

VIA E-MAIL, COURIER & RESS

May 30, 2014

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

RE: EB-2014-0145 UNION GAS DEFERRAL ACCOUNT DISPOSITION

REQUEST & SUPPORT

We are writing on behalf of the Ontario Greenhouse Vegetable Growers ("OGVG") in regard to the notice of application from the Ontario Energy Board published May 27, 2014. The Notice outlines Union's request for approval of the disposition of deferral account balances at year end 2013 and disposition in 2014.

The Ontario greenhouse vegetable sector is a major contributor to the Ontario economy, generating over \$782 million in farmgate receipts and accounting for 12,000 jobs annually. OGVG is the organization representing all 218 greenhouse pepper, tomato and cucumber growers in the province. Given the nature of OGVG 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 members' production 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 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

As 2013 was a rebasing year, much of the evidence in the application focuses on Gas Supply, Transport and Storage. These facets have come under considerable scrutiny in the last few years. With the continued changes in the North American supply market, we believe that it is important to ensure an equitable allocation of costs and benefits from the respective accounts as directed by past Board decisions in these areas.

OGVG's members purchase their natural gas through both direct purchase and system supply. Our concern would be that the account balances are allocated and disposed of consistent with past Board decisions. Further, we would seek to assist the Board and our members in understanding the implications of the Gas Supply Memorandum included in the evidence.

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. C. Ripley - Union Gas

G. Gilvesy - OGVG

J. Taylor - OGVG