

Reply to the Attention of: Marc Kemerer
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Our File No.: 297087
Date: March 11, 2026

EMAIL

Ontario Energy Board

Suite 2700, 2300 Yonge Street
P.O. Box 2319
Toronto, ON M4P 1E4

**Attention: Ritchie Murray, Deputy
Registrar**

Dear Mr. Murray,

Re: **EB-2025-0314 – Letter of Grant Lake dated March 10, 2026**

We are in receipt of the 10 March 2026 letter from Mr. Mondrow on behalf of the intervenor, Grant Lake, requesting that the OEB reconsider its procedural directions set out in Procedural Order No. 2 issued on 6 March 2026 in order to allow for:

1. the bringing of a motion to compel further responses to certain interrogatories; and
2. the proceeding to an oral hearing following additional discovery and the filing of further evidence by Grant Lake.

Mr. Mondrow proposes to file such a motion on 19 March 2026, which is also the date currently scheduled for the filing of the Applicant's written submissions pursuant to Procedural Order No. 2.

The Applicant objects to these requests.

The Applicant provided detailed and comprehensive responses to the interrogatories submitted by Grant Lake. In the Applicant's submission, the responses fully address the information requested and provide Grant Lakes with a clear understanding of the Applicant's position on the matters in this proceeding, including the issues referenced in Mr. Mondrow's letter.

The Applicant's responses to interrogatories were filed on 26 February 2026 . Since that time, Grant Lake has had sufficient opportunity – 12 days - to review the interrogatory responses and to raise any concerns regarding their sufficiency. Significantly, Grant Lakes provided no information let alone explanation supporting why such concerns can only be described – even summarily – up to 9 days after (and not as part of) its March 10 letter submission, and a full 21 days after receiving the Applicant's responses to interrogatories.

In the circumstances, we find that absence of any credible explanation supporting a Motion request to be remarkable, particularly given the time that has elapsed since the interrogatory responses were provided and the straightforward nature of the OEB's motion process as it relates to interrogatory responses. If Grant Lakes believes that particular responses are deficient, those concerns could and should have been raised promptly following the February 26 filing of responses, and not only as a delay tactic in response to the schedule directed by the OEB in Procedural Order No. 2.

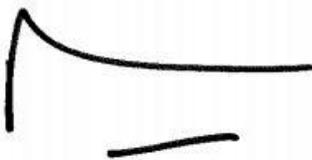
In these circumstances, the Applicant submits that the request to bring a motion at this stage of the proceeding would unnecessarily delay the orderly progress of the application.

The Applicant also notes that expropriation proceedings before the OEB have been typically heard in writing and oral hearings have been conducted only in exceptional circumstances. Nothing in Mr. Mondrow's letter identifies any issue that cannot be addressed within the written hearing process established by Procedural Order No. 2.

Accordingly, the Applicant respectfully submits that the requests set out in the March 10, 2026 letter should be denied and that the proceeding should continue in accordance with the schedule established by the OEB.

In the alternative, should the OEB be inclined to permit Grant Lake to bring such a motion, the Applicant respectfully requests that the OEB direct that any motion materials be filed by no later than 12 March 2026. The Applicant wishes to proceed with the current schedule for final arguments and is prepared to file its argument in chief on 19 March 2026 as directed by Procedural Order No. 2.

Yours truly,

A handwritten signature in black ink, consisting of a large, stylized initial 'M' followed by a horizontal line that tapers to the right, and a shorter horizontal line below it.

Marc Kemerer