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September 18, 2025

## Via Email and RESS

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

Dear Mr. Murray:

Re: Hydro One Networks Inc. ("Hydro One")

**Application for Expropriation Near City of Port Colborne** 

Reply to Nyon's Surreply Submissions

OEB File Number: EB-2024-0142

In accordance with Procedural Order No. 3, Hydro One Networks Inc. ("**Hydro One**") provides this reply to the surreply submissions of the Intervenors, Nyon Oil Inc. and 1170367 Ontario Inc. (together, "**Nyon**"), dated September 5, 2025 (the "**Surreply**").

In Procedural Order No. 3, the Board declined to make a finding as to the propriety of Hydro One's Reply Submissions and noted that Nyon had already filed the Surreply despite having ostensibly sought leave to do so. The Board granted Hydro One leave to file a reply to Nyon's Surreply, should it choose to do so. Hydro One does not concede that Nyon's Surreply was warranted or that there were any deficiencies in Hydro One's reply. Rather, Hydro One's Reply was a proper reply, which was responsive to the submissions advanced by Nyon in its submissions and did not raise "new theories and arguments" as alleged by Nyon.

In any event, all of Nyon's submissions in Surreply have been canvassed extensively in the record and submissions filed to date, and no further reply is required. Hydro One continues to rely on its Argument in Chief and Reply Submissions, which are sufficient to address all of the issues addressed (at times, readdressed) in Nyon's Surreply.

Yours very truly,

Sam Rogers Partner | Associé