

From: Ontario Energy Board <webmaster@oeb.ca>

Sent: Thursday, April 23, 2026 7:12 PM

To: Office of the Registrar <Registrar@oeb.ca>

Cc: paula.lombardi@siskinds.com

Subject: Intervention Form: EB-2026-0083 - Donald John McInnis

Intervention Form

Case Number:

EB-2026-0083

Requesting information on behalf:

Not specified

Intervenor Name:

Donald John McInnis

Mandate and Objectives:

The intervenor is a landowner significantly impacted by the St. Thomas Transmission Line Project (the "Project"). The Project is the construction and operation of a new 230 kilovolt double-circuit transmission line that spans approximately 18 kilometers from the existing 230 kilovolt transmission corridor north of Highway 401 in the City of London to the new Centennial Transformer Station located in the City of St. Thomas. Our Client is directly impacted by the Project as Hydro One Networks Inc. ("HONI") is proposing the taking of a portion of our Client's land to facilitate the construction and development of the proposed Project. There are significant demands for agricultural lands from industry and the associated infrastructure projects having major impacts on Ontario's farming operations such as the case here. Electrical infrastructure along is potentially consuming a footprint of 1.5 to 2 million acres of agricultural lands by 2050 according to the IESO. The Project connects an existing hydro corridor north of Highway 401 in the City of London to the Yarmouth Industrial Park. The Project supports major projects such as the PowerCo battery plan and Vianode and we understand its purpose and intention is to attract other industry to the area. HONI has confirmed that Project is required to meet the forecasted electricity demand of a battery cell manufacturing facility and exclusively paid for by the customer. In addition, the evidence is complex and technical in nature, and an oral hearing allows for the appropriate explanation,

assessment, review, and detail of the information and technical evidence being presented. We would suggest that an oral hearing is the appropriate manner of testing the evidence to ensure that the Project is confirmed to be for a public purpose and the proposed expropriation warranted in the circumstances. Our Client should be provided the opportunity to present their views, concerns as they relate to the proposed Project and expropriation of their lands. Administrative fairness ensure that the principles of natural justice are upheld and maintained and ensures that any decision made that impacts the rights of individuals occur in a fair and unbiased manner. The objectives of our Clients is to ensure that the proposed expropriation is in the public interest and meets the requirements and objectives of the Expropriations Act as it relates to our Clients' properties.

Membership of the Intervenor and Constituency Represented:

Our Client is the property owner being represented.

Programs or Activities Carried Out by the Intervenor:

The intervenor operates a farming operation on the lands.

Governance Structure:

Our Client provides instructions to Siskinds LLP who represent their interests.

Representatives:

Paula Lombardi
paula.lombardi@siskinds.com
5196607878

Cost Claim Filing contact:

Paula Lombardi
paula.lombardi@siskinds.com
5196607878

Other Contacts:

Frequent Intervenor Form:

Add all individuals listed on our Frequent Intervenor Form as contacts for this proceeding:

N/A

Names and email addresses of individuals to be added as contacts for this proceeding:

N/A

OEB Proceedings:

Item Description	Category	Status
EB-2025-0093	Electricity – Leave to Construct	Granted
EB-2024-0155	Electricity – Leave to Construct	Granted

Issues:

Issues: Siskinds LLP, on behalf of our Client will attend and participate in any hearing before the Board as it relates to the above noted Project and our Client's intervenor status. The goal of our Client's participation is to review the evidence submitted by HONI and ensure that the Project and expropriation of our Client's lands complies with its regulatory obligations including but not limited to falling within the statutory exception that leave be obtained to engage in the construction and operation of the new 230 kilovolt transmission corridor under the provisions of section 6.2(1)(e.1) as set out in Ontario Regulation 161/99. The Project connects an existing hydro corridor north of Highway 401 in the City of London to the Yarmouth Industrial Park. The Project supports major projects such as the PowerCo battery plan and Vianode and we understand its purpose and intention is to attract other industry to the area. HONI has confirmed that Project is required to meet the forecasted electricity demand of a battery cell manufacturing facility and exclusively paid for by the customer. The following issues should be properly included in the issues list: A. Is Hydro One relying on the customer connection exemption as a way to avoid a fulsome leave to construct, but engineering it in a manner that goes beyond the identified need? B. Is the purpose of the Project entirely for the one customer and is that in the public interest to justify expropriation? C. What stakeholder engagement occurred in the development of the LACPs? D. Is the interference of the Project on the property owned by our Client reasonable and in the public interest. In this case, taking into consideration that this is a merchant line is it reasonable for our Client to bear and

shoulder a greater share the burden of the Project and suffer impacts on their Property for what has been confirmed to be a merchant line targeted for one customer. E. Is the proposed Project being developed to support other customers in the area confirming it is not just for one customer as suggested. Also, please also see intervenor request letter.

Policy Interests:

Our Client is a landowner being directly impacted by any expropriation proceedings which will have significant impacts on the agricultural operations and are not primarily representing a policy interest in the proceedings.

Hearings:

The proposed Project is complex with numerous intricacies and several interconnected parts and impacted parties and considerable technical information and details. With that in mind we request an oral hearing with oral evidence. This is the preferred method of hearing as it provides and opportunity to appropriately test the evidence brought forward considering the breadth of our Client's concerns. In addition, the evidence is complex and technical in nature and an oral hearing allows for the appropriate explanation, assessment, review, and detail of the information and technical evidence being presented. We would suggest that an oral hearing is the appropriate manner of testing the evidence to ensure that the Project is confirmed to be in the public purpose. Our Client should be provided the opportunity to present their views, concerns as they relate to the Project. Administrative fairness ensure that the principles of natural justice are upheld and maintained and ensure that any decision made that impacts the rights of individuals occur in a fair and unbiased manner. Our Client should be provided the ability and right to have their views heard in the processes that affect them, and any decision made without concern of bias or an apprehension of bias. The decision on the proposed Project should take into consideration our Client, and the other intervenors, needs and circumstances based on the relevant information as it relates to the continued and ongoing use and enjoyment of their lands. Further the oral hearing ensures a fulsome consideration of our Client's views, information and evidence including a proper assessment of the impacts of the proposed Project on our Client. HONI bears the onus of ensuring that our Client and the other intervenors views are appropriately taken into account in making any decision on the proposed Project. Our Client is significantly impacted by the proposed Project and their interests ought to be properly taken into consideration and heard by the Board. A written hearing would result in prejudice to our Client who has neither the time, resources, or technical skill to fully engage in a written hearing and understand the evidence and technical information being presented. As part of HONI's procedural fairness requirements our Client has the right to present their views and concerns on the proposed Project before an unbiased, neutral decision maker. If awarded intervenor status we will ensure that our Client's concerns and views are presented in an efficient, straight forward, and timely manner. The Board's decision on this Project significantly impacts our Client in terms of the ability to continue to freely use and enjoy their property and continue with their business operations unencumbered. The Board has a positive obligation to ensure that the parties impacted by the proposed Project including our Client has a right to make their submissions and comments heard and have those submissions meaningfully considered as part of the Board proceedings. The Board has a positive obligation to conduct its operations in fair and transparent matter being accountable to all its consumers and those carrying out its mandate. The Board's own Framework for Review of Intervenor Processes and Costs Awards (the "Framework") confirms the significant benefit brought by

intervenor status to the proceedings. Respectfully, we submit that procedural fairness and the rights and impact of the proposed Project on our Client ought to be properly balanced with the obligations of HONI as they relate to the proposed Project and their customers. In these circumstances it is only reasonable that we be granted intervenor status to represent our Client's interests and rights as they relate to the proposed Project and impact on their lands and business operations and any hearing on the matter be scheduled as an oral hearing.

Evidence:

As a high level overview the proposed evidence includes: Our Client will submit evidence of their farming operation and the impact of the Project on their agricultural business operation. Our Client will provide evidence of the required ongoing draining and pumping of the property, all of which is impacted by the numerous towers being sited on the property. Information will also be provided evidencing the unreasonable burden that is being placed on the our Client as it relates to the Project as compared to other landowners in the area.

Coordination with Other Intervenors:

We will work actively with other intervenors by contacting them to discuss the issues being raised and coordinating the submissions of the various entities / individuals who are granted party status.

Cost Awards:

The goal of our intervention is to represent our Clients who are directly impacted by the proposed Project and have both a personal and business interest in the lands required by HONI to facilitate the proposed Project. We will discuss submissions and work collaboratively with other intervenors to ensure no duplication in the submissions at the hearing. We note that our Client is a landowner directly affected by the Project, we can advise that: - Our Client will participate responsibly in the process; - The submissions that will be filed by our Client are to assist the OEB in understanding the issues being raised by our Client including but not limited to the impacts on their farming operation and the burden being placed on our Client; - We will actively take steps to ensure that our submissions were not repetitive and focused on relevant material issues. - Our Client has not engaged in any conduct that would be deemed inappropriate or irresponsible.

Language Preference:

The preferred language request for the hearing is English