

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sched. B, as amended (the “**OEB Act**”);

AND IN THE MATTER OF an application by Hydro One Networks Inc. pursuant to section 92 of the OEB Act for an order or orders granting leave to construct transmission line facilities in the County of Renfrew and passing through three municipalities, specifically the Towns of Petawawa, Laurentian Hills and Deep River;

AND IN THE MATTER OF an application by Hydro One Networks Inc. pursuant to section 97 of the OEB Act for an order granting approval of the forms of land use agreements offered or to be offered to affected landowners.

**HYDRO ONE NETWORKS INC.
ARGUMENT-IN-CHIEF**

September 4, 2026

A. INTRODUCTION

1. On May 13, 2026, Hydro One Networks Inc. ("**Hydro One**") applied to the Ontario Energy Board ("**OEB**") for: (a) leave to construct transmission facilities in the County of Renfrew (the "**Project**"), pursuant to section 92 of the OEB Act; and (b) approval of the forms of land use agreements offered or to be offered to affected landowners. The application was updated on May 15, 2026.
2. The Project consists of a 115 kV single-circuit transmission line between Chalk River CTS and Petawawa Junction. The total length of the Project is approximately 21 km in length, including approximately 18 km on federally owned lands (specifically, CFB Petawawa operated by the Department of National Defence ("**DND**")).
3. The Project will replace an in-situ section of an approximately 29 km portion of an existing Hydro One transmission line ("**Circuit D6**") that has reached end-of-life. This Project will complete work on Circuit D6. The distance of the relocation route it will replace is approximately 21 km.
4. Circuit D6 is the sole transmission supply from Des Joachims TS, serving multiple distribution stations in the Renfrew Region including Des Joachims DS, Deep River DS, Craig DS, Forest Lea DS, and Petawawa DS. Given that Circuit D6 is the only transmission circuit serving existing loads in the region, the IESO has confirmed that the Project is necessary to maintain reliable supply, and is consistent with the regional planning objectives for the Renfrew Region.
5. The need to refurbish Circuit D6 was identified in both the Investment Summary Document SR-19 filed as part of Hydro One's 2020–2022 Transmission Revenue Requirement application (EB-2019-0082) and Hydro One's 2021 Needs Assessment (published in May 2021). Unfortunately, refurbishment of the existing circuit is not possible because of conflicts with active military training operations and associated safety risks. Under the *National Defence Act* (Canada) and the *Defence Controlled Access Area Regulations* (SOR/86-957) made thereunder, DND has strict control over access to the military base. As a result, the portion of Circuit D6 addressed by the Project will not follow the existing

route through the live firing range on the DND military base and will be relocated away from the controlled access area on the CFB Petawawa base.

B. PROCEDURAL BACKGROUND

6. On June 3, 2026, the OEB issued its Notice of Hearing in this proceeding. No intervention requests were received.
7. On July 3, 2026, Hydro One requested that the OEB dispose of the Application without a hearing, pursuant to subsection 21(4) of the OEB Act.
8. On July 28, 2026, the OEB sent three written clarification questions to Hydro One, which were responded to by Hydro One on August 7, 2026. The clarification questions dealt with: (a) the forecast Project cost as compared to previous cost forecasts based on a refurbishment of this segment of Circuit D6; (b) the status of Hydro One's existing easement through the DND military base, and associated access rights; and (c) the access rights that Hydro One would obtain under a new easement arrangement with DND.
9. On August 26, 2026, the OEB issued Procedural Order No. 1, pursuant to which the OEB determined that it would hold a written hearing. Procedural Order No. 1 also set out a schedule for final argument commencing with this Argument-in-Chief. In making its determination, the OEB indicated that a written hearing was necessary "in light of the project's cost, Hydro One's responses to the clarifying questions, and the issuance of a Notice of Hearing."

C. SUBMISSIONS

10. Based on the three reasons for the OEB's determination to hold a written hearing, Hydro One understands the OEB to be most interested in Hydro One's submissions on the Project cost and DND easement rights that were the subject of the OEB's clarification questions. Notwithstanding that, this Argument-in-Chief addresses all issues in the OEB's Issues List in this proceeding.

ISSUE 1.0: Prices: Need for the Project

- 1.1 **Has the applicant demonstrated that the project is needed or would be beneficial in the case of discretionary projects? What factor(s) are driving the need – e.g., new**

customer demand, increase system capacity requirement, reliability, sustainment, system resilience, etc.?

11. Hydro One's evidence (in particular, at Exhibit B, Tab 3, Schedule 1) demonstrates the need for the Project as proposed by Hydro One. This portion of Hydro One's Argument-in-Chief addresses "need" from two perspectives: (a) need for the *replacement* of the 21 km segment of Circuit D6 that comprises the Project; and (b) need for the *relocation* of this portion of Circuit D6.
12. ***Need for Replacement:*** As noted above, Circuit D6 is the sole transmission supply from Des Joachims that serves multiple distribution stations in the Renfrew Region, including Des Joachims DS, Deep River DS, Craig DS, Forest Lea DS, and Petawawa DS. As a result, its continued operation is needed to maintain supply to existing load in this part of the Renfrew Region.¹
13. As part of the regional planning cycle for the Renfrew Region, Hydro One's 2021 Needs Assessment (published in May 2021) identified several issues in the area, including a need to undertake an end-of-life refurbishment of Circuit D6, as well as emerging station capacity needs at Pembroke TS, Forest Lea DS, and Petawawa DS.²
14. Hydro One's subsequent Regional Infrastructure Plan (released in July 2023) also identified the need for the refurbishment of most of Circuit D6.
15. The portions of Circuit D6 outside of the Project have been refurbished. When the remaining 21 km of Circuit D6 is relocated, the reliability need first identified in the 2021 Needs Assessment and subsequently confirmed by the IESO will be complete.
16. ***Need for Relocation:*** The existing segment of Circuit D6 yet to be refurbished includes a segment that crosses through a "controlled access area" on CFB Petawawa within the bounds of the active military base's live firing range.
17. Notwithstanding Hydro One's existing easement arrangement with DND, federal legislation currently takes precedence over Hydro One's current access rights. More

¹ Exhibit B/3/1 (Attachment 1, p.6).

² Exhibit B/3/1 (Attachment 1, p.4).

specifically, section 5 of the *Defence Controlled Access Areas Regulations* (SOR/86-957) made under the *National Defence Act* (Canada) prohibits any person from entering a “controlled access area” without first obtaining a pass.

18. As noted in correspondence from DND included as evidence in this proceeding,³ there are periods of time (four to five days in duration) when DND will not grant Hydro One access to Circuit D6 due to live-fire training at CFB Petawawa. While planned maintenance activities on the segment of D6 that is the subject of this Application might be possible (i.e., Hydro One could endeavour to coordinate planned maintenance activities with DND for periods of time when access could be granted), the need for emergency and short-notice access by Hydro One makes the current access arrangement untenable.
19. Hydro One’s response to OEB Clarification Question – 02 provides a very recent example of the importance of unrestricted access to Circuit D6 (or any transmission system asset) in response to emergency situations. In May 2026, an outage on Circuit D6 was caused by a fallen tree outside of CFB Petawawa. After addressing the fallen tree, Hydro One’s standard re-energization protocol required an inspection of the remainder of Circuit D6 (including the portion on CFB Petawawa). Hydro One’s initial request to access the area was denied by DND, which led to: (a) a postponement in re-energization of Circuit D6; and (b) considerable negotiations with DND to provide a temporary, limited window of access to carry out the inspection. During the inspection, Hydro One identified a second fallen tree in contact with Circuit D6 on CFB Petawawa. Had the negotiated temporary access window not been granted, Circuit D6 might have been energized with an undetected hazard present, creating a risk of a subsequent outage, potential brush fire and additional damage to Hydro One’s transmission system.
20. Access impediments such as this are unacceptable, thus an in-situ refurbishment is not an option. As a result, Hydro One has worked with DND to come up with alternate routing on DND lands but outside a controlled access area (i.e., not subject to the restrictions in the *Defence Controlled Access Area Regulations*). Hydro One is of the view that this

³ Exhibit B/3/1 (Attachment 2).

relocation is needed, and represents the most practical and efficient method for addressing the current access restrictions.

21. In addition to the need for short-notice and emergency access, the access constraints that exist by virtue of federal regulation make any in-situ refurbishment of the segment of Circuit D6 still remaining essentially impossible due to the amount of continuous time of unrestricted access to the current right-of-way that Hydro One would require.

1.2 Is the project consistent with any relevant power system plan (e.g., regional plan)?

22. As noted in the *Supplement Evidence to Support the Need for the 115 kV D6 Transmission Line Relocation Project* (March 2026), the IESO is supportive of the Project because “it is consistent with regional planning objectives for the Renfrew Region and necessary to maintain reliable supply on the only transmission circuit serving these loads.”⁴

ISSUE 2.0: Prices: Project Alternatives

2.1 Has the applicant demonstrated that the proposed project is the preferred option to address the need, as opposed to implementing a different transmission solution, a distribution solution, a non-wires solution, or some other solution?

23. The proposed Project is required to replace the balance of Circuit D6 that has reached end-of-life in the Renfrew Region. As noted above, refurbishment of the majority of the Circuit D6, in areas outside of CFB Petawawa base, has already been completed, but in-situ refurbishment of the remaining approximately 29 km segment of Circuit D6 within CFB Petawawa is not an option. As a result, the only practical alternatives considered by Hydro One in connection with the Project were: (a) alternative conductor sizes; and (b) alternative routing.
24. **Alternative Conductor Sizes:** Exhibit B, Tab 5, Schedule 1 of the Application summarizes Hydro One’s analysis of alternative conductor sizes. That analysis was guided by two principles: (a) meeting the supply needs in the Renfrew Region and surrounding Pembroke/Des Joachims transmission corridor; and (b) optimizing conductor size and rating based on the expected load scenario in terms of line losses.

⁴ Exhibit B/3/1 (Attachment 1, p.6).

25. Four alternative conductor sizes were evaluated, all of which met the supply needs. As a result, the focus of the alternative analysis in this proceeding has been on a screening analysis based on Hydro One's Line Loss Guideline.⁵ The screening analysis showed a similar Total Annual Cost for the four alternatives considered by Hydro One (ranging from \$3.18 million to \$3.24 million).⁶
26. As a result, a 50-year net present value ("**NPV**") analysis was carried out to determine which conductor size provided the best NPV result. That analysis was carried out using a fixed capacity price and varying energy price values. As demonstrated at Table 2 of Exhibit B, Tab 5, Schedule 1, Alternative #1 (411.4 kcmil ACSR/TW conductor) was the most economically efficient alternative. This is Hydro One's preferred alternative for the Project.
27. **Alternative Routing:** The defined route for the Project was determined in accordance with the *Class Environmental Assessment for Transmission Facilities* (2024) undertaken in accordance with the *Environmental Assessment Act* (Ontario) (the "**Class EA**"). A Draft Environmental Study Report ("**ESR**") was made available for public review in February 2026, and the final ESR and Statement of Completion will be filed with the Ontario Ministry of Environment, Conservation and Parks by September 16, 2026.

ISSUE 3.0: Prices: Project Cost

- 3.1 **Has the applicant provided sufficient information to demonstrate that the estimates of the project cost are reasonable? Are comparable projects selected by the applicant (as required by the filing requirements) sufficient and appropriate proxies for the proposed project?**
28. Yes, Hydro One has provided sufficient information to demonstrate that the estimated total capital cost of the Project (\$37.1 million) is reasonable.
29. **Cost Estimate Methodology:** The Project cost estimate was developed using a multi-faceted approach involving internal cost estimate tools and techniques, and a risk management model for the contingency allowance. The estimate is based on a Project definition equivalent to a Class 3 estimate under the Association for the Advancement of

⁵ As noted at Exhibit B/5/1, p.1, fn.1, this document was filed in EB-2023-0197 at Exhibit I/2/1 (Attachment 1).

⁶ Exhibit B/5/1, p.2, Table 1.

Cost Engineering International estimate classification system, which carries an estimate range of -20%/+30%. A detailed breakdown of capital costs is provided in Table 1 of Exhibit B, Tab 7, Schedule 1, including Materials (\$8,483K), Labour (\$10,976K), Equipment Rental & Contractor Costs (\$8,468K), Sundry (\$1,033K), Contingencies (\$2,927K), Overhead (\$2,522K), Allowance for Funds Used During Construction (\$1,416K), and Real Estate (\$1,309K). An additional \$3.1 million of Operations, Maintenance and Administration removal costs are associated with completing the Project.

30. **Conductor Selection:** As noted above, Hydro One conducted an analysis of four conductor size alternatives to select the most cost-effective option that would: (a) meet the supply needs in the Renfrew region and surrounding Pembroke/Des Joachims transmission corridor; and (b) be the optimal conductor size and rating, based on the expected load scenario in terms of line losses. The conductor alternatives evaluated included: (i) Alternative #1 – 411.4 kcmil ACSR/TW conductor; (ii) Alternative #2 – 477.0 kcmil ACSR conductor; (iii) Alternative #3 – 732.0 kcmil ACSR/TW conductor; and (iv) Alternative #4 – 997.2 kcmil ACSR/TW conductor. As part of this analysis, and as shown in Table 1 of Exhibit B, Tab 5, Schedule 1, Hydro One performed a screening analysis of all four alternatives, which resulted in a change in the alternative ranking, to the proposed conductor in the Application. Hydro One also performed a detailed 50-year NPV sensitivity analysis of all four alternatives, as show in Table 2 of Exhibit B, Tab 5, Schedule 1, using a 5.65% discount rate, to evaluate which conductor alternative provided the best result. The NPV analysis demonstrates that Alternative #1 (411.4 kcmil ACSR/TW conductor) is the most economically efficient alternative while meeting the area's capacity needs.
31. **Comparable Projects:** Hydro One selected three comparable 115 kV projects as cost benchmarks (as described in Section 2.0 of Exhibit B/7/1), including: (i) the K4 Transmission Line Refurbishment Project (10.0 km refurbishment between Kirkland Lake TS and Matachewan JCT, in-service 2024); (ii) the X2Y Transmission Line Refurbishment Project (7.6 km refurbishment between Magellan Aerospace CTS and IPB Bryson JCT, in-service 2020); and (iii) the D6 Transmission Line Refurbishment Project (48 km in-situ sustainment between Des Joachims TS and Petawawa/Craig DS, in-service 2022).

32. Hydro One acknowledges that it has completed a relatively limited number of 115 kV greenfield transmission line projects recently, which limits the availability of directly comparable baseline projects. Accordingly, the selected comparators are refurbishment projects that include the installation of new structures and conductors and only in some cases, construction along a new right-of-way. These projects were selected as reasonable comparators as they share the following key characteristics: all involve 115 kV single-circuit transmission lines, utilize composite pole structures, and are located in predominantly rural environments, making them appropriate benchmarks for comparing unit line costs despite differences in overall project scope.
33. To ensure a reasonable comparison of underlying line unit costs across all projects, Hydro One made adjustments to exclude project-specific, non-comparable cost elements driven by scope differences, including real estate, structure type variations (composite and steel), forestry clearing, conductor size, project execution needs and in-service date to bring all costs to 2028 dollars using OEB-approved inflation parameters. On an adjusted basis, the Project's unit line cost of \$879K/km is consistent with the comparable projects: K4 at \$1,160K/km, X2Y at \$864K/km, and D6 (Historical) at \$876K/km.
34. Hydro One respectfully submits that the comparable projects are sufficient and appropriate proxies, thereby demonstrating the reasonableness of cost.
- 3.2 Has the applicant adequately identified and described any risks associated with the proposed project? Is the proposed contingency budget appropriate and consistent with these identified risks?**
35. Yes, Hydro One has adequately identified and described the risks associated with the Project and has proposed a contingency budget that is appropriate and consistent with those risks.
36. **Identified Risks:** Hydro One follows an industry-established best practices methodology in developing the contingency utilizing a risk management model that includes both a qualitative and a quantitative risk analysis of identified risks to the Project. Hydro One has

identified the following Project risks that predominantly contribute to the total contingency for the Project:⁷

- (a) *Permits, Approvals and Authorizations:* Risk of delays or cost escalation in securing any required approvals, including but not limited to leave to construct, necessary land rights, highway and rail crossing permits, and environmental approvals.
 - (b) *Procurement:* Risk to material lead times or material price increases that may cause schedule disruptions and increased cost.
 - (c) *Subsurface Conditions:* Risk of unforeseen underground obstructions or environmental conditions requiring additional mitigations that will have a cost impact and could delay the Project progress.
 - (d) *Outage Constraints:* Risk of limited availability of required system outages during summer and winter peak demand periods, which may restrict cutover and commissioning activities, increase scheduling complexity, and potentially delay overall Project progress.
37. ***Mitigation Measures:*** Hydro One has implemented the following measures to mitigate the above risks:
- (a) Established early and continuous engagement with all impacted stakeholders and secured all land rights voluntarily.
 - (b) Proactively submitted all regulatory applications, permits, and authorizations sufficiently in advance of construction start.
 - (c) Initiated procurement of long-lead materials (steel structures, conductor, OPGW) in advance and established continuous communication with the material vendor.

⁷ Section 1.0 of Exhibit B/7/1.

- (d) Conducted preliminary studies and testing (e.g., boreholes and soil sampling) to identify subsurface conditions and develop implementation plans to address any risks encountered during construction.
 - (e) Factored outage planning into the planning and scheduling phase to ensure critical outage-dependent activities are appropriately considered.
38. **Contingency Budget:** The proposed contingency budget is \$2,927K, as set out in Table 1 of Exhibit B, Tab 7, Schedule 1.
39. Certain risks have been excluded from the total contingency due to the unlikelihood or uncertainty of occurrence, including labour disputes, safety or environmental incidents, significant changes in costs and/or availability of materials outside the control of Hydro One, and any other unforeseen and potentially significant events. This exclusion is reasonable, as these are extraordinary risks that are generally outside the scope of project-level contingency planning.
- 3.3 If the applicant has requested that deferral accounts be established, has the applicant adequately demonstrated that the eligibility criteria of Causation, Materiality, and Prudence have been met?**
40. This question is not applicable. There are no new deferral or variance account requests being made as part of the Application.⁸

ISSUE 4.0: Prices: Customer Impacts

- 4.1 Has the applicant correctly determined the need for and the amount of any capital contributions that are required for the project?**
41. Yes, Hydro One has correctly determined that no customer capital contribution is required for this Project.
42. The Project is classified as a sustainment project based on the identified need to refurbish existing assets given their age and poor condition and to maintain system capacity, reliability, and quality of electricity. The Project's costs will be included in the line

⁸ Exhibit B/10/1.

connection pool for cost classification and recovery purposes and are not allocated to any individual customer.

43. In support of this determination, Hydro One conducted a 25-year discounted cash flow analysis of the line connection pool. This analysis demonstrates that based on the estimated initial total Project cost of \$40.2 million (comprising \$37.1 million of upfront capital costs plus \$3.1 million of removal costs), plus the assumed impact on the future capital cost allowance, Hydro One's corporate income tax, and zero annual incremental line connection revenue utilizing the 2026 UTR over a 25-year evaluation period, the Project will have a negative net present value of \$34.9 million.⁹
44. This determination is consistent with the OEB-approved cost allocation methodology from Hydro One's most recent transmission rate filing, under which the line assets are allocated 100% to the Line Connection Pool.
- 4.2 Are the projected transmission rate impacts that will result from the project reasonable given the need(s) it satisfies and the benefit(s) it provides?**
45. Yes, the projected transmission rate impacts are minimal and reasonable in light of the demonstrated need for and benefits of the Project.
46. **Rate Impact Analysis:** The analysis of the line connection pool rate impact was carried out based on Hydro One's 2026 transmission revenue requirement and the 2026 approved Ontario Uniform Transmission Rates (as described in Exhibit B, Tab 9, Schedule 1). The 2026 OEB-approved rate of \$1.03 per kW/month increases to \$1.04 per kW/month over a 25-year time horizon, representing a 0.97% rate impact relative to the base year.
47. **Impact on Typical Residential Customer:** Adding the costs of the required facilities to the line connection pool will result in a \$0.02 per month (or 0.01%) increase on a typical residential customer's bill under the Regulated Price Plan. This translates to approximately \$0.20 per year. The impact falls exclusively on the Line Connection Pool share of the transmission component; there is no impact on the Transformation Connection Pool or Network Connection Pool provincial uniform rates.

⁹ Exhibit B/9/1, Tables 2 and 3.

48. ***Need and Benefits:*** The Project provides the necessary renewal and relocation of a segment of Circuit D6 that has reached end-of-life. As noted above, Circuit D6 is the only 115 kV transmission supply line to the Des Joachims subsystem, servicing Craig DS, Deep River DS, Forest Lea DS, and Petawawa DS, making continued service along this corridor essential for maintaining supply to existing loads. The Project will also enhance the reliability, safety, and operational accessibility of the relocated segment of Circuit D6, as well as resolve very real access constraints posed by the DND military base. In light of this need and these benefits, a \$0.02/month (or 0.01%) increase on a typical residential bill is reasonable. Overall, the Project is not expected to have a material impact on Uniform Transmission Rates or the overall average Ontario consumer's electricity bill.

ISSUE 5.0: Reliability and Quality of Electricity Service

5.1 Has the applicant established that the project will maintain or improve reliability?

49. Yes, Hydro One has established that the Project will maintain and improve the reliability of the transmission system in the Renfrew Region.
50. Circuit D6 was built in the 1940s and this segment has not undergone any major refurbishment since. The segment of Circuit D6 addressed by the Project has been confirmed through condition assessment verification to have reached end of life.
51. The Project will return the Circuit D6 to "as-new" condition, increasing the line's reliability and safety in the local area. The relocation will enhance overall accessibility, safety, and minimize system reliability risk within the Project area by reducing constraints on both utility operations and military activities. The investment is intended to mitigate safety and reliability risks associated with operating deteriorated assets, including unplanned outages.
52. The IESO has provided Supplemental Evidence confirming that it supports the Project as it is consistent with regional planning objectives for the Renfrew Region and necessary to maintain reliable supply on the only transmission circuit serving these loads. The IESO also confirmed that it is not aware of, and has not identified, any additional system needs or additional load supply requirements in the area that might impact the Project. Further,

the Project is consistent with the recommendations made by the IESO in the Renfrew Regional IRRP.¹⁰

53. The renewed assets can be expected to improve the quality of service and reliability of the circuit, as described in the Application.

5.2 Has the applicant provided a final System Impact Assessment (SIA)? Does the final SIA conclude that the project will not have a material adverse impact on the reliability of the integrated power system?

54. Yes, Hydro One has provided a Final SIA, prepared by the IESO, at Exhibit F, Tab 1, Schedule 1, Attachment 1 (SIA reference # CAA 2026-EX1314, dated April 24, 2026).

55. The Final SIA concludes that the Project is expected to have no material adverse impact on the reliability of the integrated power system and recommends that a Notification of Conditional Approval for Connection be issued.

56. Please note that the SIA report appendices containing confidential information (Appendices B and C) have been omitted from the public filing, consistent with the OEB's Chapter 4 Filing Requirements, on the basis that disclosure could reasonably be expected to pose a potential security threat to the integrated power system.

5.3 Has the applicant provided a final Customer Impact Assessment (CIA)? Does the final CIA conclude that the project will not have an adverse impact on customers, with respect to reliability and quality of electricity service?

57. Yes, Hydro One has provided a Final CIA at Exhibit G, Tab 1, Schedule 1, Attachment 1.

58. The Final CIA concludes that there is no material impact expected on the connection of existing customers to the transmission system due to the Project. Additionally, the Final CIA concludes that the Project, as per the SIA, will not have any adverse impact on the IESO-controlled grid when all recommendations in the SIA, if any, are implemented.

59. Further, as stated in the Application, no directly connected customers are adversely affected by the Project. The Project concords with the commitments undertaken through the Class EA process.

¹⁰ Exhibit H/1/1 (Attachment 1).

ISSUE 6.0: Economic Growth

6.1 Where the applicant claims that a proposed project will support economic growth in a manner consistent with the policies of the Government of Ontario, has the applicant substantiated this claim?

60. The Project will support economic growth in Ontario in a manner that is consistent with the province's economic and electricity policy in at least two ways:
61. First, as outlined in Exhibit B, Tab 3, Schedule 1, the Project addresses a regional need for reliable supply to existing loads served by Des Joachims DS, Deep River DS, Craig DS, Forest Lea DS, and Petawawa DS. The Project flows from a 2021 Hydro One Needs Assessment, and subsequent IESO Scoping Assessment that recommended the end-of-life refurbishment of Circuit D6 and other capacity-related needs in the Renfrew Region.¹¹ By addressing the deteriorated state of Circuit D6, and ensuring unfettered access to the segment of Circuit D6 on DND lands, the Project ensures reliable supply to the Renfrew Region. Enhanced reliability reduces the risk of supply interruptions that result in significant costs for businesses and residents, and enables the efficient use of existing assets to support future economic growth in the Renfrew Region. This is precisely aligned with section 1(1)2.1 of the OEB Act.
62. Second, the Project aligns with Ontario's key policy document related to the electricity sector – i.e., Ontario's Integrated Energy Plan, which emphasizes the importance of taking action to ensure that demand growth in eastern Ontario is not constrained by transmission capacity. Adequate and reliable electricity supply is necessary for economic growth and the changing needs of Ontario's economy. Businesses and residential developments require an electricity system with the capacity to serve them. The Project directly supports the Government of Ontario's policy objective of enabling economic growth through infrastructure investment.
63. In summary, the Project supports economic growth by ensuring that the electricity transmission system has adequate capacity and reliability to accommodate ongoing and

¹¹ Exhibit B/3/1 (Attachment 1, p.4).

future development in the Renfrew Region, consistent with the objectives of the OEB Act and the policies of the Government of Ontario.

ISSUE 7.0: Route Map and Form of Landowner Agreements

7.1 **Are any proposed forms of landowner agreements under section 97 of the OEB Act appropriate and consistent with the OEB requirements?**

64. The Project consists of a single circuit 115 kV transmission line that is approximately 21 km in length, the majority of which will be sited within a corridor that is approximately 30 metres in width.¹²

65. The Project requires Hydro One to acquire land rights from 35 directly impacted properties, as follows:¹³

Land Ownership Type	Number of Properties	Area	Proportion of Route
Private Lands	5	8 ha	13.5%
Federal Lands	16	50 ha	84.3%
Provincial Lands	4	0.7 ha	1.2%
Municipal Lands	10	0.6 ha	1.0%

66. **Privately-Held Land Rights:** Hydro One currently holds 100% of the privately held land rights required along the route, as noted in the table at Exhibit E, Tab 1, Schedule 1, Attachment 3.

67. Hydro One submits that the five forms of landowner agreements included in the Application, and for which it is seeking OEB approval pursuant to section 97 of the OEB Act, are appropriate and consistent with OEB requirements.¹⁴

¹² Exhibit E/1/1, p.1.

¹³ Exhibit E/1/1, p.1.

¹⁴ Pro forma copies of the forms of agreements are included at Exhibit E/1/1 (Attachments 4 through 8 inclusive).

68. These five landowner agreements were previously approved by the OEB in EB-2023-0198, and no substantive changes have been made to the forms of these agreements.¹⁵
69. Hydro One has made independent legal advice (“**ILA**”) available to all impacted private property owners. ILA being afforded to all impacted property owners is a principle found in Hydro One’s Land Acquisition Compensation Principles (“**LACP**”).¹⁶ The intent of the LACP is to ensure common or uniform practices are followed in the way compensation for necessary land rights is determined and offered to landowners. This includes commitments to appraise land using third party Accredited Appraiser Canadian Institute (“**AACI**”) qualified appraisers; landowner choice between granting an easement or fee simple sale of property interests; incentive payment offers; availability of independent legal advice to review settlement offers; all of which is intended to improve landowner relations and avoid the cost of more contentious expropriation processes.
70. **Federal Land Rights:** The portion of the Project that crosses DND lands is effectively a greenfield project on a new right-of-way, most of which is geographically located along Highway 17. Hydro One’s existing easement agreement with DND will remain in place until the existing portion of Circuit D6 on DND lands is decommissioned. The new easement agreement is currently being negotiated with DND.
71. Given the unique nature of the lands and DND’s authority over the lands, the sophistication of DND as a contractual counterparty, and the fact that the OEB’s expropriation powers do not apply to CFB Petawawa, the form of easement agreement ultimately entered into with DND will not be in the form of landowner agreements typically used by Hydro One with private landowners.
72. As noted above, the new route through DND lands will be located outside of a controlled access area (as defined in the *Defence Controlled Access Area Regulations*), and was determined based on the Class EA process.
- 7.2 Does the route map provided pursuant to section 94 of the OEB Act show the general location of the proposed project and the municipalities, highways, railways,**

¹⁵ Exhibit E/1/1, p.5.

¹⁶ Exhibit E/1/1 (Attachment 1).

utility lines and navigable waters through, under, over, upon or across which the proposed project is to pass?

- 73. Exhibit B, Tab 2, Schedule 1, Attachment 1, provides a general “Notice Map”, which depicts the entire Project route relative to: the existing transmission line, road and railway infrastructure, water bodies and municipalities.
- 74. The nine detailed route maps at Exhibit E. Tab 1, Schedule 1, Attachment 2, depict navigable waters and other environmental constraints and features.
- 75. Collectively, the Notice Map and nine detailed route maps satisfy the requirements of section 94 of the OEB Act and have been utilized by the OEB to effect notice with respect to this proceeding.

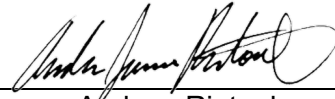
ISSUE 8.0: Conditions of Approval

- 8.1 The OEB’s standard conditions of approval are attached as Schedule 1 to Procedural Order No. 1. If the OEB approves the proposed project, what additional or revised conditions, if any, are appropriate?**
- 76. Hydro One has no proposed additions or revisions to the OEB’s standard conditions of approval as set out in Schedule 1 to Procedural Order No. 1.

D. CONCLUSION

- 77. Based on the foregoing, Hydro One respectfully submits that the relief sought in this Application should be granted.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 4th day of September, 2026.



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