

August 30, 2023

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

Dear Mr. John Pickernell:

Re: Application for Electricity Retailer Licence - Board File Number EB-2023-0191

Thank you for your letter of August 3, 2023 regarding our application for an electricity retailer license. With regard to the specific questions in your letter:

1. Due to an inadvertent, administrative error our retailer licence ER-2017-0098 (the "Licence") expired on May 17, 2022. Although we received an invoice from the OEB by email on May 18, 2022 (#2223ER035) for "2022/23 Fiscal Year" and paid our fee promptly, it was when we looked for our next invoice in May 2023 that we uncovered our administrative error in failing to renew the Licence before its expiry. Upon realizing this, we immediately contacted OEB staff by phone in May 2023 and the verbal instructions we received were to submit an application for renewal of the Licence on this basis. The current application is intended to correct for this inadvertent expiry. Should it be required to proceed on another basis please advise.
2. GC Project LP provides customer-sited behind-the-meter load displacement (for emergency back up and peak power supply) to a single large Class A electricity consumer (a major national retailer), under detailed terms set out in a specifically-negotiated, site-specific, supply agreement directly with that electricity consumer. No electricity is provided or sold by GC Project LP via the grid or to any other third party. These details were included as specific terms and conditions of the expired Licence and we would propose they be included again in the renewal (as there has been no change in this underlying, single-purpose project function of the Licence). This contract between GC Project LP and its sole commercial counterparty is in good standing, with no disputes and the counterparty provides meter data and settles with GC Project LP on a monthly basis for electricity generated by GC Project LP. GC Project LP is also a licenced generator under OEB Generator Licence EG-2017-0099, which expires in 2037 (consistent with the expected useful life of its generating equipment and the tenor of its commercial agreement for on-site generation with its single contract counterparty).
3. Since May 2023, GC Project LP has been seeking to establish compliance with OEB requirements with respect to the Licence on an expedited basis. We have continued at all times to provide our sole counterparty with the on-site generation services (which are critical to its needs for emergency back up and peak power supply), according to our existing supply contract during that period.

We thank you for your consideration of this file, and stand ready to address any further questions or requirements for our renewal application as you direct

Regards,



Clarke D. Herring
Authorized Signatory
GC Project Inc., as general partner
To GC Project LP