



Lisa (Elisabeth) DeMarco
Senior Partner
5 Hazelton Avenue, Suite 200
Toronto, ON M5R 2E1
TEL +1.647.991.1190
FAX +1.888.734.9459
lisa@demarcoallan.com

27 April 2016

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2700-2300 Yonge Street

Dear Ms. Walli:

Re: EB-2016-0004 Interrogatory Responses and Direct and Cross Examination Timing

We are counsel to GreenField Specialty Alcohols Inc. (**GreenField**). In accordance with the Board's direction of April 26, 2016, and pursuant to Rule 27.03 of the Board's *Rules of Practice and Procedure*, GreenField hereby provides its support for various parties' anticipated requests for full and adequate interrogatory responses with additional reasons. We also hereby provide witness availability and time estimates for GreenField's direct and cross examination at the oral hearing.

GreenField supports the anticipated requests of the Schools Energy Coalition and Union Gas Ltd. for full, adequate and complete responses to the following interrogatories:

- Exhibit S4.EPCOR.SEC.7;
- Exhibit S4.EPCOR.SEC.8;
- Exhibit S4.EPCOR.SEC.12;
- Exhibit S4.EPCOR.SEC.13;
- Exhibit S4.EPCOR.SEC.14;
- Exhibit S4.EPCOR.SEC.15;
- Exhibit S4.EPCOR.Union.2;
- Exhibit S4.EPCOR.Union.3(b);
- Exhibit S4.EPCOR.Union.5(a)-(b);
- Exhibit S4.EPCOR.Union.8(a)-(c);
- Exhibit S13.South Bruce.SEC.3;
- Exhibit S13.South Bruce.SEC.4;
- Exhibit S13.South Bruce.Union.1(a);
- Exhibit S13.South Bruce.Union.2(a);
- Exhibit S13.South Bruce.Union.3(a); and
- Exhibit S13.South Bruce.Union.4(a) (the **Subject IRs**).

Supporting Rationale

Each and all of the Subject IRs relate to the specific information and processes that have been followed to date in the single instance that a Request for Information has been used to support a "competitive" natural gas expansion process. We submit that the Subject IRs will provide very valuable insight and information to the Board and intervenors in assessing Issues 3, 4, 5, 6, 7, 8 and 9 from the Issues List. This information requested in the Subject IRs is very relevant and important to GreenField, a large industrial customer in South Bruce, in assessing and advocating on: (i) the proposed process; (ii) the requested financial information; (iii) the efficacy of competition; (iv) the customer impact; and (v) the transparency and openness of the process and consultation with the relevant municipalities. Each of these considerations are directly relevant to the Board in assessing and determining a process for natural gas expansion in remote communities.

Further, requiring responses to the Subject IRs and the related customer relevant information is consistent with the Board's objectives in s. 2 of the *Ontario Energy Board Act*, which include: facilitating competition in the sale of gas to users (s. 2(1)) and protecting the interests of consumers with respect to prices and the reliability and quality of gas services (s. 2(2)). This information is also critical to ensure that GreenField can participate fully and fairly in accordance with its common law rights to be heard in accordance with the principles of *audi alteram partem*, procedural fairness, and the rules of natural justice.

GreenField is of the view that the "process matters" and will be exceedingly important in the Board's final determination of a generic review. GreenField therefore encourages responses to the Subject IRs in order to ensure the integral transparency, and allow GreenField and all other affected major consumers to be able to adequately assess their energy options and obligations, particularly when the customer represents approximately 50% of the demand for natural gas in the service area, as GreenField does in South Bruce.

Hearing Schedule

GreenField intends to cross-examine EPCOR, the South Bruce Municipalities, and Union Gas. GreenField currently estimates a total of 90 minutes for its cross-examination of EPCOR, 120 minutes for its cross-examination of the South Bruce Municipalities, and 20 minutes for its cross-examination of Union, on the understanding that these estimates are subject to change as a result of other parties' cross examinations (and in an attempt to avoid any duplication). GreenField reserves its rights to cross-examine all other parties, and in particular to cross examine the Ontario Geothermal Association, for an estimate of 15 minutes each, should issues related to GreenField arise in the direct evidence of each of these parties.

GreenField's direct evidence will be provided by John Creighton. We estimate that direct examination will take approximately 20 minutes. Mr. Creighton is available all days other than May 10 and May 11, 2016.

Please do not hesitate to contact us should you have any questions.

Yours very truly,

A handwritten signature in black ink, consisting of a large, stylized initial 'L' followed by a long, sweeping horizontal line that ends in a small arrowhead.

Lisa (Elisabeth) DeMarco