

November 5, 2014

COURIER, EMAIL AND RESS

Ms. Kirsten 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**

This letter is in respect of the letter and documents filed today, November 5, 2014, in the above noted proceeding by the applicant Greenfield South Power Corporation (the "Applicant"). The filing of this evidence is contrary to the Board's Procedural Order No. 1 and should not be accepted by the Board without additional time granted to Union and any other party to review the supplementary evidence and to determine what evidence Union intends to file in respect of both the Applicant's evidence filed on September 25, 2014 (as amended) and the supplementary evidence filed today. As a result, Union will not be filing its evidence today.

Pursuant to Procedural Order No. 1, intervenors and Staff were given the opportunity to file evidence on November 5, to be followed by an interrogatory process in respect to both the Applicant's and any intervenor evidence. The Order did not establish dates for the Applicant to file additional evidence. Notwithstanding that fact, without notice and without seeking a determination from the Board to amend the Order, the Applicant filed extensive evidence at 2:30 pm on the day set aside by the Board for intervenor and Staff evidence. Pending an amendment of the Board's Order, the supplementary evidence should not be accepted by the Board.

The supplementary evidence filed by the Applicant is extensive. It includes an expert's report as well as a 141 page document that includes multiple attachments. A brief review of the evidence reveals various calculations and assertions that need further consideration. Union intends to file evidence in this proceeding and had intended to file evidence today pursuant to the Board's Order on the basis of the record existing at the time of the Board's Order. Given the timing of the Applicant's filing and its detailed nature, it would be unfair to Union to require it to split its evidence between the Applicant's two filings and that Union should be able to file evidence that contemplates the Applicant's evidence as a whole. Furthermore, it would be unfair to not give Union an appropriate amount of time to review and consider the Applicant's evidence before Union files its evidence in this matter.

As a result, Union requests that the Board provide Union with additional time to file its evidence. With respect to the timing of that filing, Union needs sufficient time to review the documentation of the supplementary material, assess any calculations and assertions and to draft and finalize evidence accordingly. Given that it has just received the Applicant's documents, Union is unable to say at this time how much time it would require to complete the foregoing. However, Union should be able to do so before the end of this week. At which time, Union will advise the Board in writing as to the amount of time it requires to file evidence. Union will at that time request that the Board amend its Order as to the filing of evidence and the dates for interrogatories.

Yours truly,

A handwritten signature in black ink, appearing to be 'Charles Keizer', with a long horizontal flourish extending to the right.

Charles Keizer

CK/

cc (by email): Hubert Vogt, Greenfield South Power Corporation
 Mike Richmond, McMillan Binch LLP
 Miriam Heinz, Ontario Power Authority