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July 16, 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-2018-0105 Union Gas Limited: Application for approval to dispose of amounts recorded in certain 2017 Deferral Accounts and for approval of its 2017 Earnings Sharing Calculation**

We are writing on behalf of the Ontario Greenhouse Vegetable Growers ("OGVG") in regard to the referenced Application. We respectfully requests that the Board accept OGVG as an intervenor in the 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 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:

Nathan Warkentin  
Energy and Environment Analyst  
Ontario Greenhouse Vegetable Growers  
32 Seneca Road, Leamington, Ontario  
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Phone 519-326-2604

Email: [n.warkentin@ontariogreenhouse.com](mailto:n.warkentin@ontariogreenhouse.com)

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