



**Terra International
(Canada) Inc.**

161 Bickford Line

PO Box 1900

Courtright, Ontario N0N1H0

cfindustries.com

March 3, 2021

Board Secretary
Ontario Energy Board
P.O. Box 2319
27th Floor, 2300 Yonge Street
Toronto ON M4P 1E4

By email: boardsec@oeb.ca

Dear Sir/Madam:

RE: Terra International (Canada) Inc. Electricity Generation Licence EG-2000-0299

I am writing on behalf of Terra International (Canada) Inc., a subsidiary of CF Industries Holdings Inc., to request an extension to the term of the Electricity Generation Licence (EG-2000-0299) for the Courtright Nitrogen Manufacturing Complex ("Courtright"), as permitted under section 5 of the licence. The licence expires on March 15, 2021. We make this request as directed via recent correspondence with Industry Relations, attached.

The Courtright facility purchases power from the Independent Electricity System Operator ("IESO") to supplement the electricity that the facility generates, which is used on site. We understand that Courtright is not required to hold an electricity generation licence because the facility does not generate electricity for sale (despite that the licence currently permits both the purchase and sale of electricity). Insofar as the facility is only purchasing and not generating electricity for sale, we understand that it is only required to hold an electricity wholesale licence for the purchase of power from the IESO. We are currently preparing an application to the Ontario Energy Board ("OEB") for a wholesale electricity licence and will be filing it shortly. However, we require additional time to collect the necessary information, as outlined in the attached.

We place a high priority on regulatory compliance and continuing safe, reliable operations. We are committed to completing the application for a wholesale electricity licence in a fulsome, timely manner. We request that the OEB extend the term of the current licence until the new application and associated review process can be completed. This extension will allow the Courtright facility to remain in compliance with licensing requirements for purchasing power from the IESO under the terms of the existing licence. Once the electricity wholesale licence is issued, the existing licence will no longer be required.

We confirm that the address, contact information and facility particulars remain unchanged.

We consent to disposing of this matter without a hearing and confirm that no other person will be adversely affected in a material way by the outcome of this matter, as per s. 21(4)(b) of the OEB Act.

Thank you for your assistance.

Sincerely,



Greg Kennette
General Manager

CC: OEB Industry Relations

Encl.

From: [Industry Relations](#)
To: [Burgel, Nicholas](#)
Subject: [EXTERNAL] OEB FILE No. IRE-2021-0137 - Renewals - Application Requirements - RESPONSE
Date: Thursday, February 25, 2021 3:02:51 PM

Dear Nick Burgel,

This is our response to the enquiry you submitted to Industry Relations.

Hello and thanks for your response,

We would like to understand if we are able to submit a request for licence extension to prepare the documents for the wholesaler licence. It is a significant amount of information we need to pull together from across the corporation. In a previous communication with the OEB it was implied that the request for extension needed to be submitted along with the application for renewal. If we were to submit just a request for extension, would this likely be approved?

Thanks,

Nick

Under normal circumstances, i.e. when you apply for the same licence type, a licence term extension request is filed along with a licence application. In your case, you will be applying for a different licence type. It is acceptable to file a request to extend your current electricity generation licence to remain in compliance with licensing requirements, and it should be approved. In your letter requesting your electricity generation licence extension, please explain that based on your current situation, you don't require to hold an electricity generation licence as you don't generate electricity for sale, but you require to hold an electricity wholesale licence as you are purchasing power from the IESO to supplement electricity that you generate. As your EG licence expires on March 15, 2021, you are requesting an extension of the term of the licence to continue purchasing power from the IESO (EG licence allows you to do so), and once the EW licence is issued, the EG licence won't be required.

Please mention that you are in the process of preparing an application for the EW licence and will be filing it shortly. You can add a sentence explaining why you have not done it earlier.

Thank you for your enquiry. I hope you find this information helpful.

Regards,
Industry Relations

The response to this enquiry represents the views of Ontario Energy Board (OEB) staff, based on the specific set of facts provided to us in the enquiry and the legal and regulatory requirements currently in place – if the facts or the requirements were to change, the response might be different. The response is not offered as and does not constitute legal advice, and is not binding on the OEB.

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