

VIA E-MAIL, COURIER & RESS

June 17, 2013

Ontario Energy Board
Attn: Kirsten Walli, Board Secretary
P.O. Box 2319
27th Floor, 2300 Yonge Street
Toronto ON M4P 1E4

RE: EB-2013-0109 UNION GAS - 2012 ESM and Deferral Account Disposition

REQUEST & SUPPORT

I am writing on behalf of the Ontario Greenhouse Vegetable Growers ("OGVG") in regard to the referenced Notice of Application. The Application requests approval for amending or varying rates under Sections 36 of the Ontario Energy Board Act, 1998. This notice was forwarded to OGVG by Union Gas.

The Ontario greenhouse vegetable sector is a major contributor to the Ontario economy, generating over \$700 million in farmgate receipts and accounting for 12,000 jobs annually. OGVG is the organization representing all 224 greenhouse pepper, tomato and cucumber growers in the province. Given the nature of OGVG's members production systems, the sector is heavily reliant on energy, particularly natural gas. With one third of production costs being energy-related, the growers are very sensitive to pricing adjustments.

The greenhouse industry 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 with more than a doubling of volume between 2007 Board-approved and 2013 Forecast volumes.¹ OGVG members' natural gas consumption is important to Union Gas and its production is important to the Ontario economy.

This is OGVG's first request for intervenor status in a proceeding before the Ontario Energy Board. 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 has retained professionals who have experience representing intervenor interests and, OGVG respectfully submits, have assisted the Board in previous proceedings in an efficient and responsible manner.

¹ EB-2010-0210 Exhibit C1, Tab 2, Page 7, Table 1

ISSUES OF CONCERN

OGVG's members are very concerned about the recent increase in Union Gas rates. This concern was expressed to the Board in a letter copied to Union Gas in April. Union's response to that letter committed to providing a copy of Notices of Application for rate changes that would affect OGVG's members. That commitment was met through forwarding of the subject notice to OGVG by Union on June 7th. OGVG understands that this proceeding and similar proceedings impact the rates that are charged by the natural gas distributor and this is the process to advance its previously stated concerns. We have notified Union Gas of our desire to participate in this proceeding. Accordingly OGVG respectfully requests intervenor status and the opportunity to participate in all facets of the Board's review of the Application.

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
Phone 519-326-2604
Email: jtaylor@ontariogreenhouse.com

AND

Mr. Dwayne R. Quinn
DR QUINN & ASSOCIATES LTD.
130 Muscovey Drive,
Elmira, Ontario N3B 3B7
Phone: (519) 500-1022
Email: drquinn@rogers.com

Mr. Michael Buonaguro
Barrister and Solicitor
24 Humber Trail,
Toronto, Ontario M6S 4C1
Phone: (416) 767-1666
Email: mrb@mrb-law.com

Thank you for your consideration of this request

Respectfully Submitted on Behalf of OGVG,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

c. M. Kitchen - Union Gas

G. Gilvesy - OGVG

J. Taylor - OGVG