

HYDRO ONE NETWORKS, INC. (“Hydro One”)
St. Clair Project – EXPROPRIATION APPLICATION
EB-2025-0093
SISKINDS FIRM GROUP INTEROGATORIES

WRITTEN INTERROGATORIES FROM SISKINDS LLP

Pursuant to the Ontario Energy Board’s Procedural Order No. 1 dated May 29, 2025, Siskinds LLP submits the following interrogatories:

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

Hydro One indicates that the new 230-kilovolt double-circuit transmission line will be located in southwestern 7 Ontario in the Municipality of Chatham-Kent and Lambton County near the 8 communities of Chatham-Kent and St. Clair. The total line length of the Project is 9 approximately 64 kilometres and will run from the existing Lambton TS located 10 approximately 4.5 kilometres south of Courtright, Ontario, and terminate at Chatham 11 SS located approximately 700 metres north of Hwy 401 in Chatham, Ontario. Station 12 modifications at Lambton TS, Wallaceburg TS, and Chatham SS will also be required 13 to accommodate the transmission line.

1. Please confirm why it is necessary to extend the requested easement / charge in certain areas beyond the existing Hydro One transmission corridor and existing right-of-way? More specifically, why is it not possible to remain within the existing Hydro One transmission corridor instead of proposing a “new” line such as CK-51?
2. Why was it not possible for Hydro One to follow the existing transmission corridor throughout the entirety of the Project and specifically in the areas of the proposed “new” transmission line?

Reference: EB-2025-0093, Appendix 1, EB-2024-0155 Decision and Order page 14

The OEB noted that detailed route selection was determined in the EA process and that Hydro One carried out consultations with municipal, provincial, and federal government officials and agencies, Indigenous communities, potentially affected and interested persons, businesses, and interest groups and examined route options that were based on social, technical, environmental, and cost considerations.

1. As part of the consultations conducted did Hydro One reach out to the landowners of the active agricultural operations in the area to specifically discuss the impacts of the proposed Project on the active farming operations? For example, was the potential loss of existing contracts, and loss of the ability to grow specific crops as a result of the location of Hydro One’s transmission line considered and assessed in determining the preferred route?

2. How many landowners of agricultural properties consulted indicated that they would experience a significant loss in crop potential as a result of the Project? What, if any, steps were taken by Hydro One to minimize the impact of the proposed Project on the agricultural properties?
3. To what extent is Hydro One expanding its existing interest on any agricultural properties situated within the Project area?
4. In determining the impacts on a specific property did Hydro One consider the number of new towers required and the total number of towers situated on any on specific property? If yes, what rating or criteria were applied based by the number of towers and how is this reflected in the standard form of agreement?
5. Did Hydro One take into consideration the impacts of the construction of the towers that are likely to require a depth of approximately 20 metres for the helical piles on the potable drinking water wells located in, or in the area of the Project? If yes, what possible impacts were considered and how were they evaluated?
6. What, if any, potential adverse effects were taken into account on the potable drinking water wells situated in, or in the vicinity of, the Project?
7. Were the potential adverse effects of the siting of the towers on the various landowners taken into consideration? If yes, please provide a list of the potential adverse effects considered and the rating or evaluation criteria applied.
8. Did Hydro One only require the minimum amount of land rights necessary to support the transmission project?

Reference: EB-2025-0093, Exhibit A, Tab 1, Schedule 1
EB-2024-0155, Decision and Order, Schedule B: Standard Conditions of Approval
for Electricity Leave to Construct Applications

1. What, if any, approvals, permits, licenses, certificates, agreements and rights required to construct, operation and maintain the Project remain outstanding as of June 30, 2025?
2. What, if any, material changes have occurred in the Project since the rendering of the Decision and Order in EB-2024-0155?

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

1. Have there been any modifications to the standard form of agreement offered by Hydro One to any of the landowners? If, yes, please describe those modifications.
2. As part of its standard form of agreement has Hydro One provided compensation for any unique situations existing on the property such as any required drainage systems and pumps necessary to ensure the lands remain dry and not flooded?
3. Have there been any modifications standard form of agreement requested by the landowners impacted by the Project? If yes, what were those modifications and on what basis were they accepted or rejected?
4. Please confirm the number of towers placed on a property as a result of the Project are reflected in the compensation package?
5. Were annual payments similar to those provided by oil / gas companies considered as part of the standard form of agreement? If not, why not?

TO: Hydro One Networks Inc.
Eryn MacKinnon
Regulatory Advisor
Hydro One
Networks Inc.
483 Bay Street, 7th Floor - South
Tower Toronto, ON M5G 2P5
regulatoryaffairs@hydroone.com

Carla Molina
Sr. Regulatory Coordinator
regulatory@hydroone.com

Applicant Counsel,
Gordon Nettleton
McCarthy Tétrault LLP
4000, 421 – 7th
Avenue SW Calgary
ON T2P 4K9
Tel: 403-260-3622
Fax: 403-260-3501
gnettleton@mccarthy.ca

Monica Caceres
Assistant General Counsel
Hydro One Networks Inc.
483 Bay Street, 8th Floor - South
Tower Toronto ON M5G 2P5
monica.caceres@hydroone.com

AND TO: REGISTRAR
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th
Floor Toronto ON M4P 1E4
Registrar@oeb.ca

Case Manager, Andrew Bishop
andrew.bishop@oeb.ca

OEB Counsel, Micheal Miller
michael.millar@oeb.ca

Abla Nur
abla.nur@oeb.ca