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30 March 2017

Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto ON M4P 1E4

Dear Ms. Walli:

Re: EB-2016-0137/EB-2016-0138/EB-2016-0139
Applications to serve the Municipality of Arran-Elderslie, the Municipality of Kincardine and the Township of Huron-Kinloss with natural gas distribution services

We are counsel to Greenfield Specialty Alcohols Inc. (**GFSA**) in the above-mentioned proceeding (the **Proceeding**). Pursuant to the Ontario Energy Board's (the **Board's**) Procedural Order No. 3, dated March 23, 2017, and further to and supported by GFSA's Notice of Intervention dated January 11, 2017 (attached hereto as Appendix "A"), GFSA hereby applies for intervenor status for Phase 2 as a directly-affected natural gas customer and confirms its application for cost eligibility for both Phases of the Proceeding under Rule 39 of the Board's *Rules of Practice and Procedure* and section 3.03 of the Board's *Practice Direction on Cost Awards*. GFSA is coordinating its intervention with other major industrial entities that will be directly affected by the provision of natural gas service in the proposed service area, including Bruce Power, 7 Acres, and Snobelen Farms. Together, these entities represent a significant part of proposed service area's the natural gas demand.

If the Board grants GFSA's request for intervenor status in Phase 2, GFSA requests that further communications with respect to the Proceeding be sent to the following:

GreenField Specialty Alcohols Inc.
98 Walker Drive, Suite 220
Brampton, ON L6T 4H6

Attention: John Creighton, Managing Director, Logistics
Telephone: 416-304-1700 x 8426
Facsimile: 905-793-5816
Email: John.Creighton@gfsa.com

AND TO ITS COUNSEL

DeMarco Allan LLP

200-5 Hazelton Avenue
Toronto, ON M5R 2E1

Attention: Elisabeth DeMarco
Telephone: 647-991-1190
Facsimile: 1-888-734-9459
Email: lisa@demarcoallan.com

Attention: Cary Ferguson
Telephone: 1-888-389-5798
Facsimile: 1-888-734-9459
Email: cary@demarcoallan.com

Attention: Jonathan McGillivray
Telephone: 1-888-389-5798
Facsimile: 1-888-734-9459
Email: jonathan@demarcoallan.com

Yours very truly,



Lisa (Elisabeth) DeMarco

APPENDIX "A"

ONTARIO ENERGY BOARD

IN THE MATTER OF the Municipal Franchises Act, R.S.O. 1990, c.M.55, ss. 8(1), 9(3) and 9(4) and the Ontario Energy Board Act, S.O. 1998, c.15 (Schedule B), ss. 21(5) and 36;

AND IN THE MATTER OF Applications by EPCOR Southern Bruce Gas Inc. for approval of franchise agreements and Certificates of Public Convenience and Necessity for the Municipality of Arran-Elderslie, the Municipality of Kincardine and the Township of Huron-Kinloss.

EB-2016-0137

EB-2016-0138

EB-2016-0139

NOTICE OF INTERVENTION

GREENFIELD SPECIALTY ALCOHOLS INC.

January 11, 2017

A. Application for Intervenor Status

1. GreenField Specialty Alcohols Inc. (**GreenField**) hereby requests intervenor status in the Ontario Energy Board (the **Board**) EB-2016-0137 / EB-2016-0138 / EB-2016-0139 matter reviewing EPCOR Southern Bruce Gas Inc.'s (**EPCOR**) applications for approval of franchise agreements and Certificates of Public Convenience and Necessity for the Municipalities of Arran-Elderslie, Kincardine and the Township of Huron-Kinloss (the **Applications**), pursuant to Rule 22 of the Board's Rules of Practice and Procedure.

B. GreenField and its Interest in the Proceeding

2. GreenField is Canada's leading specialty alcohols producer, with a focus on corn-based bulk industrial alcohol, packaged alcohol, fuel ethanol, and associated agricultural co-products. GreenField has a leading share of the industrial alcohol market and is also the largest ethanol producer in Canada, with an export business in grain neutral spirits (alcohol containing 95% alcohol by volume, or 190-proof).
3. GreenField is the owner and operator of the Tiverton Industrial Alcohol distillery located in the Bruce Energy Centre in the Municipality of Kincardine (the **Tiverton Plant**). Industrial alcohol plants, such as the Tiverton Plant, are energy intensive. GreenField is a major industrial natural gas customer, with demand from the Tiverton Plant representing approximately half of the demand for natural gas in the Arran-Elderslie, Kincardine, Huron-Kinloss service area. GreenField's Tiverton operations stand to be directly and materially affected by the Applications, which are likely to affect GreenField's natural gas procurement and its rates and terms of potential service.
4. GreenField is generally supportive of efforts to construct natural gas supply infrastructure in those Ontario communities that presently have no natural gas supply. GreenField also recognizes that these will be the first applications determined in accordance with the Board's decision in EB-2016-0004.

C. Nature and Scope of GreenField's Intended Participation

5. GreenField intends to be an active participant in this proceeding, and will act responsibly to coordinate with other intervenors where common issues may arise and be otherwise addressed. GreenField intends to participate to request information, participate in any requisite motions, test evidence through the stipulated processes, submit written interrogatories and

provide argument. GreenField may also submit evidence, subject to the development of the record in this matter.

D. Costs

6. GreenField hereby requests cost eligibility in this proceeding. In accordance with section 3.03 of the Board's Practice Direction on Cost Awards, GreenField:

- (a) is a direct, large industrial consumer in the proposed franchise areas to be served;
- (b) represents the unique interests and policy perspectives of large industrial customers that have been forced to seek energy alternatives in an area that has previously not been served by natural gas and should benefit by being served by natural gas; and
- (c) has land that may be affected by the process, depending on the applications to be filed by EPCOR or other applicants.

In this manner, GreenField represents many interests that are central to the Board's mandate and its consideration of the Application and its interests are not otherwise likely to be represented by other participants in this proceeding. GreenField therefore submits that it falls squarely within the Board's cost eligibility guidelines, and therefore warrants cost eligibility.

7. Further, GreenField represents a significant part, if not a majority, of the natural gas demand in the proposed service area and therefore should not be denied cost edibility.

E. GreenField's Representatives

8. If the Board grants GreenField intervenor status, GreenField requests that further communications with respect to this proceeding be sent to the following:

GreenField Specialty Alcohols Inc.

98 Walker Drive, Suite 200
Brampton, ON L6T 4H6

Attention: John Creighton, Managing Director, Logistics
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Attention: Cary Ferguson
Tel: 1-888-389-5798
Facsimile: 1-888-734-9459
Email: cary@demarcoallan.com

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
11th day of January, 2017



Lisa (Elisabeth) DeMarco
DeMarco Allan LLP
Counsel for GreenField