

Reply to the Attention of	Mike Richmond
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Our File No.	211923
Date	November 6, 2014

COURIER, E-MAIL 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 response to the letter of Torys LLP, counsel to Union Gas Limited (“**Union**”), filed last night, November 5, 2014 (the “**Union Letter**”).

The Applicant, Greenfield South Power Corporation (“**Greenfield**”), does not object to Union’s request for more time to review the Supplementary Evidence in order to revise its own evidentiary submissions. We believe that one week would be an appropriate period of time for the requested extension. Procedural Order No. 1 dated October 28, 2014 gives Greenfield only one week to review all of Union’s evidence. It is more than fair for Union to receive the same period of time to review only the new portions of Greenfield’s evidence. Union has had the rest of Greenfield’s evidence for six weeks.

It was necessary for Greenfield to file Supplementary Evidence. Greenfield’s Pre-Filed Evidence was filed on September 25, 2014, over a month before Procedural Order No. 1 was issued. At the time that the Pre-Filed Evidence was submitted, there was no List of Issues, and Greenfield could not have known which issues would ultimately be considered by the Board (*e.g.* whether the Board would find it necessary to compare the Union and Vector gas transportation services).

Only after the List of Issues was published on October 28 was it clear that further evidence was necessary in order to assist the Board. It is not unusual for applicants to submit additional evidence after the List of Issues is released for this very reason. However, in the interest of fairness, Greenfield ensured that its materials would be submitted by no later than the deadline assigned to Intervenor and Board Staff.

We respectfully request that the Board consider the following revised timeline for this process in order to (a) give Union a chance to submit further evidence after having reviewed all of Greenfield's evidence, and (b) equally give Greenfield a chance to submit reply evidence, if necessary, after having reviewed Union's evidence:

1. The Intervenors to file their evidence by Wednesday, November 12;
2. Greenfield to give notice to the Board and the Intervenors by end of day on Thursday, November 13, 2014 as to whether it wishes to file reply evidence or not. If it elects to file reply evidence, the reply evidence will be due on November 19, 2014. The reply evidence must be restricted to evidence that responds directly to the Intervenors' evidence;
3. Interrogatories due on November 19, 2014 (if Greenfield elects not to file reply evidence) or on November 26, 2014 (if Greenfield elects to file reply evidence);
4. Responses to interrogatories due on November 26, 2014 (if Greenfield elects not to file reply evidence) or on December 3, 2014 (if Greenfield elects to file reply evidence).

In our view, such a process would treat all parties fairly, but not delay the process any longer than is necessary.

Yours truly,



Mike Richmond

cc. Charles Keizer, Torys LLP
Miriam Heinz, Ontario Power Authority
Hubert Vogt, Greenfield South Power Corporation