

VIA E-MAIL & COURIER

May 11, 2015

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

RE: EB-2015-0010 - UNION GAS 2014 DEFERRAL ACCOUNT DISPOSITIONS

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 36(1) of the *Ontario Energy Board Act, 1998*, for an Order or Orders approving the 2015 to 2020 Demand Side Management Plan proposes extensive DSM plans for the near term. The resulting programs and rates impact the members of OGVG.

The Ontario greenhouse vegetable sector is a major contributor to the Ontario economy, generating over \$840 million in farm gate receipts and accounting for approximately 14,000 jobs annually. OGVG, as an organization, represents all 211 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.

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 is concerned with the appropriate allocation and disposition of the deferral account balances including the Earnings Sharing Mechanism determination. In addition, we are interested in understanding Union's Incremental Transportation Contracting Analysis and Gas Supply Memorandum and the effect on our members and the market. Given our experience with matters arising from recent Deferral Account proceedings, we believe that an oral hearing preceded by interrogatories and a settlement conference would be an effective process to determine these issues.

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

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

J. Taylor - OGVG