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April 22, 2016

Filed on RESS and Sent via Courier

Kirsten Walli
Board Secretary
2300 Yonge Street, Suite 2700
Toronto, ON
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Dear Ms. Walli:

Re: EB-2016-0004 – Generic Proceeding on Natural Gas Expansion

We are counsel to GreenField Specialty Alcohols Inc. (**GreenField**) in the above-mentioned proceeding. Please find attached the responses from GreenField to the interrogatories received from the Building Owners and Managers Association (**BOMA**).

Should you have further questions on this matter, please do not hesitate to contact me.

Yours very truly,

Lisa (Elisabeth) DeMarco

Encl.

GREENFIELD RESPONSE TO BOMA INTERROGATORY #87

Interrogatory: 87

Reference: Evidence of Greenfield Specialty Alcohols, page 2

Preamble: Greenfield Specialty Alcohols Inc. (**Greenfield**) is the owner and operator of the Tiverton Industrial Alcohol distillery located in the Bruce Energy Centre in the Municipality of Kincardine.

Question: Please describe the commercial arrangements under which GreenField acquires its supply of steam from Bruce Power. Does GreenField have what is in effect a tolling arrangement with Bruce Power? In other words, it supplies Bruce Power with CNG and pays a fee for it to be converted to steam and returned? Please discuss.

Response: Although the company is not at liberty to disclose its confidential contractual terms with Bruce Power, it understands that Bruce Power's interest in the outcome of this hearing is similar to that of GreenField. However, to be clear, GreenField sells steam to Bruce Power, not CNG.

GREENFIELD RESPONSE TO BOMA INTERROGATORY #88

Interrogatory: 88

Reference: Evidence of Greenfield Specialty Alcohols, page 3

Question:

a) If GreenField's Tiverton plant were to acquire pipeline gas from Union pursuant to an expansion, what would its annual delivered cost of gas be, and how would that compare to an energy equivalent basis to its gas costs plus fee to Bruce Power for producing steam and delivering it to GreenField? What would be the minimum term available for GreenField pursuant to the applicable rate? What infrastructure would GreenField need to install, for example a gas-fired boiler? What would the retrofit cost be?

b) Does GreenField have a minimum contract term with Bruce Power, comparable to the teen Union would require? What about comparable "minimum-take" provisions?

c) Has GreenField had discussions with other companies that propose alternative pipeline projects or other alternative delivery arrangements, e.g. CNG or LNG to its facility? How do their rates compare with the cost of GreenField's current energy costs?

d) Does GreenField own the Mt. Forest compressor and the truck fleet?

e) How does GreenField assess the risks of switching from its current CNG/Bruce Power supply arrangements to alternative arrangements, either pipeline or otherwise?

f) Under what circumstances would GreenField serve as an anchor load for a new pipeline project?

Response:

a) Please see response in Exhibit R5.Greenfield.Board Staff.2(a).

The company is unable to compare its current costs with that of pipeline gas supply as the rules, costs and commercial arrangements for rural gas expansion have not been determined. Once these potential arrangements are determined, GreenField looks forward to considering options and discussing with the successful proponent.

GreenField has recently made considerable investments in dual gas and oil fired boilers to provide a reliable and efficient supply of steam to both its own plant and to Bruce Power. Oil is used for energy backup in the event roads are closed and CNG trucks cannot meet the natural gas demand at the plant. Other than the polar vortex year of 2013/2014, the plant rarely burns oil to produce steam and CNG is a very reliable energy supply system. The cost to supply energy using CNG was determined to be the most advantageous given the options available to the company. GreenField anticipates the conversion cost for pipeline gas should comprise only the cost of connection to the pipeline and a meter station.

b) GreenField's contractual arrangement with Bruce Power is confidential. Bruce Power has agreed to work with GreenField to find a reasonable contract term and price and to lower the costs of steam supply in the event of a new gas pipeline.

Please see response in Exhibit R5.Greenfield.BOMA.87. GreenField's preference is to have flexible price and term options in order to provide for economic benefits when compared to the status quo.

c) GreenField constructed and operates its own CNG supply system. At the time of construction, the company believed that given the combined proximity of the Tiverton plant and the resources available (including a 24/7 control room and maintenance staff), it could operate the system reliably and at a lower cost than a third party provider.

d) GreenField owns the Mount Forest compressor station and operates certain trailers.

e) GreenField will conduct thorough due diligence and consider the commercial, regulatory, environmental, and safety risks and benefits of any alternate energy supply arrangements in relation to its current CNG supply arrangements, which it views to be a safe, reliable and reasonably economic current method of supplying natural gas to the Tiverton plant.

f) GreenField would assess any pipeline project options in a manner similar to any other capital project. Please see response in Exhibit R5.Greenfield.BOMA.88(e).