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February 5, 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

Dear Ms. Walli,

**DELIVERED BY EMAIL** 

## **RE:** EB-2019-0305 Enbridge Gas Inc. Application for natural gas rate increases effective January 1, 2019

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 Limited 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 the proposed natural gas related rates in accordance with the Board approved rate setting framework, particularly within the Union Gas rate zones, as well as a direct interest in other relief requested by Enbridge Gas Inc. in its application including

but not limited to Incremental Capital Module related funding.

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 N8H 5H7

Phone 519-326-2604

Email: n.warkentin@ontariogreenhouse.com

**AND** 

Michael Buonaguro Counsel, Ontario Greenhouse Vegetable Growers 24 Humber Trail Toronto, Ontario M6S 4C1

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

Yours very truly,

Michael R. Buonaguro