

VIA E-MAIL & COURIER

March 10, 2015

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-2014-0182 - UNION GAS – Burlington-Oakville Pipeline Project**

**REQUEST & SUPPORT**

We are writing on behalf of the Ontario Greenhouse Vegetable Growers ("OGVG") in regard to the referenced Notice of Application. The Application by Union Gas, pursuant to section 90 (1) of the Ontario Energy Board Act, 1998, requests the granting of leave to construct for infrastructure additions and further, pursuant to section 36, an approval of cost recovery for these facilities. The resulting rates impact the members of OGVG.

The Ontario greenhouse vegetable sector is a major contributor to the Ontario economy, generating over \$783 million in farmgate receipts and accounting for 12,000 jobs annually. OGVG, as an organization, represents all 218 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.<sup>1</sup> OGVG members' natural gas consumption is important to Union Gas and greenhouse production in general 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**

OGVG understands that this infrastructure addition is prompted by evolution of the North American natural gas market and the Settlement Agreement between TCPL and the Eastern LDC's. While OGVG respects the need for rational, economic development of the market and resulting infrastructure, we want to understand better the evaluation of alternatives and escalating costs. Accordingly OGVG respectfully requests intervenor status and the opportunity to participate in all aspects of the Board's review of the Application.

We apologize for the timing of our request for intervention and accept the record and timelines ordered in Procedural Order No. 1 and the proposed issues list.

**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](mailto:jtaylor@ontariogreenhouse.com)

AND

Mr. Dwayne R. Quinn  
DR QUINN & ASSOCIATES LTD.  
130 Muscovy Drive,  
Elmira, Ontario N3B 3P7  
Phone: (519) 500-1022  
Email: [drquinn@rogers.com](mailto:drquinn@rogers.com)

Thank you for your consideration of this request

Respectfully Submitted on Behalf of OGVG,



Dwayne R. Quinn  
Principal  
DR QUINN & ASSOCIATES LTD.

c. V. Innes - Union Gas

J. Taylor - OGVG