

October 3, 2014

Ms. Kristin Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli

**Re: Greenfield South Power Corporation
Application for Certificate of Public Convenience and Necessity
Board File No. EB-2014-0299**

We are counsel to Union Gas Limited ("Union") and hereby submit Union's request for intervenor status in the above noted matter.

Union also requests that the Board hear this matter by way of an oral hearing. In Union's view, this application, as well as Union's Leave to Construct application (EB-2014-0147) dealing with supply to the same natural gas fired power plant, raise unique issues relating to the interests of customers and the "by-pass" of Union's system. As such, Union believes that an oral hearing will enable it to fully and fairly present its case and allow both the Board and interested parties to fully canvas these issues in the most efficient and expeditious manner.

Yours truly,

[Original signed by]

Charles Keizer

cc (by email): Hubert Vogt, Greenfield South / Eastern Power Limited
Mike Richmond, McMillan LLP

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15, Sched. B., as amended;

AND IN THE MATTER OF an Application by Greenfield South Power Corporation for a certificate of public convenience and necessity, pursuant to section 8 of the *Municipal Franchises Act*, R.S.O. 1990, c. M. 55.

**REQUEST FOR INTERVENOR STATUS
OF
UNION GAS LIMITED**

1. Union Gas Limited ("Union") hereby applies for Intervenor Status in this proceeding pursuant to the above-captioned matter.
2. Union is an Ontario Corporation with its Registered Office at the Municipality of Chatham-Kent, in the Province of Ontario. Union is a regulated public utility which combines the operations of selling, distributing, transmitting and storing natural gas within the meaning of the *Ontario Energy Board Act*, 1998.
3. Union currently has the Certificate of Public Convenience and Necessity to construct works to supply gas in all of the Township of St. Clair (EB-2010-0384), which Union considers to be exclusive unless the Board specifically orders services to the contrary.
4. Greenfield South, an affiliate of Eastern Power Limited, is developing a 300 MW natural gas-fired combined cycle electricity generating facility in the Township of St. Clair on a 100-acre site on Oil Springs Line near Greenfield Road. Greenfield South has a Clean Energy Supply Agreement with the Ontario Power Authority.
5. In addition to proposing various service options to Greenfield South, Union has proposed building a customer station on the Sarnia Industrial Line in order to supply the proposed generation facility. Some piping would be required but all would be enclosed within Union's fencing. Union has filed an application (EB-2014-0147) with the Board under section 91 of the *Ontario Energy Board Act* seeking leave to construct approval of the aforementioned facilities ("Union's LTC Application").

6. Union has received a copy of the Application and requests one copy of the submissions of Greenfield South and other participants, and any notices or correspondence. This includes any revisions or amendments which may be made prior to the commencement of or during the hearing of this Application. Union's preference is to receive searchable electronic versions of filings in this proceeding.
7. It is Union's intention to be an active participant in this proceeding. Union will submit evidence (both as stated below and in response to Greenfield South's application), ask interrogatories, cross-examine witnesses, advance argument and participate in the hearing.
8. Union therefore requests that it be granted intervenor status in the proceeding in which the Board considers the Application.
9. As noted, Union's LTC Application is for leave to construct facilities to serve the natural gas-fired combined cycle electricity generating facilities being developed by Greenfield South Power Corporation with its affiliate Eastern Power Limited as the Green Electron Power Plant. Union hereby requests that the two applications be considered by the Board in a joined proceeding and that the evidence filed by Union in Union's LTC Application be admitted into evidence in this proceeding.
10. Communications relating to this intervention should be directed to:

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and

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11. Union will not be seeking an award of costs.

DATED at the Municipality of Chatham-Kent, in the Province of Ontario this 3rd day of October, 2014.

UNION GAS LIMITED

[Original signed by]

Per: _____
Charles Keizer
Torys LLP