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June 8, 2020

Ms. Christine Long
Registrar and Board Secretary
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Long,

**RE: EB-2020-0094-Enbridge Gas Inc.
Harmonized System Expansion Surcharge, Temporary Connection
Surcharge and Hourly Allocation Factor**

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 (now part of Enbridge 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 Enbridge Gas and greenhouse production in general is important to the Ontario economy.

With respect to the noted application, OGVG's members have a direct and material interest in Enbridge Gas' proposals, particularly the proposal for the use of an Hourly Allocation Factor. OGVG's members, as Union Gas customers, have in the past been subject to a form of Hourly Allocation Factor as part of Union Gas' allocation of cost responsibility for development projects, and OGVG would like to participate in this

proceeding in order to help ensure that any such mechanism used by Enbridge Gas going forward is constructed and applied appropriately.

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:

Fereshteh Arab
Energy and Environment Analyst
Ontario Greenhouse Vegetable Growers^[1]_{SEP}
32 Seneca Road, Leamington, Ontario
N8H 5H7

Phone 519-326-2604

Email: f.arab@ontariogreenhouse.com

AND

Michael Buonaguro
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24 Humber Trail
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If any further information is required please do not hesitate to contact the undersigned.

Yours very truly,



Michael R. Buonaguro