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November 11, 2020

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

DELIVERED BY EMAIL

Dear Ms. Long,

RE: EB-2020-0181 Enbridge Gas Inc. Application for natural gas rate increases effective January 1, 2021-Phase 2

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 notes that it is phase 2 of EGI's bifurcated application for rates effective January 1, 2021, and that OGVG was granted intervenor status in phase 1. It appears to OGVG that phase 2 is specifically focused on EGI's Incremental Capital Module ("ICM") requests, with the bulk of the rate impacts from those requests manifesting within EGI's Union South rate zone, the rate zone within

which the bulk of OGVG's members reside. Accordingly, OGVG respectfully submits that its members have a material interest in the proceeding, and as such asks that it be granted intervenor status.

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 regulatory proceedings. Therefore, OGVG would respectfully request a determination of eligibility for cost award in this proceeding. 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:

Dr. Justine Taylor
Science & Government Relations Manager
Ontario Greenhouse Vegetable Growers
32 Seneca Road, Leamington, Ontario
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Phone 519-326-2604

Email: jtaylor@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