



Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Via Email

Attention: Ms. Kirsten Walli – Board Secretary

July 28, 2015

Dear Ms. Walli:

**Re: EB-2015—216 – Upper Canada Transmission Inc – East-West Tie Line**

As you are aware, we are the lead Municipality for the Members of the Algoma Coalition. We have appeared before the Board on a number of occasions including with respect to the above noted project.

It was only through third-party correspondence that we recently discovered that the Ontario Energy Board had issued an *“Invitation to Comment”* to a select number of entities on a request by Nextbridge / Upper Canada Transmission Inc for the approval of a revised schedule and additional costs related to the development of the East-West Tie Line.

We write to you today to express our sincere concern with respect to the “closed” process that the Board has chosen to seek comment on the above noted subject matter. To that end, please note the following:

1. We refer to a letter dated July 27, 2015 authored by Jay Shepherd of Jay Shepherd Professional Corporation, representing the School Energy Coalition in this matter. In his letter, Mr Shepherd makes a number of references to the governing legislation and the general authority of the Board. As we read through these references it appears to us that the Board has acted contrary to its authority and most certainly contrary to procedural and general fairness to the stakeholders in this process. Generally, ratepayer groups, such as the Algoma



Coalition, represent those who will bear the consequences and results of this process, yet they have been disenfranchised of any opportunity for comment.

2. Unlike many of the other stakeholders, the Algoma Coalition does not hold sufficient resources in reserve that can be used to comment on proposals or applications before the Board. In the past, the proper notification and timing has allowed the Coalition an opportunity to consider participation and obtain the required resources. In this case, the Coalition was not afforded that opportunity.
3. The *Growth Plan for Northern Ontario (the "Plan")* was completed in 2011 and was to set in motion a number of initiatives that would assist in growing the socio-economic infrastructure in Northern Ontario. A key theme in the Plan is the multi-sector and multi-organizational collaboration and consultation that is required to ensure success. Section 1.7 (A Collaborative Approach to Implementation) of the Plan states as follows:

*This Plan provides policy direction for decisions, investments and actions of the Province. It also identifies policy directions that encourage collaboration among other orders of government, as well as non-governmental partners.*

*All ministries of the Ontario government will have a role to play in implementing the policy and investment priorities outlined in this Plan. Implementation will also require collaboration within and between provincial, municipal and federal governments, Aboriginal communities and organizations, Francophone organizations, industry, businesses, labour organizations, community organizations, and education and research institutions. To successfully implement this Plan, these partners will need to work together over the long term.*

*The vision of this Plan is comprehensive and far-reaching, and will take time to achieve. Short-, medium- and long-term actions are required to implement the policies of this Plan. Some actions are underway and can be delivered within shorter time frames, while other matters will require further study and planning, and further dialogue with northerners.*

The recent actions by the Board to invite comment from only a select few is most certainly not in keeping with the Plan. This in fact, is not the first time that the Board has not considered the Plan. Upon the launch of the East-West Tie Line initiative, it was the Algoma Coalition that wrote to the Board on how the process had not considered the Plan, its stakeholders or the theme of consultation... The actual details can be found in our presentation to the Board in May 2013.

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Given the above, the Algoma Coalition supports the request of the School Energy Coalition that the Board issue a letter of direction requiring Nextbridge / Upper Canada Transmission to provide Notice to all affected parties and stakeholders so that all may have an opportunity to provide their comments.

**Respectfully,**



**Chris Wray, AMCT  
CAO / Clerk-Treasurer**

cc: Algoma Coalition Members  
NESMG  
Mayor and Council  
FONOM  
NOMA  
ROMA  
M. Mantha – MPP  
P. Cassan – Wishart Law Firm  
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R. Reid – N-Sci Technologies Inc  
Ontario Growth Secretariat  
L. Bouchard – Berzel - MNDM