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May 4, 2018

VIA RESS AND COURIER

Ms. 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 (South Bruce Proceeding)
Response to EPCOR Southern Bruce Gas Inc. (EPCOR) Objection to Cost Claim of
Greenfield Global Inc. (Greenfield)**

We are counsel to Greenfield in the South Bruce Proceeding. This letter responds to EPCOR's objection to Greenfield's cost claim, wherein EPCOR raised concerns regarding the number of hours Greenfield claimed for work in Phase One of the South Bruce Proceeding and the time spent by Greenfield on various activities.

Greenfield respectfully submits that: (i) the number of hours Greenfield claimed for work in Phase One was consistent with the Board's procedural direction in the South Bruce Proceeding and specifically with Procedural Order No. 3 (**PO3**), issued March 23, 2017, and (ii) the time spent by Greenfield on various activities, including interrogatories, was reasonable, efficient, and extensively relied upon by the Board and Board Staff in their consideration of the South Bruce Proceeding.

(i) Phase One Limit on Number of Hours of Work

Greenfield acknowledges the Board's 8-hour Phase One time limitation in PO3 and notes that it claimed 6.5 hours of work in relation to Phase One, well within the limit set out by the Board. Greenfield submits that the 8-hour limit on work in relation to Phase One of the South Bruce Proceeding applies to submissions on the draft Issues List and draft Filing Requirements drafted filed between March 3, 2017, when Procedural Order No. 2 (**PO2**) was issued, and April 27, 2017, when Phase One submissions were due.

The Board first introduced its intention to "consider the selection of the distributor to serve the areas covered by the EPCOR Applications in a staged manner" in PO2 (page 2). The Board provided in PO2 that it would "first receive submissions on the preliminary threshold issues related to the criteria and the filing requirements for the supply and rate proposals that it expects to require from EPCOR and Union" (at page 2). The Board attached the draft Issues List and draft Filing Requirements as schedules to PO2. The Board further provided that it would "then hear the competing proposals to be filed by EPCOR and Union in an oral hearing as part of the second phase" (at page 2). Procedural Order No. 5 (**PO5**), issued on April 20, 2017, further provides that "submissions regarding the draft Issues List and the draft Filing Requirements identified in [PO2]" must be filed by April 27, 2017.

Greenfield has claimed additional time in relation to the South Bruce Proceeding for work undertaken during the period beginning on December 21, 2016, when the Notice of Application was issued, and ending at the start of Phase Two, but this time does not reflect time-capped work performed in relation to Greenfield's Phase One submissions.

(ii) Reasonableness of Time Spent

Greenfield further respectfully submits that the time it spent on various activities in relation to the South Bruce Proceeding, including interrogatories, was reasonable, efficient, and of direct value and assistance to the Board in its consideration of the South Bruce Proceeding. The Board's reliance on a significant number of Greenfield's submissions and interrogatories is outlined in the cover letter accompanying Greenfield's cost claim, and further supported by the facts that:

- (a) Greenfield efficiently and effectively coordinated the interests of other ratepayers (Bruce Power, 7 Acres, and Snobelen Farms), greatly reducing the cost of four parties intervening on an individual basis. The Board acknowledged this coordination effort in Procedural Order No. 5 (at page 3), issued April 20, 2017; and
- (b) Greenfield's submissions on industrial volumes were explicitly and extensively cited in Procedural Order No. 10, issued February 22, 2018, and appear to have directly and effectively assisted the Board identifying and clarifying interrogatories for EPCOR.

Greenfield therefore respectfully requests that the Board award it 100% of its eligible costs.

Yours very truly,



Lisa (Elisabeth) DeMarco