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January 17, 2019

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-2018-0300 - 2016 DSM Deferrals-Union Gas**

We are writing on behalf of the Ontario Greenhouse Vegetable Growers ("OGVG") in regard to the referenced application. We ask that the Board accept this late request for intervention. The lateness of the intervention was through inadvertence; it is our understanding that no substantive steps with respect to the proceeding have been taken such that OGVG's intervention at this stage of the process will not adversely affect the process.

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, as customers of Union Gas are directly affected by the requested disposition of deferral accounts related to Union

Gas' DSM activity in 2016, and have a material interest in the appropriateness and accuracy of the requested relief. In addition, as a participant in proceedings related to the DSM framework under which Union Gas is currently operating, OGVG's members have a continuing interest in the manner in which Union conducts ratepayer funded DSM activity.

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  
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