

VIA E-MAIL, COURIER & RESS

May 30, 2014

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

**RE: EB-2014-0134 Consultation Process for Developing a New DSM Framework**

**REQUEST & SUPPORT**

We are writing on behalf of the Ontario Greenhouse Vegetable Growers ("OGVG") in response to the Board's letter of April 10, 2014. The Letter outlines the Board's intended process of consultation toward the creation of a new DSM Framework for the period of 2015-2020. We apologize to the Board and the respective utilities for the timing of this submission as other circumstances inhibited its submission by the ordered deadline. As the preliminary work is currently being undertaken, we respectfully submit that no party would be prejudiced by the Board's acceptance of our request but express regret for the additional administrative impact.

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.<sup>1</sup> 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.

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<sup>1</sup> EB-2010-0210 Exhibit C1, Tab 2, Page 7, Table 1

**ISSUES OF CONCERN**

DSM programs have evolved over the years with the advancement of technology that has aided implementation and verification. Public policy and opinion have also influenced this evolution. We appreciate the Board's periodic review of the framework to ensure ongoing and improved effectiveness of these ratepayer investments.

As we have come to understand, the evolution in 2012 brought about the allocation of costs to the M5 interruptible rate class. With our absence in the process, the results of this change surprised some of our members. Our members are concerned that we have representation to contribute to and understand better the next evolution and its impact on both interruptible and firm rate classes.

**REPRESENTATION**

If the intervention requested is granted, then OGVG asks that further communications with respect to this matter be sent to the following:

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Environmental Projects Specialist  
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AND

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Thank you for your consideration of this request.

Respectfully Submitted on Behalf of OGVG,



Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

c. G. Gilvesy - OGVG J. Taylor - OGVG