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April 30, 2018

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

DELIVERED BY EMAIL

Dear Ms. Walli,

**RE: EB-2017-0306 Enbridge Gas Distribution Inc. and Union Gas Limited -  
Application for Amalgamation-Issues List Submissions-OGVG**

These are the submissions on behalf of the Ontario Vegetable Greenhouse Growers (“OGVG”) in response to the Board’s request that intervenors provide their “initial positions” with respect to several questions prior to the commencement of the oral hearing in this proceeding. On the understanding that these “initial positions” are completely without prejudice with respect to OGVG’s final positions following the actual hearing of this matter, we provide below what we hope the Board will accept are adequate responses under the circumstances:

1. Do you plan on supporting approval of the merger?

OGVG has yet to identify any factors that it believes would require the Board to entirely withhold approval of the merger; to date, and pending the actual hearing of the matter, OGVG expects that it is possible to support approval of the merger, and that any concerns with the merger, it would seem, can be dealt with by either attaching conditions to the merger and/or by constructing an appropriate ratesetting mechanism for the consolidated entity prior to an appropriately deferred rebasing.

2. If you plan to support the merger what, if any, conditions of approval will you propose?

OGVG has not, yet, identified anything that would be considered as a “condition of approval”, such that failure to adhere to such a condition would obviate the Board’s approval. At present OGVG expects that concerns about protecting the interest of ratepayers can be allayed through the use of an appropriate ratesetting mechanism.

3. Do you support the 10-year deferred rebasing period?

OGVG expects that some period of deferred rebasing is appropriate; OGVG believes that the proposed 10 year period is, under the circumstances, arbitrary, and that some shorter period of deferred rebasing may be more appropriate. How much shorter, if at all, OGVG would suggest, likely depends on the ratesetting framework that the consolidated entity will experience prior to rebasing.

4. Are there elements of the proposed ratesetting framework that you oppose?

OGVG is concerned about singling out elements of the proposed ratesetting framework that it necessarily “opposes”; whether a particular element of a proposed ratesetting framework is appropriate or necessary depends on how that element fits in with the rest of the framework.

5. Are there elements missing from the proposed ratesetting framework?

As above, OGVG is concerned about singling out elements of the proposed ratesetting framework that are necessarily “missing”; whether a particular element of a proposed ratesetting framework is appropriate or necessary depends on how that element fits in with the rest of the framework.

Yours very truly,



Michael R. Buonaguro