

July 19, 2021

**Sent By Email (BoardSec@oeb.ca)**

Kristen Walli, Board Secretary  
Ontario Energy Board  
Suite 2700  
2300 Yonge Street  
Toronto ON M4P 1E4

Norton Rose Fulbright Canada LLP  
222 Bay Street, Suite 3000, P.O. Box 53  
Toronto, Ontario M5K 1E7 Canada

F: +1 416.216.3930  
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**Jennifer Teskey**  
+1 416.216.2303  
[jennifer.teskey@nortonrosefulbright.com](mailto:jennifer.teskey@nortonrosefulbright.com)

Dear Ms. Walli:

## **Application for an Electricity Generation Licence – GreenFirst Forest Products (QC) Inc. (GreenFirst)**

We are counsel to GreenFirst. Please find enclosed an application for an Electricity Generation Licence in relation to the Chapleau and Kapuskasing sawmills, which is being filed by GreenFirst pursuant to section 60 of the *Ontario Energy Board Act, 1988* (the **Act**), together with supporting documentation. Once receipt of this application is confirmed, we would be pleased to make arrangements for payment of the \$100.00 application fee via EFT, in accordance with the Board's COVID-19 protocols.

As you may be aware, Rayonier A.M. Canada G.P. and Rayonier A.M. Canada Industries Inc. (together **RYAM**) and GreenFirst have entered into an asset purchase agreement pursuant to which GreenFirst has acquired certain assets from RYAM (the **Transaction**), including two load facilities located at Chapleau and Kapuskasing, Ontario (the **Load Facilities**). The Transaction is expected to close on July 31, 2021.

The Chapleau facility includes a biomass generator with a nameplate capacity of 7.1 MW, that feeds into Hydro One Network Inc.'s distribution system. The Kapuskasing facility purchases its load from the Independent Electricity System Operator (**IESO**) and draws its load directly from Hydro One Network Inc.'s transmission system.

RYAM currently holds a Wholesaler Licence (EW-2019-0267) and a Generation Licence (EG-2003-0189) for the Load Facilities. Per guidance from Board staff, GreenFirst is applying for a single Generation Licence, which we understand will allow GreenFirst to operate the generator at the Chapleau facility and purchase electricity from the IESO at both Load Facilities. It is our understanding that RYAM will concurrently file requests to have their current licences cancelled.

GreenFirst intends to maintain operations at the Load Facilities consistent with its operating standards to date, and the address, size, and facility particulars will not change. GreenFirst will be responsible for meeting all legal and regulatory requirements within the Board's jurisdiction. However, GreenFirst is also providing a parental guarantee in the Board-prescribed and approved form by its parent company GreenFirst Forest Products Inc. (attached as Appendix-C). Audited financial statements for GreenFirst Forest Products Inc. are attached as Appendix-D).

CAN\_DMS: \140430085

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OEB  
July 19, 2021



No other parties will be adversely affected in a material way by the outcome of this proceeding. Therefore, GreenFirst, as applicant, requests that this application proceed without a hearing pursuant to section 21(4)(b) of the Act and hereby consents to same.

As noted above, the Transaction is expected to close on July 31, 2021. As such GreenFirst respectfully requests that the Board dispose of this matter prior to this date.

If you have any questions in respect of the above, please contact us.

Yours very truly,

A handwritten signature in black ink, appearing to read "J. Teskey".

Jennifer Teskey  
Partner

JT/tm



## Application for an Electricity Generation Licence

### Application Instructions

#### 1. Purpose of this Form

Use this form to apply, under section 60 of the *Ontario Energy Board Act, 1998* (OEB Act), for an “electricity generation” licence. An electricity generation licence issued by the Ontario Energy Board (OEB) enables the licensee to generate electricity or provide ancillary services for sale through the IESO-administered markets or directly to another person; purchase electricity or ancillary services in the IESO-administered markets or directly from a generator; and, sell electricity or ancillary services through the IESO-administered markets or directly to another person, other than a consumer.

Feed-in Tariff program generators should use the licence application form specified for Feed-in Tariff program generators, which can be found on the "Apply for a Licence" page of the "Industry" section of the OEB's website at [www.oeb.ca](http://www.oeb.ca).

#### 2. Completion Instructions

This form is in writeable PDF and can be completed electronically. If necessary, **responses may be continued on additional pages**. The applicant is encouraged to complete the form electronically, save the completed form and file it, along with any attachments, by e-mail to: [boardsec@oeb.ca](mailto:boardsec@oeb.ca).

**THE APPLICANT MUST ALSO SEND TWO PAPER COPIES OF THE COMPLETED AND SIGNED APPLICATION FORM, ALONG WITH TWO PAPER COPIES OF ANY ATTACHMENTS AND THE APPROPRIATE APPLICATION FEE TO:**

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

The OEB uses the following three main criteria to assess applicants for an electricity generation licence:

- The applicant's ability to be a financially viable entity with respect to the activities the applicant intends to undertake;
- The applicant's technical capability and experience with respect to the activities the applicant intends to undertake; and
- The applicant and its key individuals' past business history and conduct such that they afford reasonable grounds for belief that the applicant will carry on business in accordance with the law, integrity and honesty.

The information requested in this application form relates to the above noted criteria. The applicant must complete and file the information requested in this application form. The OEB may require information that is additional to the information filed in this application form. Also, filing of a completed application form does not preclude the applicant from filing additional information.

Any questions regarding the completion of this application should be directed to the OEB at [IndustryRelations@oeb.ca](mailto:IndustryRelations@oeb.ca).

### 3. Application and Registration Fees

A non-refundable application fee is required to process this application. Please enclose a cheque or money order made payable to the **ONTARIO ENERGY BOARD**. If a licence is issued, the licensee may be required to pay an annual registration fee. The amounts of the application fee and the annual registration fee are indicated on the “Apply for a Licence” page of the “Industry” section of the OEB's website at [www.oeb.ca](http://www.oeb.ca).

### 4. Confidentiality

Information filed as part of or in support of sections 12 to 16 of this application will be treated as confidential. All other information filed as part of or in support of this application will be placed on the public record. Where the applicant objects to public disclosure of information filed as part of or in support of sections other than sections 12 to 16, the applicant must follow the procedure set out in the OEB's Practice Direction on Confidential Filings.

### 5. Important Information

Applicants should consider the timelines required to process applications to avoid submitting applications too early or too late. Submitting applications too early without reasonable certainty of the proposed licensed activities will impede regulatory efficiency while submitting applications too late will leave the applicant to bear the risk of delayed commencement of licensed activities. Processing timelines are indicated on the “[Apply for a Licence](#)” page of the OEB's website at [www.oeb.ca](http://www.oeb.ca). If submitted incomplete, there may be a delay in processing the application.

Applicants must make a copy of the non-confidential sections of the application available to any person who requests a copy of the application.

Ontario Energy  
Board  
P.O. Box 2319  
2300 Yonge Street  
27th Floor  
Toronto ON M4P 1E4  
Telephone: 1-888-632-6273  
Facsimile: (416) 440-7656

Commission de l'énergie  
l'Ontario  
C.P. 2319  
2300, rue Yonge  
27e étage  
Toronto ON M4P 1E4  
Téléphone: 1-888-632-6273  
Télécopieur: (416) 440-7656



## Application for an Electricity Generation Licence

For Office Use Only	
Application Number	EB-
Date Received	

### 1. The Applicant

Legal Name of the Applicant : GreenFirst Forest Products (QC) Inc. (formerly 9437-6001 Quebec Inc.)

Business Classification:

☐ Sole Proprietor

☐ Partnership

☒ Corporation

☐ Other (describe) \_\_\_\_\_

Date of formation or incorporation: March 16, 2021

Place of formation or incorporation:

Province/State Quebec

Country Canada

If the applicant is an individual, the applicant must be at least 18 years old. If the applicant is an individual, is he or she at least 18 years old?

☐ Yes

☐ No

☒ Not Applicable - not an individual

Head Office or Business Address of Applicant

1800-510 West Georgia Street

City	Province/State	Country	Postal/Zip Code
<u>Vancouver</u>	<u>British Columbia</u>	<u>Canada</u>	<u>V6B0M3</u>

Phone Number	Toll Free (if available)	E-mail Address
<u></u>	<u>N/A</u>	<u></u>

Website Address http://gffp.ca/

## 2. Application Type

☒ New

☐ Renewal, provide the licence number and expiry date of the current licence.

Licence Number \_\_\_\_\_ Expiry Date \_\_\_\_\_

## 3. Licence Primary Contact

The licensee shall designate a person who will act as primary contact with the OEB on matters related to the licence.

Mr. <input checked="" type="radio"/>	Mrs. <input type="radio"/>	Last Name	First Name	Initial
Miss <input type="radio"/>	Ms. <input type="radio"/>	Liggett	Michael	
Other <input type="radio"/> _____		Title/Position		
		Chief Financial Officer		
		Company Name		
		GreenFirst Forest Products (QC) Inc.		

Licence Primary Contact Address:

510 W Georgia St Suite 1800

City	Province/State	Country	Postal/Zip Code
Vancouver	British Columbia	Canada	V6B0M3

Phone Number	Toll Free (if available)	E-mail Address
604-657-3882	n/a	mliggett@ogeecorp.com

## 4. Application Primary Contact

☐ Indicate if same as above. Proceed to section 5.

The primary contact for the licence application may be a person within the applicant's organization other than the licence primary contact noted above. An applicant may also choose to designate a consultant, lawyer, etc. to be the primary contact for the licence application. The OEB will communicate with this person during the course of the application review process but with the licence primary contact after a licence is issued.

Mr. <input type="radio"/>	Mrs. <input type="radio"/>	Last Name	First Name	Initial
Miss <input type="radio"/>	Ms. <input checked="" type="radio"/>	Teskey	Jennifer	
Other <input type="radio"/> _____		Title/Position		
		Lawyer		
		Company Name		
		Norton Rose Fulbright Canada LLP		

Application Primary Contact Address:

222 Bay St, Suite 3000

City

Toronto

Province/State

Ontario

Country

Canada

Postal/Zip Code

M5K 1E7

Phone Number

416-216-2303

Toll Free (if available)

E-mail Address

jennifer.teskey@nortonrosefulbright.com

## 5. Trade Names

The electricity generation licence authorizes the licensee to conduct business using the name under which the licence is held (i.e. the applicant's legal name). It also provides for the use of trade names by the licensee.

Does the applicant intend to use trade names?

☐ Yes, provide a list of trade names the applicant intends to use in the space provided below.

☒ No, proceed to section 6.


## 6. Applicant's Licensing Status and History

(a) Has the applicant, an affiliate of the applicant, or an associated entity (e.g., a partnership or limited partnership), ever been licensed by the OEB? (The *Business Corporations Act* definition for affiliate can be found at [www.e-laws.gov.on.ca](http://www.e-laws.gov.on.ca))

☐ Yes, provide details of current and expired licences in the table below.

☒ No, proceed to 6(b).

Licensee Name	Relation to the Applicant (e.g., applicant itself, affiliate, partner...etc.)	Licence Number

(b) Does the applicant, an affiliate of the applicant, or an associated entity have any other application(s) before the OEB?

☐ Yes, provide details in the table below.

☒ No, proceed to 6(c).

Applicant Name	Relationship to this Applicant	Type of Application	OEB File Number

(c) Has the applicant, an affiliate of the applicant, or an associated entity ever undertaken energy sector activity in any other jurisdiction within North America?

☐ Yes, provide details in the table below.

☒ No

Company Name	Relation to the Applicant	Jurisdiction	Business Activity	Name of Licensing Body and Licence/Registration No. (if applicable)

## 7. Key Individuals

In the table below, identify all key individuals associated with the applicant's business. Key individuals include sole proprietors, each partner, all officers and directors of a corporation, all shareholders with 10% or more of the equity shares of a corporation, managers, and any other individuals with a beneficial interest.

Name of Key Individual	Title/Position within Applicant's Business (or identify company if not the Applicant's Business)
Larry Swets	Director and President
Michael Liggett	Chief Financial Officer



## 8. Intended Services and Markets

- (a) The OEB Act defines “ancillary services” as services necessary to maintain the reliability of the IESO-controlled grid, including frequency control, voltage control, reactive power, and operating reserve services. Does the applicant intend to sell electricity or ancillary services into the IESO administered market?

☒ Yes☐ No

- (b) Does the applicant intend to settle with an electricity distributor for the electricity injected into the distribution system in accordance with the retail settlement system?

☒ Yes, please identify the electricity distributor Hydro One Network Inc.

☐ No

- (c) Does the applicant intend to sell electricity to another person?

☐ Yes☒ No

If yes, is this person a consumer (i.e., a person who uses, for the person's own consumption, electricity that the person did not generate)?

☐ Yes. The applicant may require a retailer licence. The application form can be found at [www.oeb.ca](http://www.oeb.ca)

☐ No

## 9. Facility Description

Is the applicant applying to be licensed for more than one facility?

☒ Yes, please make a copy of sections 9, 10 and 11 for each facility and provide information for each facility

☐ No

### Generation Type

☐ Diesel      ☐ Natural Gas      ☐ Water      ☐ Wind

☒ Other, please specify Biomass (wood burning steam)

Installed Capacity 7.1 MW

Number of Units

If the applicant is selling ancillary services, please describe:

Facility name: Chapleau Sawmill

Facility Address: 1 Planer Road P.O. Box 1417, Chapleau, Ontario, P0M 1K0

## Licence Responsibility/Qualification Sought

☒ Owner and Operator

☐ Owner Only. Please identify operator \_\_\_\_\_

☐ Operator Only. Please identify owner \_\_\_\_\_

If the applicant is applying for only one of the two qualifications, please provide information on the status of the other qualification. The information should include confirmation as to whether or not the person or entity seeking the other qualification is licensed; if licensed, please provide the licence number and, if not, indicate when an application for the other qualification will be filed with the OEB.

N/A

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## 10. Facility History and Status

Is the facility in commercial service?

☒ Yes, proceed to section 10(a)

☐ No, proceed to section 10(b) or 10(c) as applicable.

(a) Existing Facility in Commercial Service

When did this facility achieve commercial operation? This date is unknown as it predates the acquisition by the previous licensee.

Is the applicant the original owner and operator?

☐ Yes

☒ No, identify previous owner and operator: Rayonier A.M. Canada G.P.

(b) New Facility

Has facility construction commenced?

☐ Yes

☒ No

What is the expected commercial in service date? \_\_\_\_\_

(c) Existing Facility **NOT** in Commercial Service

What is the expected commercial in service date? \_\_\_\_\_

Please provide a list of all other regulatory approvals required (e.g. environmental, municipal, etc.). Please identify the status of each approval.

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## 11. Connection

What is the voltage at the perimeter of the applicant's property from the output of the generation facility?

- ☒ 50 kV or less, proceed to section 11(a)  
☐ greater than 50 kV, proceed to section 11(b)

- (a) The OEB Act defines a "distribution system" as a system for distributing electricity, and includes any structures, equipment or other things used for that purpose. "Distribute", with respect to electricity, means to convey electricity at voltages of 50 kV or less.

Describe the existing or future distribution system from the output of the generation facility to the connection point with the electricity distributor or to the connection point with the transmission system (e.g., length of line, transformers, etc.).

The Chapleau Facility is connected to Hydro One Network Inc's Chapleau DS F3 circuit at 25 kV. Disconnection is via a Customer owned 3 phase disconnect switch 1836-L located near the Point of Common Coupling.

Does (or will) the applicant own and/or operate the distribution system?

- ☐ Yes  
☒ No, identify the owner and/or operator of the distribution system Hydro One Network Inc.

If yes, does the applicant own and/or operate the distribution system only for the purpose of conveying electricity from the generation facility to the IESO-controlled grid?

- ☐ Yes  
☐ No, describe the purpose of the distribution system \_\_\_\_\_

If the answer to the question above is no, the applicant may require a distribution licence. The application form can be found at [www.oeb.ca](http://www.oeb.ca).

Does (or will) the distribution system connect the generation facility to an electricity distributor?

- ☐ Yes, identify the electricity distributor \_\_\_\_\_  
☐ No, proceed to section 11(b)

- (b) The OEB Act defines a "transmission system" as a system for transmitting electricity, and includes any structures, equipment or other things used for that purpose. "Transmit", with respect to electricity, means to convey electricity at voltages of more than 50 kV.

Describe the existing or future transmission system from the output of the generation facility or applicant's distribution system to the connection point with the transmission network (e.g., length of line, transformers, etc.).

Does (or will) the applicant own and/or operate the transmission system?

☐ Yes

☒ No, identify the owner and/or operator of the transmission system \_\_\_\_\_

If yes, does the applicant own and/or operate the transmission system only for the purpose of conveying electricity from the generation facility to the IESO-controlled grid?

☐ Yes

☒ No, describe the purpose of the transmission system \_\_\_\_\_

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If the answer to the question above is no, the applicant may require a transmission licence. The application form can be found at [www.oeb.ca](http://www.oeb.ca).

## 9. Facility Description

Is the applicant applying to be licensed for more than one facility?

- ☒ Yes, please make a copy of sections 9, 10 and 11 for each facility and provide information for each facility  
☐ No

Generation Type

- ☐ Diesel      ☐ Natural Gas      ☐ Water      ☐ Wind  
☒ Other, please specify N/A This is a load facility.

Installed Capacity \_\_\_\_\_ MW

Number of Units \_\_\_\_\_

If the applicant is selling ancillary services, please describe: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Facility name: Kapuskasing Sawmill

Facility Address: 1 Government Road P.O. Box 100, Kapuskasing, ON P5N 2Y2

\_\_\_\_\_

## Licence Responsibility/Qualification Sought

- ☒ Owner and Operator
- ☐ Owner Only. Please identify operator \_\_\_\_\_
- ☐ Operator Only. Please identify owner \_\_\_\_\_

If the applicant is applying for only one of the two qualifications, please provide information on the status of the other qualification. The information should include confirmation as to whether or not the person or entity seeking the other qualification is licensed; if licensed, please provide the licence number and, if not, indicate when an application for the other qualification will be filed with the OEB.

N/A

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## 10. Facility History and Status

Is the facility in commercial service?

- ☒ Yes, proceed to section 10(a)
- ☐ No, proceed to section 10(b) or 10(c) as applicable.

### (a) Existing Facility in Commercial Service

When did this facility achieve commercial operation? This date is unknown as it predates the acquisition by the previous licensee.

Is the applicant the original owner and operator?

- ☐ Yes
- ☒ No, identify previous owner and operator: Rayonier A.M. Canada G.P.

### (b) New Facility

Has facility construction commenced?

- ☐ Yes
- ☒ No

What is the expected commercial in service date? \_\_\_\_\_

### (c) Existing Facility **NOT** in Commercial Service

What is the expected commercial in service date? \_\_\_\_\_

Please provide a list of all other regulatory approvals required (e.g. environmental, municipal, etc.). Please identify the status of each approval.

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## 11. Connection

What is the voltage at the perimeter of the applicant's property from the output of the generation facility?

- ☐ 50 kV or less, proceed to section 11(a)  
☒ greater than 50 kV, proceed to section 11(b)

- (a) The OEB Act defines a "distribution system" as a system for distributing electricity, and includes any structures, equipment or other things used for that purpose. "Distribute", with respect to electricity, means to convey electricity at voltages of 50 kV or less.

Describe the existing or future distribution system from the output of the generation facility to the connection point with the electricity distributor or to the connection point with the transmission system (e.g., length of line, transformers, etc.).

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Does (or will) the applicant own and/or operate the distribution system?

- ☐ Yes  
☐ No, identify the owner and/or operator of the distribution system \_\_\_\_\_

If yes, does the applicant own and/or operate the distribution system only for the purpose of conveying electricity from the generation facility to the IESO-controlled grid?

- ☐ Yes  
☐ No, describe the purpose of the distribution system \_\_\_\_\_
- 

If the answer to the question above is no, the applicant may require a distribution licence. The application form can be found at [www.oeb.ca](http://www.oeb.ca).

Does (or will) the distribution system connect the generation facility to an electricity distributor?

- ☐ Yes, identify the electricity distributor \_\_\_\_\_  
☐ No, proceed to section 11(b)

- (b) The OEB Act defines a "transmission system" as a system for transmitting electricity, and includes any structures, equipment or other things used for that purpose. "Transmit", with respect to electricity, means to convey electricity at voltages of more than 50 kV.

Describe the existing or future transmission system from the output of the generation facility or applicant's distribution system to the connection point with the transmission network (e.g., length of line, transformers, etc.).

There is no generation facility at this location. It is a load facility that purchases electricity from the IESO - administered markets. The facility is connected directly to Hydro One Network Inc's transmission system.

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Does (or will) the applicant own and/or operate the transmission system?

☐ Yes

☒ No, identify the owner and/or operator of the transmission system Hydro One Network Inc.

If yes, does the applicant own and/or operate the transmission system only for the purpose of conveying electricity from the generation facility to the IESO-controlled grid?

☐ Yes

☒ No, describe the purpose of the transmission system \_\_\_\_\_

\_\_\_\_\_  
If the answer to the question above is no, the applicant may require a transmission licence. The application form can be found at [www.oeb.ca](http://www.oeb.ca).