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December 15, 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-2017-0307 – Enbridge Gas Distribution Inc. and Union Gas Limited –
Rate Setting Mechanism**

We are writing on behalf of the Ontario Greenhouse Vegetable Growers ("OGVG") in regard to the referenced Application.

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, if this application is approved, the amalgamated entity, 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, insofar as OGVG's members will become customers of the amalgamated entity whose rates will be determined, if the requested relief in this and the companion Amalgamation Application are both granted, for as long as the next 10 years in accordance with the proposed rate setting mechanism. Accordingly it is of critical

importance to OGVG's members that the proposed rate setting mechanism be thoroughly vetted by the OEB to ensure that the proposal appropriately protects the interests of consumers such as those represented by OGVG. OGVG notes that it is equally interested in the companion Amalgamation Application EB-2017-0306, and intends to seek intervenor status in that proceeding as well.

If OGVG is granted intervenor status it intends to participate fully in all aspects of the application process, including but not limited to the preparation of interrogatories, participation in any settlement conference and/or oral hearing, and in the submission of argument.

With respect to a preference as between an oral or written hearing, OGVG respectfully submits that it is premature to determine which is appropriate in the circumstances. OGVG would respectfully suggest that such a determination is more appropriately made subsequent to a discovery process, i.e. the filing of responses to interrogatories.

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:

Nathan Warkentin
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AND

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If any further information is required please do not hesitate to contact the undersigned.

Yours very truly,



Michael R. Buonaguro