

MICHAEL R. BUONAGURO

Barrister and Solicitor

24 HUMBER TRAIL
TORONTO, ONTARIO, M6S 4C1
P: (416) 767-1666
F: (416) 767-1666
EMAIL: mrb@mrb-law.com

March 22, 2016

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Walli,

**RE: Consultation to Develop a Regulatory Framework for Natural Gas
Distributors' Cap and Trade Compliance Plans**

Board File No. EB-2015-0363

We are writing on behalf of the Ontario Greenhouse Vegetable Growers ("OGVG") in regard to the referenced Consultation.

The Ontario greenhouse vegetable sector is a major contributor to the Ontario economy, generating over \$840 million in farm gate receipts and accounting for approximately 10,000 jobs annually. OGVG, as an organization, represents all 211 greenhouse pepper, tomato and cucumber growers in the province. Given the nature of greenhouse production systems, OGVG members are heavily reliant on energy, particularly natural gas. Over one third of greenhouse production costs are energy-related and as such rate increases and pricing adjustments serve to threaten the global competitiveness of the sector.

The Ontario greenhouse sector is growing. In fact, in evidence filed by Union Gas in its 2013 rate case, the greenhouse sector was shown to be the fastest growing sector of Union's business markets exhibiting a doubling of volume between the 2007 Board-approved and the 2013 Forecast volumes. OGVG members' natural gas consumption is important to Union Gas and greenhouse production in general is important to the Ontario economy.

With respect to this particular consultation, OGVG expects that its members may be materially affected by the impacts of the required Cap and Trade Compliance Programs on natural gas distributors, and accordingly would respectfully ask that it be granted

intervenor status.

As a not-for-profit organization, OGVG does not have other funding sources to ensure experienced representation to participate in and assist the Board with these regulatory proceedings. Therefore OGVG would respectfully request a determination of eligibility for cost award in this consultation. OGVG retains professionals who have experience representing intervenor interests and, OGVG respectfully submits, have assisted the Board in previous proceedings in an efficient and responsible manner.

REPRESENTATION

If the intervention requested is granted, OGVG asks that further communications with respect to this matter be sent to the following:

Dr. Justine Taylor
Environmental Projects Specialist
Ontario Greenhouse Vegetable Growers
32 Seneca Road, Leamington, Ontario
N8H 5H7

Phone 519-326-2604

Email: jtaylor@ontariogreenhouse.com

AND

Michael Buonaguro
Counsel, Ontario Greenhouse Vegetable Growers
24 Humber Trail
Toronto, Ontario
M6S 4C1

Phone 416-767-1666

Email: mrb@mrb-law.com

Yours very truly,



Michael R. Buonaguro