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

**Sent:** Friday, April 24, 2026 10:28 AM

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

**Cc:** qmross@rossfirm.com

**Subject:** Intervention Form: EB-2026-0083 - Ross Firm Group

# Intervention Form

## Case Number:

EB-2026-0083

## Requesting information on behalf:

Of an organization

## Intervenor Name:

Ross Firm Group

## Mandate and Objectives:

The Ross Firm Group, also referred to as RFG, is an ad hoc group of directly affected landowners and landholding entities represented by The Ross Firm Professional Corporation for the purpose of participating in OEB proceeding EB-2026-0083. RFG's mandate is to protect and advance the legal and property interests of its members in relation to Hydro One Networks Inc.'s request for authority to expropriate interests in land for the St. Thomas Transmission Project. RFG's participation is directed to the proposed expropriations and the terms of any authorization that may be granted by the OEB. RFG does not seek to have the OEB determine compensation. RFG's objectives are to ensure that the OEB has the benefit of direct landowner participation and, where appropriate, landowner evidence and submissions concerning the proposed expropriation. RFG intends to address whether the requested expropriation authority is in the public interest, whether the lands and land rights proposed to be taken are no greater than reasonably necessary, whether the legal interests sought are the minimum interests required for the Project, and what conditions, if any, should be attached to any OEB order authorizing expropriation.

## Membership of the Intervenor and Constituency

## **Represented:**

RFG is comprised of directly affected landowners and landholding entities whose lands or land interests are proposed to be affected by the St. Thomas Transmission Project. The group includes persons and entities with ownership or other legal interests in lands located along or near the proposed transmission corridor between the City of London and the City of St. Thomas. The constituency represented by RFG is directly affected landowners and rights-holders whose property rights, land use, access, farming, residential, commercial, estate, or landholding interests may be affected by the proposed expropriation of permanent or temporary land rights for the Project.

## **Programs or Activities Carried Out by the Intervenor:**

RFG is not a standing public interest organization and does not carry out public programs. It is a project-specific group formed to coordinate the participation of directly affected landowners in proceedings and related processes arising from the St. Thomas Transmission Project. RFG's activities include acting as counsel, coordinating communications among members, reviewing Hydro One Networks Inc.'s application materials and proposed land rights, gathering and organizing relevant landowner information, considering the need for expert or other evidence, participating in procedural steps before the OEB, advancing interrogatories or submissions where appropriate, and seeking appropriate terms or conditions in relation to any authorization to expropriate.

## **Governance Structure:**

RFG is an ad hoc landowner group represented by The Ross Firm Professional Corporation. Counsel will act as the group's representative in the OEB proceeding and will report to the group through written updates, email correspondence, telephone or video conferences, and group meetings as required. For matters that uniquely affect a specific member's property, counsel will take instructions from that member only. For issues relating to the Project as a whole or the group's overall approach in the OEB proceeding, counsel will provide advice and options to the group and seek consensus where possible. If unanimous agreement is not available, group instructions will be determined by a two-thirds vote of the group, calculated on the basis of one vote per legally owned parcel. If a two-thirds vote cannot be obtained, counsel will work with the group to determine an appropriate path forward. Significant decisions may require written confirmation. This structure allows RFG to coordinate common issues efficiently while preserving each member's ability to provide separate instructions on matters that are unique to that member's land or legal interests.

## **Representatives:**

Quinn Ross  
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5195253570

## Cost Claim Filing contact:

Theresa Kluge  
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226-921-4506

## Other Contacts:

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Rochelle Doherty  
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226-963-1303

## 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
NA		

## Issues:

RFG members are materially impacted by this proceeding because Hydro One Networks Inc. seeks authority to expropriate interests in lands in which RFG members have ownership or other legal interests. An order authorizing expropriation would directly affect their property rights, land use, access, farming and other operations, future use of the lands, and the legal burdens registered against or otherwise affecting their properties. RFG understands that this proceeding concerns the proposed expropriation of land interests and not the determination of

compensation. RFG's intervention will therefore focus on issues that are relevant to the OEB's determination of whether expropriation authority should be granted and on what terms. RFG is not aware of a settled issues list at this time. RFG expects its intervention to address the following issues: Whether the proposed expropriation of each affected land interest is in the public interest. Whether Hydro One Networks Inc. has demonstrated that the lands and land rights it seeks are reasonably necessary for the Project. Whether the proposed expropriation is limited to the minimum amount of land reasonably required. Whether the legal interests sought, including any permanent easements, temporary rights, access rights, restrictions, or other rights, are the minimum legal interests reasonably required. Whether the property deions, surveys, plans, and proposed land rights are clear, accurate, and sufficient to allow affected landowners and the OEB to understand the nature and extent of the proposed taking. Whether alternative alignments, refinements, construction methods, access arrangements, or mitigation measures could reduce the impact on affected lands. Whether conditions should be attached to any OEB order, including conditions relating to access, construction protocols, drainage and tile repair, soil compaction, erosion control, biosecurity, restoration, notice to landowners, limits on the exercise of rights, and ongoing communication with affected landowners. Whether the application record provides a sufficient evidentiary basis for the OEB to authorize the requested expropriation rights. To the extent any issues list omits the necessity, scope, minimum land interest, minimum legal interest, or landowner-specific conditions associated with the proposed expropriations, RFG asks that those matters be included as issues that are relevant and material to the proceeding.

## **Policy Interests:**

N/A

## **Hearings:**

RFG does not require an oral hearing at this time and is prepared to participate in a written hearing or electronic hearing, as directed by the OEB. A written process may be efficient if the issues can be addressed through the application record, interrogatories, written evidence where permitted, and written submissions. RFG reserves the right to request an oral or electronic component if material factual disputes arise that require cross-examination or direct questioning, including disputes concerning the necessity or scope of the land rights sought, the accuracy of property deions, the availability of less intrusive alternatives, or the need for specific conditions in any expropriation order.

## **Evidence:**

RFG is unable to confirm at this time whether it will file evidence in the proceeding. The need for evidence will depend on the OEB's procedural order, any issues list, the completeness of Hydro One Networks Inc.'s application materials, the responses to any interrogatories, and whether the record adequately addresses the landowner-specific issues relevant to the proposed expropriations. If evidence is required or permitted, RFG may file limited evidence from affected landowners and, if necessary, expert or technical evidence addressing matters such as the nature and extent of the land rights sought, property-specific impacts, construction and access impacts, agricultural and drainage impacts, route or alignment refinements, mitigation measures, and proposed conditions. Such evidence would be relevant and material

because it would assist the OEB in determining whether the requested expropriation authority is in the public interest, whether the proposed takings are limited to the minimum land and legal interests reasonably required, and what conditions should be attached to any order. RFG expects that any evidence, if required, could be prepared within approximately four to six weeks after the relevant procedural steps, disclosure, and interrogatory responses are complete. RFG is not able to estimate the cost of evidence at this time. If evidence is filed and RFG is granted cost award eligibility, RFG will seek only reasonable costs that are directly and necessarily incurred for participation in the proceeding and that are recoverable under the OEB's Practice Direction on Cost Awards and applicable tariff.

## **Coordination with Other Intervenors:**

RFG is itself a coordinated group intervention by directly affected landowners, which is intended to reduce duplication and avoid multiple separate interventions on overlapping landowner issues. RFG will review the list of intervenors once available and will make reasonable efforts to coordinate with any other intervenors with similar interests. This may include coordinating on procedural matters, avoiding duplicative interrogatories, sharing non-confidential information where appropriate, aligning submissions on common landowner issues, and considering whether any expert or technical evidence can be coordinated. RFG will avoid unnecessary duplication while preserving its ability to advance issues that are specific to its members' lands, the land rights proposed to be taken from them, and any conditions required to address their particular circumstances.

## **Cost Awards:**

Yes. RFG applies for cost award eligibility. RFG submits that it is eligible for an award of costs under section 3.03(c) of the OEB's Practice Direction on Cost Awards because its members are persons and landholding entities with interests in land that are affected by this proceeding. Hydro One Networks Inc. seeks authority to expropriate interests in lands in which RFG members have ownership or other legal interests. RFG also submits that, in considering a group intervention, the individual members would themselves be eligible for cost award eligibility because each has an interest in land affected by the process. The group structure is intended to promote efficiency, reduce duplication, and allow common landowner issues to be advanced in a coordinated manner. RFG is not the applicant. RFG does not participate as an electricity transmitter, distributor, generator, retailer, gas utility, municipality, public body, or other party excluded from cost eligibility. To the extent any member is a landholding or farming entity, its interest in this proceeding arises from its affected land interest and not from participation in the energy sector. RFG intends to participate responsibly, focus its participation on relevant and material issues, comply with OEB directions and procedural requirements, coordinate with similarly interested intervenors where appropriate, and avoid unnecessary duplication. RFG's participation is expected to assist the OEB by providing the perspective of directly affected landowners on the proposed expropriations, the scope of the land rights sought, and any appropriate conditions. RFG will seek only reasonable fees and disbursements that are directly and necessarily incurred for its participation in this proceeding and that are recoverable under the OEB's Practice Direction on Cost Awards and applicable tariff.

## **Language Preference:**

RFG does not intend to participate in the hearing using the French language and does not require the hearing or process to be conducted in French.