## MICHAEL R. BUONAGURO

**Barrister and Solicitor** 

June 10, 2021

Registrar

## DELIVERED BY EMAIL

Ontario Energy Board P.O. Box 2319 26<sup>th</sup> Floor 2300 Yonge Street Toronto, ON M4P 1E4

Ms. Christine Long

Dear Ms. Long,

## RE: EB-2021-0002 Enbridge Gas Inc. 2022-2027 DSM Plan

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 approximately 220 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, pricing adjustments, and policies related to the production of greenhouse gases serve to materially impact the global competitiveness of the greenhouse vegetable sector.

The Ontario greenhouse sector has been 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 Enbridge Gas Inc. ("EGI") and greenhouse production in general is important to the Ontario economy.

With respect to this particular application, OGVG participated in the development of EGI's previous DSM Plan (then divided between Enbridge Gas Distribution and Union Gas Ltd.) and remains materially interested in all aspects of the scope, manner of implementation, and cost of EGI's DSM activity on behalf of ratepayers. OGVG's members are directly affected both by the effectiveness of EGI's DSM activities to the extent OGVG members are recipients of DSM programming, and the cost of EGI's DSM

activities on an annual basis as a component of EGI's rates.

As a participant in the proceeding it would be OGVG's intention to participate in all aspects of the process, including the interrogatory phase, any technical or settlement conferences, and the hearing process. At this stage of the process OGVG has no opinion on whether an oral or written hearing process is preferable.

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:

Aaron Coristine Science/Regulatory Affairs/Government Relations Ontario Greenhouse Vegetable Growers 32 Seneca Road, Leamington, Ontario N8H 5H7

Phone 519-564-4496

Email: a.coristine@ogvg.com

AND

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

Phone 416-767-1666

Email: mrb@mrb-law.com

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

Yours very truly,

Na

Michael R. Buonaguro