference 1: EB-2025-0093, Exhibit A, Tab 1, Schedule 1, Page 3

Reference 2: EB-2024-0155, Decision and Order, Schedule B: Standard Conditions of Approval for Electricity Leave to Construct Applications

Preamble

At Reference 1, Hydro One indicated that it planned to start the construction of the St. Clair Project by December 2025. Hydro One requested the OEB's decision by August 2025.

Questions

- a) Please confirm whether Hydro One has fulfilled all conditions of approval set out in Reference 2, including obtaining "all necessary approvals, permits, licences, certificates, agreements and rights required to construct, operate and maintain the project." If any conditions have not been fulfilled, please explain why, explain how Hydro One plans to fulfill them, and provide an estimate of the date Hydro One expects to fulfill them.
- b) Please provide a current estimate of the planned start date for construction of the Project if the date is different from the December 2025 date set out in the application.

Staff-3

Reference 1: EB-2025-0093, Exhibit 1, Tab 1, Schedule 1, Page 4

Reference 2: EB-2025-0093, Appendix 4 – Description of Lands and Specific Interests in Lands over which Authority to Expropriate is being Requested, Page 1

Reference 3: EB-2024-0319, Hydro One Staff IR Responses, Exhibit I-1-2, Attachment 2 – Records of Consultation, Page 1

Reference 4: EB-2025-0093, Updated Application, Exhibit A, Tab 1, Schedule 1

Preamble

At Reference 1, Hydro One stated that it “notified all directly affected landowners impacted by the Project of its intention to present offers to voluntarily acquire land interests required for the Project.” Hydro One also stated that all voluntary offers presented to landowners were consistent with Hydro One’s St. Clair Project Land Acquisition Compensation Principles.

Hydro One also stated that as of May 23, 2025 (Reference 4), landowners of 89 of the privately held properties have signed voluntary agreements for permanent easement interest for the Project and that discussions are continuing with the landowners of the 5 remaining privately held properties.

Questions

- a) Please provide an update on the status of negotiations with the registered landowners of the subject properties in the format of Reference 2, as well as a record of consultation as provided in the Waasigan Expropriation proceeding (EB-2024-0319) as shown in Reference 3.
- b) For landowners who have not reached an agreement with Hydro One, please identify what form of agreement was initially offered, whether any modifications to the standard form were proposed or requested by the landowner, and if so, what those modifications were and whether Hydro One accepted or rejected said modifications.
- c) Please comment on the form of agreements that Hydro One offered to the registered landowners who are not private individuals, such as Crown and government agencies.

Staff-4

Reference 1: Ontario Energy Board Act, s.23

Reference 2: EB-2024-0319, Decision and Order, Schedule B, Conditions of Approval

Preamble

Hydro One applied for an order granting it the authorization to expropriate certain rights for certain lands pursuant to section 99 of the OEB Act. Reference 1 permits the OEB, when making an order, to “impose such conditions as it considers proper.”

Question

- a) OEB staff has prepared the following draft Conditions of Approval based on the OEB’s findings in Reference 2. If Hydro One does not agree to any of the draft conditions of approval noted below, please identify the specific conditions that Hydro One disagrees with and explain why. For conditions in respect of which Hydro One would like to recommend changes, please provide the proposed changes with supporting rationale.

**St. Clair Project – Expropriation Application
Section 99 Order Granting Authority to
Expropriate Interests in Certain Lands**

DRAFT CONDITIONS OF APPROVAL

1. Hydro One shall notify the OEB in writing in the event that, after this Decision and Order has been issued, a negotiated settlement is reached and expropriation is no longer necessary. This notice shall be filed with the OEB within ten days of the settlement.
2. Hydro One shall use all reasonable efforts to provide oral and written notice to the landowners a minimum of 48 hours prior to the initial entry onto the land.
3. Hydro One will reasonably attempt to accommodate landowner or tenant property operations when Project construction activities take place, subject to the Project's health, safety and security policies and procedures and the Occupational Health and Safety Act.
4. Hydro One or its agents will consult with the landowner in advance of entry as to the manner in which existing gates / fences / entryways are to be managed while entering property. In the event the landowner cannot be contacted, Hydro One shall ensure that gates / fences / entryways used by Hydro One personnel or its agents are left as found.
5. Upon providing Hydro One with reasonable prior notice, the landowner(s) and tenant(s) can be present to observe the transmission facilities' construction and associated activities subject to the Project's health, safety and security policies and procedures and the Occupational Health and Safety.
6. No later than *(2 weeks after decision issued, if expropriation is approved by OEB)*, Hydro One shall file a summary of the general record keeping requirements it will implement for all project lands, ensuring that the requirements are consistent for land interests acquired through both voluntary agreements and expropriation, excluding any special record keeping requirements that may have been agreed to in an individual.
7. Hydro One shall designate one of its employees as project manager who will be responsible for the fulfillment of these conditions, and shall provide the employee's name and contact information to the OEB and to the landowners and tenants, and shall ensure that this information is clearly posted on Hydro One's construction site office. The project manager will be responsible for the fulfilment of the conditions of approval on the site.
8. Hydro One shall furnish the OEB's designated representative with all reasonable assistance for ascertaining whether Hydro One has complied with these conditions of

approval.

The OEB's designated representative for the purpose of these Conditions of Approval shall be the OEB's Manager of Generation and Transmission Applications (or the Manager of any OEB successor department that oversees leave to construct applications).