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September 28, 2015

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Walli,

RE: Board File No. EB-2015-0116, Union Gas Limited, Application for 2016 Rates

We are writing on behalf of the Ontario Greenhouse Vegetable Growers ("OGVG") in regard to the referenced Application. The Application by Union Gas Limited ("Union Gas"), pursuant to Section 36 of the *Ontario Energy Board Act, 1998*, is for an Order or Orders approving 2016 rates. The resulting rate changes, if approved, impact the members of OGVG. Accordingly OGVG respectfully requests intervenor status in this proceeding.

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 10,000 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, as was evidenced by Union Gas in its 2013 rate case wherein the sector's natural gas consumption was seen to have doubled between the 2007 Board-approved and the 2013 Forecast volumes. With a consistent track record of growth, 6.1% annually for the past 20 years, this sector and its related natural gas consumption are both expected to continue to expand into the future.

As a not-for-profit organization, OGVG does not have access to additional 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 retains professionals who have experience representing intervenor interests and, OGVG respectfully submits, have assisted the Board in previous proceedings in an efficient and responsible manner.

ISSUES OF CONCERN

OGVG understands this application is made pursuant to the Board's approval of Union Gas' multi year incentive rate mechanism in EB-2013-0202, within which OGVG was a registered intervenor. The application has the potential to materially affect the regulated rates that OGVG members pay to Union Gas for regulated services, such that OGVG respectfully requests intervenor status before the Board with respect to the proceeding.

Without limiting the scope of OGVG's interest in the various issues to be determined by the Board as a result of the application, OGVG would like to highlight its concern with respect to the specific proposal by Union Gas to introduce a new Unauthorized Overrun Non-Compliance rate into its Rate Schedule, a proposal which, if accepted, could materially affect OGVG members.

OGVG respectfully submits that an oral hearing is warranted for the determination of the issues raised in this application, particularly with respect to issues, such as the proposed new Unauthorized Overrun Non-Compliance rate, which do not follow directly from the Board's decision in EB-2013-0202.

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
Energy and Environment Coordinator
Ontario Greenhouse Vegetable Growers
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AND

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Yours very truly,



Michael R. Buonaguro

CC: Chris Ripley
Crawford Smith