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May 24, 2017

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: EB-2017-0091 Union Gas Limited: Application for Approval to dispose of Amounts recorded in certain 2016 Deferral Accounts and for approval of its Earnings Sharing Calculation

We are writing on behalf of the Ontario Greenhouse Vegetable Growers ("OGVG") in regard to the referenced Application. We apologize for the late filing of this intervention request, it was through inadvertence. We have reviewed the public record of the proceeding and it appears to OGVG that no steps beyond the issuance of the Notice of Application have occurred such that we believe that allowing OGVG to intervene at this stage will not adversely impact the proceeding. Accordingly we respectfully request that the Board accept out intervention request at this time.

The Ontario greenhouse vegetable sector is a major contributor to the Ontario economy, generating over \$820 million in farm gate receipts and accounting for approximately 10,000 jobs annually. OGVG, as an organization, represents over 200 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. OGVG members' natural gas consumption is important to Union Gas and greenhouse production in general is important to the Ontario economy.

With respect to this particular application, OGVG's members will be affected by the requested relief and continue to have an interest in the proper administration and calculation of amounts within Union Gas' deferral and variance accounts, as well as the proper accounting of Union Gas' claimed earnings sharing calculation (including when, as in this application, Union is applying on the basis that no earnings sharing was achieved for the subject year).

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 consultation. 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.

REPRESENTATION

If the intervention requested is granted, 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

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Counsel, Ontario Greenhouse Vegetable Growers
24 Humber Trail
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If any further information is required please do not hesitate to contact the undersigned.

Yours very truly,



Michael R. Buonaguro