

**ONTARIO ENERGY BOARD**

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

**AND IN THE MATTER OF** section 99 (1) of the *OEB Act*

**AND IN THE MATTER OF** an Application by Hydro One Networks Inc.  
 (“Hydro One”) for authority to expropriate land for the purpose of  
 constructing and operating a 230-kilovolt double-circuit transmission  
 line between the City of London, Ontario and the City of St. Thomas,  
 Ontario.

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**APPLICATION FOR AUTHORITY TO EXPROPRIATE LAND INTERESTS**

**HYDRO ONE NETWORKS INC.**

**March 4, 2026**

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1 **A. INTRODUCTION**

2  
3 1. Hydro One hereby applies to the Ontario Energy Board (“OEB” or “Board”) pursuant  
4 to section 99(1) of the *OEB Act* for authority to expropriate certain interests in the  
5 lands (jointly referred to as the “Subject Lands”) as more particularly described and  
6 shown in the plans and descriptions attached hereto.

7  
8 2. Hydro One requires expropriation authorization so that it may construct and operate  
9 a new 230-kilovolt (“kV”) double-circuit transmission line known as the St. Thomas  
10 Transmission Line Project (the “Project”). The Project is located between the City of  
11 London, Ontario and the City of St. Thomas, Ontario.

12  
13 3. The Project will transmit electricity to PowerCo Canada Inc.’s (“PowerCo”) electric  
14 vehicle (“EV”) battery cell manufacturing facility in the City of St. Thomas, which is  
15 anticipated to become Canada's largest EV battery plant. The Project is needed to  
16 meet the forecasted electricity demands of the facility.

17  
18 4. Hydro One is exempt from having to obtain leave to construct for the proposed  
19 transmission line under section 92 of the *OEB Act* by virtue of subsection 6.2(1)(e.1)  
20 of Ontario Regulation 161/99 (“Exemption Regulation”).<sup>1</sup> The Project is being  
21 undertaken pursuant to the terms of a Connection and Cost Recovery Agreement  
22 made between Hydro One and its customer, PowerCo, that specifies that the cost of  
23 the Project is to be exclusively paid for by PowerCo who is not a licensed transmitter  
24 or distributor. The Project therefore qualifies for the exemption set out in the above  
25 noted provision of the Exemption Regulation.

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<sup>1</sup> Subsection 6.2(1)(e.1) of O.Reg. 161/99 provides that subsection 92(1) of the *OEB Act* does not apply to a person that constructs, expands or reinforces an electricity transmission line, if (i) the construction, expansion or reinforcement of the line is undertaken pursuant to an agreement between the person and one or more customers that specifies that the cost of the construction, expansion or reinforcement is to be exclusively paid for by the customer or customers, and (ii) none of the customers is a licenced transmitter or licenced distributor.

1 **B. NATURE OF THE PROJECT**

2  
3 5. In the spring of 2023, the provincial and federal governments secured an investment  
4 from the Volkswagen Group and its subsidiary, PowerCo, to build an EV battery cell  
5 manufacturing facility in the City of St. Thomas, Ontario.<sup>2</sup>

6  
7 6. In a letter dated August 31, 2023, the Government of Ontario urged Hydro One to  
8 make the Project a priority and to undertake the necessary activities to deliver the  
9 Project on an expedited basis, consistent with the Government of Ontario's  
10 commitment to the timely grid connection of the St. Thomas EV battery cell  
11 manufacturing facility. A copy of the letter is provided at Appendix 1 of this Application.

12  
13 7. Hydro One is obligated to ensure that all customers are granted non-discriminatory  
14 access to its transmission system, pursuant to Section 26 of the *Electricity Act, 1998*  
15 and in accordance with the terms and conditions set out in Hydro One's transmission  
16 license<sup>3</sup>, the OEB's Transmission System Code, and Hydro One's OEB-approved  
17 Transmission Connection Procedures.

18  
19 8. At PowerCo's request, Hydro One prepared a connection cost estimate and the  
20 parties subsequently concluded a Connection and Cost Recovery Agreement dated  
21 August 28, 2024. A copy of the Agreement is provided at Appendix 2 of this  
22 Application. Due to sensitive commercial information in the Agreement and the  
23 restrictions on disclosing customer information under Section 14 of Hydro One's  
24 transmission license, the Agreement has been filed in confidence pursuant to Rule  
25 10 of the OEB's Rules of Practice and Procedure.

26  
27 9. To meet the forecast electricity demands of this manufacturing facility, a new 230 kV  
28 double-circuit transmission line is required. It will extend from Hydro One's existing  
29 230 kV transmission corridor north of Highway 401 in the City of London, Ontario and

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<sup>2</sup> Ontario Government News Release from Office of Premier, dated April 21, 2023: [Volkswagen's New Electric Vehicle Battery Plant Will Create Thousands of New Jobs | Ontario Newsroom](#).

<sup>3</sup> Hydro One's Licence [ET-2003-0035](#), issued October 31, 2023.

1 span approximately 18 kilometers south to the new Centennial Transformer Station  
2 in the City of St. Thomas, Ontario.

3

4 10. The route for the transmission line was identified and approved through the  
5 environmental assessment process in accordance with the *Environmental*  
6 *Assessment Act*. On October 28, 2025, Hydro One filed the Statement of Completion,  
7 including the Final Environmental Study Report<sup>4</sup>, with the Ministry of the Environment,  
8 Conservation and Parks. This process was open to participation by the public,  
9 including the landowners affected by the Project.

10

11 11. On October 28, 2025, the Ontario government announced that construction work  
12 related to the laying of foundations for PowerCo's EV manufacturing facility was  
13 underway.<sup>5</sup>

14

### 15 **C. PROJECT LAND REQUIREMENTS**

16

17 12. The Project requires Hydro One to acquire land rights from 33 directly impacted  
18 properties along the route, including 26 privately held properties, 6 municipally held  
19 properties, and 1 railway crossing. A map illustrating the Project route is included in  
20 Appendix 3 of this Application. A more detailed aerial route map illustrating where the  
21 Subject Lands are located along the Project route is attached at Appendix 4 of the  
22 Application.

23

24 13. Hydro One seeks authority to expropriate new permanent easement rights from  
25 affected properties along the route, which are primarily across agricultural lands, to  
26 facilitate construction and ongoing operation of the Project. To accommodate the  
27 overhead transmission line and supporting structures, easements will be 46 metres  
28 in width. The 46-metre-wide permanent easements are consistent with easements

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<sup>4</sup> St. Thomas Line Project Class Environmental Assessment, [Final ESR](#), dated October 24, 2025.

<sup>5</sup> Ontario Government News Release from Office of Premier, dated October 28, 2025: [Ontario Celebrates PowerCo Construction Milestone in St. Thomas.](#)

1 that Hydro One secures to facilitate similar 230 kV transmission line projects,  
2 including projects that have obtained leave to construct by the OEB.<sup>6</sup>

3  
4 14. The authority to expropriate sought in this Application is intended to provide Hydro  
5 One with similar (if not identical) land interests that Hydro One has required across  
6 other parts of the Project and that have been acquired through voluntary agreements,  
7 discussed below.

8  
9 15. Temporary access rights will also be required during the period of construction for off-  
10 corridor access and construction activities. Hydro One notes that off-corridor  
11 temporary access land rights continue to be negotiated and secured on a voluntary  
12 basis as needed. Should there be any further need to secure authority in the future  
13 to secure off-corridor land rights, Hydro One intends to make a separate application.

14  
15 16. A description of the lands and the specific interests in lands in which Hydro One is  
16 seeking authority to expropriate is attached as Appendix 5. This list is inclusive of all  
17 remaining permanent easement interests Hydro One requires to access, construct,  
18 operate and maintain the Project.

19  
20 17. Hydro One has conducted a search of title sufficient to identify the current registered  
21 landowners, those who hold registrable interests in the lands, and those with any  
22 interest in the lands directly affected by this Application. The names of these  
23 individuals are listed, by property, in Appendix 5. Personal information has been  
24 redacted in accordance with the OEB's Practice Direction.

25  
26 18. Attached hereto as Appendix 6 are copies of the draft reference plans, suitable for  
27 registration, showing the lands over which authority to expropriate the interests set  
28 out in Appendix 5 is being requested and the registered owners thereof.

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<sup>6</sup> EB-2023-0198

1 **D. LANDOWNER CONSULTATION AND VOLUNTARY AGREEMENT EFFORTS**

2  
3 19. Beginning in October 2024, Hydro One notified all directly affected landowners  
4 impacted by the Project of Hydro One's intention to present offers to voluntarily  
5 acquire land interests required for the Project. All voluntary offers presented to  
6 landowners were consistent with Hydro One's St. Thomas Transmission Line Project  
7 Land Acquisition Compensation Principles ("LACP"), a copy of which is attached as  
8 Appendix 7. The LACP is founded upon Hydro One's experience in land acquisition  
9 matters for new transmission projects, and acts as a roadmap for affected landowners  
10 to understand Hydro One's acquisition process.

11  
12 20. The voluntary offers provide financial incentives and choices to landowners in  
13 exchange for early and voluntary acquisition and resolution of land requirements  
14 necessary for the Project. The expropriation authorization relief sought in this  
15 Application intends to maintain consistent terms and conditions irrespective of how  
16 lands are acquired, either via voluntary agreements or expropriation authorization.  
17 Hydro One will abide by the terms of any land acquisition arrangement for the  
18 commencement of construction and as such there is no reason to create differences  
19 between the interests acquired voluntarily versus by way of expropriation  
20 authorization.

21  
22 21. To support and facilitate timely resolution of negotiations and fair settlements with  
23 landowners, Hydro One consistently applied the principles in the LACP, including  
24 determining the calculated Fair Market Value for each property, as determined by  
25 accredited independent appraisers<sup>7</sup> who prepared site-specific appraisal reports.

26  
27 22. Hydro One confirms that each landowner affected in this Application was offered the  
28 standard form of agreement, which is substantively consistent with the form of  
29 agreements previously approved by the Board in other proceedings.<sup>8</sup>

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<sup>7</sup> All appraisers retained by Hydro One have received an Accredited Appraiser Canadian Institute designation from the Appraisal Institute of Canada.

<sup>8</sup> EB-2024-0155

1 23. Hydro One's dedicated real estate representatives continue to engage with  
2 landowners or their legal counsel regarding the Project. Communication between  
3 Hydro One and landowners has been ongoing in an effort to voluntarily obtain the  
4 land interests required for the Project.

5  
6 24. As of March 23, 2026, landowners of 19 of the privately held properties have signed  
7 voluntary agreements for permanent easements for the Project. Discussions are  
8 continuing with the landowners of the 7 remaining privately held properties. The  
9 properties outside of the privately held properties are owned by the Canadian Pacific  
10 Railway Company and the Corporation of the City of St. Thomas, and authority to  
11 expropriate interests in those lands is not being sought in this Application.

12  
13 25. Hydro One confirms all owners and holders of registrable interests in the properties  
14 affected by this Application as listed in Appendix 5, have been formally notified of  
15 Hydro One's intention to proceed with expropriation of certain interests and seek the  
16 relief now requested in this Application.

17  
18 26. As noted above, efforts to voluntarily secure permanent easement interests are  
19 ongoing with all registered landowners listed in Appendix 5 and Appendix 6. These  
20 appendices will be updated over the course of this proceeding if more voluntary  
21 agreements are achieved.

22  
23 **E. PUBLIC INTEREST**

24  
25 27. The expropriation authority requested herein is required for Hydro One to complete  
26 the safe and timely construction of the Project to provide PowerCo with non-  
27 discriminatory access to its transmission system in accordance with Hydro One's  
28 transmission licence, while maintaining a safe, reliable and adequate supply of  
29 electricity in the Province.

30  
31 28. Hydro One has taken reasonable steps to minimize the impact of the proposed  
32 expropriations on the landowners affected by the Project by requesting property

1 interests that are no larger and no more extensive than necessary. The limited-right  
2 easement request is the minimum quantity of lands rights based on an industry-typical  
3 design for a 230 kV transmission line and compliance with industry standards. Hydro  
4 One supports agriculture as a compatible use within its transmission corridors, and  
5 therefore except for the immediate footprint of the transmission towers, the Subject  
6 Lands would continue to support existing farming operations.<sup>9</sup>

7

8 29. Furthermore, the Project supports the Ontario government's investment to grow the  
9 EV industry and supports future economic growth consistent with the statutory  
10 objectives outlined in Section 1 of the *Electricity Act, 1998* and Section 1(1)2.1 of the  
11 *OEB Act*.

12

13 30. The aim of Hydro One remains to provide customers connecting in Ontario the  
14 reliability and quality of service benefits the Project delivers in the most cost-effective  
15 manner possible. The cost of the Project will be exclusively funded by the connecting  
16 customer, in accordance with the Transmission System Code's customer connection  
17 cost responsibility principles. Therefore, the Project will result in no harm to  
18 ratepayers.

19

20 31. Despite Hydro One's ongoing efforts to reach voluntary settlements with all directly  
21 affected landowners, with PowerCo's EV battery cell manufacturing facility's initial  
22 production to begin in 2027, Hydro One is required to proceed with this Application in  
23 order to secure the land rights necessary to complete the Project in a timely manner.

24

25 32. In light of the foregoing, the land rights sought herein are an integral part of the  
26 completion of the Project and therefore are necessary and in the public interest.

27

28 33. As previously mentioned, Hydro One has engaged in good faith discussions with all  
29 landowners affected by the Project, providing consistent settlement offers based on

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<sup>9</sup> St. Thomas Line Project Class Environmental Assessment, Final ESR – Table 7-1, dated October 24, 2025, page 7-316.

1 the Project's LACP. The landowners and interests in lands described in Appendices  
2 5 and 6 reflect that voluntary settlements have not occurred despite these efforts.

3

4 **F. REQUESTED RELIEF**

5

6 34. Based on the foregoing, Hydro One requests:

7 • An Order under section 99 of the *OEB Act* granting the necessary authority to  
8 expropriate the interests in the Subject Lands more particularly described in  
9 Appendix 5 on such terms and conditions as described herein or as may  
10 otherwise be determined by the Board to be in the public interest.

11

12 • Consideration of this matter so that in-service timing of the Project, as per the  
13 customer request, is not unduly delayed. To effectuate that timing, Hydro One  
14 seeks a decision on this Application prior to mid-September 2026. This would  
15 allow the necessary time for filing and registration of the expropriation plans after  
16 receipt of the decision before construction commences on these expropriated  
17 lands.

18

19 35. In parallel with this sought relief, construction activities for the Project will commence  
20 at locations where all necessary approvals, permits, licences, certificates and land  
21 agreements have been obtained.

1 **G. NOTICE**

2  
3 36. Hydro One requests that a copy of all documents filed with the Board be served on  
4 the Applicant and the Applicant's counsel, as follows:

5  
6 **a) The Applicant:**

7 Eryn Mackinnon

8 Regulatory Advisor

9 Hydro One Networks Inc.

10 Mailing Address: 7th Floor, South Tower

11 483 Bay Street

12 Toronto, Ontario M5G 2P5

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15  
16 **b) The Applicant's Counsel:**

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1       **c) The Applicant's Counsel:**

2           Ms. Monica Caceres

3           Assistant General Counsel

4           Hydro One Networks Inc.

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11

12   37. This Application for authority to expropriate certain interests in the Subject Lands as  
13   more particularly described and shown in the plans and descriptions attached hereto  
14   and any other relief the OEB may so deem necessary is respectfully submitted to the  
15   Board on March 4, 2026. The written evidence is prefiled and may be amended from  
16   time to time prior to the Board's final decision on this Application.

**APPENDIX LIST**

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- Appendix 1 – Letter from Ministry of Energy to Hydro One on Enabling Economic Growth and Connecting the St. Thomas EV Battery Facility, dated August 31, 2023
- Appendix 2 – Connection and Cost Recovery Agreement between PowerCo Canada Inc. and Hydro One
- Appendix 3 – St. Thomas Transmission Line General Area Map
- Appendix 4 – St. Thomas Transmission Line Detailed Aerial Project Route Map
- Appendix 5 – Description of Lands and Specific Interests in Lands over which Authority to Expropriate is being Requested
- Appendix 6 – Draft Reference Plans
- Appendix 7 – Hydro One’s Land Acquisition Compensation Principles for the St. Thomas Transmission Line Project