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October 25, 2016

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

DELIVERED BY EMAIL

Dear Ms. Walli,

**RE: Board File No. EB-2016-0245, Union Gas Limited, Application for 2017 Rates**

We are writing on behalf of the Ontario Greenhouse Vegetable Growers ("OGVG") in regard to the referenced Application. The Application by Union Gas Limited ("Union Gas"), pursuant to Section 36 of the *Ontario Energy Board Act, 1998*, is for an Order or Orders approving 2017 rates. The resulting rate changes, if approved, impact the members of OGVG.

The Ontario greenhouse vegetable sector is a major contributor to the Ontario economy, generating over \$820 million in farm gate receipts and accounting for approximately 10,000 jobs annually. OGVG, as an organization, represents over 200 greenhouse pepper, tomato and cucumber growers in the province. 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.

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 proceeding. 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.

**ISSUES OF CONCERN**

OGVG understands this application is made pursuant to the Board's approval of Union Gas' multi year incentive rate mechanism in EB-2013-0202, within which OGVG was a registered intervenor. The application has the potential to materially affect the regulated rates that OGVG members pay to Union Gas for regulated services, such that OGVG respectfully requests intervenor status before the Board with respect to the proceeding.

Without limiting the scope of OGVG's interest in the various issues to be determined by the Board as a result of the application, OGVG is particularly interested in following up with respect to the impact of the new unauthorized overrun rate that was approved in the 2016 rate application, as OGVG's members are significant users of Union Gas' interruptible service.

**REPRESENTATION**

If the intervention requested is granted, then 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

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Yours very truly,



Michael R. Buonaguro

CC: Chris Ripley  
Crawford Smith