

VIA E-MAIL, COURIER & RESS

August 31, 2013

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

RE: EB-2013-0202 UNION GAS - 2014-2018 Incentive Ratemaking Application

REQUEST & SUPPORT

We are 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 and requests an order approving a multi-year incentive rate mechanism ("IRM") to determine rates for the regulated distribution, transmission and storage of gas effective January 1, 2014. The resulting rates have impact on the members of the OGVG.

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, as an organization, represents all 224 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.¹ OGVG members' natural gas consumption is important to Union Gas and greenhouse production in general is important to the Ontario economy.

This is OGVG's second 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 of 2013. Union's response to that letter committed to providing a copy of Notices of Application for rate changes that would affect OGVG's members. OGVG understands that this proceeding and similar proceedings impact the rates that are charged by the natural gas distributor. As OGVG was not represented in the 2013 rates proceeding, OGVG was not a party to the proposed Settlement Agreement. Accordingly OGVG respectfully requests intervenor status and the opportunity to participate in 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 Muscovy 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
M. Buonaguro - MRB Law

G. Gilvesy - OGVG

J. Taylor - OGVG