

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by Integrated Grain Processors Co-operative Inc., pursuant to section 42(3) of the Ontario Energy Board Act, 1998, for an order requiring Natural Resource Gas Limited to provide gas distribution services;

AND IN THE MATTER OF an Order to review capital contribution costs paid by Integrated Grain Processors Co-operative Inc., to Natural Resource Gas Limited pursuant to Section 19 and 36 of the Ontario Energy Board Act, 1998.

**NOTICE OF MOTION OF
INTEGRATED GRAIN PROCESSORS CO-OPERATIVE INC.
and IGPC ETHANOL INC.**

Pursuant to the Ontario Energy Board's Rules of Practice and Procedure (the "Rules"), Rule 29.03, Integrated Grain Processors Co-operative Inc. and IGPC Ethanol Inc. ("IGPC") will make a motion to the Board for the matter described herein on a date and at a time to be determined by the Board at the Board's office located at 2300 Yonge Street, Toronto, Ontario. IGPC requests the motion be heard orally.

THIS MOTION IS FOR:

1. An order or orders of the Board:
 - (a) Requiring NRG to provide a full and adequate response to each interrogatory identified in Appendix A to this Notice of Motion;
 - (b) Providing for the proper conduct and scheduling of this motion; and
 - (c) Providing such other relief as Counsel may request and the Board deem just and reasonable.

THE GROUNDS FOR THIS MOTION:

1. Rule 29.01 requires a party to provide “full and adequate response to each interrogatory”.
2. Rule 29.03 provides a party with the right to seek direction from the Board where another party has failed to provide a satisfactory response.
3. NRG has refused to respond to certain interrogatories or it has provided answers which are not full or adequate and/or which fail to respond to the question asked.
4. The responses of NRG to the interrogatories identified in Appendix A to this Notice of Motion are required to assist the Board in its determination of the issues in this proceeding.
5. Responses from NRG are required to allow other parties to understand and review, prior to the hearing, the case NRG intends to make and the evidence upon which it intends to rely.
6. Rules 8, 13 and 14 of the Rules.

MATERIALS TO BE RELIED UPON

IGPC will rely upon the following materials:

- (a) The evidence in this proceeding including the approved Issues List and NRG’s response to Interrogatories filed June 28, 2013;
- (b) The Ontario Energy Board Rules of Practice and Procedure; and
- (c) Such other materials as Counsel may advise and this Board will permit.

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

INTEGRATED GRAIN PROCESSORS CO-
OPERATIVE INC. and IGPC ETHANOL INC.

Original signed “Scott Stoll”

By its Counsel
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TO: Ontario Energy Board
Kirsten Walli, Board Secretary
27th Floor, P.O. Box 2319
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AND TO: Intervenors

**REVISED APPENDIX A
TO NOTICE OF MOTION**

IR #	Question #
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Interrogatories Asked by IGPC

1	1(d), 2(a) and (d), and 3(c)
3	1 through 9
4	
6	(a), (b), (d) and (f)
8	(a) through (f)
10	(d) and (e)
11	(d)
12	(b), (h) and (i)
13	(a), (b), (e), (g), (h)
15	(a) through (g)
16	(a), (b) and (e)

Revision

Interrogatories Asked by Board Staff

2	(b), (c), (d), (e) and (f)
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