

February 10, 2020

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4
Attention: Board Secretary
Submitted via: Email and Courier

Re: Letter of Comment on EB-2019-0159 Procedural Order No. 1

To whom it may concern:

The Ontario Greenhouse Vegetable Growers (OGVG) represents approximately 200 farmers responsible for over 3,200 acres of fresh, nutritious, greenhouse tomatoes, peppers and cucumbers across the province. With farmgate sales of \$950 million in 2018, support for over 13,000 jobs, a contribution of \$1.8 billion to the economy and a consistent track record of growth, the sector is a valuable economic driver for the province. Over the past five years alone the sector has grown by 675 acres. At \$1 to \$1.5 million per acre, this investment is on par with a new auto assembly plant. The sector is poised for growth and over the next five years we estimate the sector could expand by 900 acres, resulting in over \$1B in direct construction investment, an additional annual contribution of over \$520 million to the economy, and the creation of over 3,800 new jobs.

In reviewing the aforementioned procedural order, we are concerned that the proposal to consider upstream and downstream greenhouse gas (GHG) emissions impacts will have unintended consequences that will negatively impact economic growth. We believe that consideration of such impacts without also considering the additional societal benefits afforded by the project will ultimately stifle development and in the case of our sector, the production of fresh, local food. Natural gas is a key crop input for greenhouse farms. Not only does it provide heat to keep the crop growing through the winter months in our northern climates, but the majority of greenhouse farmers capture carbon dioxide off their boiler stacks and feed it to the crop during periods of high growth. Without this addition of carbon dioxide, greenhouse crops would cease to achieve the high level of productivity required to remain competitive. While we understand the intent behind the proposal, we believe there are existing mechanisms to promote positive behaviors with respect to limiting GHG emissions such as the Federal Carbon Pricing Program and Clean Fuel standards, and provincial level energy efficiency incentive programs. Looking forward, even if Ontario were to be excluded from the Federal Carbon Pricing Program, the establishment of carbon pricing mechanism would fall under the jurisdiction of the Ontario Ministry of Environment, Conservation and Parks (MECP), and not the Ontario Energy Board. The use of this forum to assess GHG impact is out of scope and will only serve to increase the length and complexity of this and potentially future hearings. Given the Ontario government's focus on Red Tape Reduction and positioning Ontario as Open for Business, we believe this proposal would be counterproductive to that outcome.

We thank you for the opportunity to comment on this matter.

Sincerely,



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