

# 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](mailto:mrb@mrb-law.com)

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May 28, 2019

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: Post-2020 Natural Gas Demand Side Management Framework Board File  
Number: EB-2019-0003**

We are writing on behalf of the Ontario Greenhouse Vegetable Growers ("OGVG") in regard to the referenced consultation to request intervenor status and cost eligibility.

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. 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, and controlling consumption is a key concern.

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 the amalgamated entity that Union Gas is now a part of, and greenhouse production in general is important to the Ontario economy.

With respect to this particular consultation OGVG's members, as distribution customers, are directly affected by the ongoing DSM efforts by Ontario's gas utilities, both in terms of the results from those efforts and the DSM costs passed on to OGVG's members in distribution rates. In addition, as a participant in proceedings related to the DSM framework under which the gas utilities are currently operating, OGVG has a continuing

interest in the manner in which the gas utilities conduct ratepayer funded DSM activity.

If OGVG is granted intervenor status it intends to participate fully in all aspects of the consultation process.

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:

Nathan Warkentin  
Energy and Environment Analyst  
Ontario Greenhouse Vegetable Growers  
32 Seneca Road, Leamington, Ontario  
N8H 5H7

Phone 519-326-2604

Email: [n.warkentin@ontariogreenhouse.com](mailto:n.warkentin@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](mailto:mrb@mrb-law.com)

If any further information is required please do not hesitate to contact the undersigned.

Yours very truly,



Michael R. Buonaguro