

MICHAEL R. BUONAGURO

Barrister and Solicitor

24 HUMBER TRAIL
TORONTO, ONTARIO, M6S 4C1
P: (416) 767-1666
F: (416) 767-1666
EMAIL: mrb@mrb-law.com

November 30, 2022

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

DELIVERED BY EMAIL

Dear Ms. Marconi,

RE: EB-2022-0200; Enbridge Gas Inc. 2024 Rate Application

We are writing on behalf of the Ontario Greenhouse Vegetable Growers ("OGVG") regarding the referenced application to request intervenor status in the proceeding.

The Ontario greenhouse vegetable sector is a major contributor to the Ontario economy, generating over \$1 billion in farm gate receipts year over year since 2019 and accounting for approximately 18,000 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, to generate both the heat and CO₂ that are directly used to cultivate crops. 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 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. In its recent application to increase the capacity on its Panhandle System Enbridge Gas Inc. ("EGI") noted the continued growth of greenhouse related load on its system, with EGI forecasting that by the winter of 2030/31 40% of the total firm demand in the Panhandle System Market will be from greenhouses (EB-2022-0200, Exhibit I.APPrO.6). OGVG members' natural gas consumption is important to EGI and greenhouse production in general is important to the Ontario economy.

With respect to this application, OGVG's members are directly interested in all aspects of the application. Greenhouse operations are critically reliant on reliable access to sources

of energy to maintain their crops throughout the year, and in particular access to natural gas provides greenhouse operators access to not only a heating fuel, but also a reliable and efficient source of CO₂. Accordingly, OGVG's members are, relatively speaking, uniquely interested in not only the immediate cost of natural gas service, but also the future viability and cost of natural gas service, which issues are raised throughout this application.

As a not-for-profit organization, OGVG does not have other funding sources to ensure it can retain 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.

In this context of this application OGVG notes that it has agreed to share counsel with another proposed intervenor, the Canadian Biogas Association. Assuming both interventions are approved the sharing of a single counsel will greatly assist in the efficient representation of both organizations.

OGVG notes that it proposes to participate in all aspects of the application process.

REPRESENTATION

If the intervention requested is granted, OGVG asks that further communications (in electronic form only) 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,

A handwritten signature in blue ink, appearing to be 'M. Buonaguro', with a stylized, cursive script.

Michael R. Buonaguro