

Reply to the Attention of	Laura Brazil
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Our File No.	211923
Date	October 9, 2014

BY EMAIL

Ms. Kristin Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario 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 write further to the letter and request for intervenor status of Union Gas Limited (“Union”), both dated October 3, 2014. In the letter and request, Union seeks intervenor status, an oral hearing of this matter, and the joining of this matter with Union’s application bearing no. EB-2014-0147 (the “Union Application”). This letter sets out the response of the applicant Greenfield South Power Corporation (“Greenfield South”) to these three issues.

Greenfield South does not oppose Union’s request to intervene.

Greenfield South submits that a written, not oral, hearing is the most appropriate procedure for this matter. Construction of the Greenfield Electron Power Project (the “GEPP”) is already well advanced and the GEPP is scheduled to be operational for gas commissioning in mid-December 2014. Greenfield South has accordingly requested an expedited hearing. An oral hearing would take considerably longer than a written hearing and would likely cause a significant delay in the commissioning of the GEPP. The onus is on Union to demonstrate that there is a good reason not to proceed by way of a written hearing. Union has not sufficiently demonstrated that it would be unable to fully and fairly present its case in a written hearing.

It is also not appropriate to join this application with the Union Application. If Greenfield South succeeds in obtaining a Certificate of Public Convenience and Necessity, the Union Application would be rendered moot. Even if Greenfield South does not succeed in obtaining a Certificate, Greenfield may opt not to obtain its natural gas supply from Union such that the Union Application would still be moot. In either of these circumstances, joining this matter with the Union Application will have resulted in needless delay and the unnecessary expenditure of the Board and participants’ time and resources.

In the event that Greenfield does not obtain the Certificate and chooses to obtain its supply of gas from Union, the Union Application can proceed at that time. Union has not provided any reason why its application cannot be heard after this matter.

It would be unfair to allow Greenfield South's relatively simple application for a Certificate under the *Municipal Franchises Act* to be complicated by joining it with Union's leave to construct application under the *Ontario Energy Board Act, 1998*. This would result in delay and increased costs in the determination of Greenfield South's application.

Greenfield South should have the ability to have its application heard and determined on the merits of the application itself - either a Certificate is warranted or it is not. Its application should not be considered by comparison to or in competition with a separate application by a different party under different legislation in lieu of being considered on its own merits. As an intervenor in this matter, Union will have an opportunity to present any relevant evidence and argument, without the need to join this matter with the Union Application.

Yours truly,



Laura Brazil

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