

**From:** Ontario Energy Board <webmaster@oeb.ca>

**Sent:** Tuesday, January 14, 2025 12:24 PM

**To:** Office of the Registrar <Registrar@oeb.ca>

**Cc:** mrb@mrb-law.com

**Subject:** Intervention Form: EB-2024-0198 - Ontario Greenhouse Vegetable Growers (OGVG)

# Intervention Form

## Case Number:

EB-2024-0198

## Intervenor Name:

Ontario Greenhouse Vegetable Growers (OGVG)

## Mandate and Objectives:

Refer to the Frequent Intervenor Form below.

## Membership of the Intervenor and Constituency Represented:

Refer to the Frequent Intervenor Form below.

## Programs or Activities Carried Out by the Intervenor:

Refer to the Frequent Intervenor Form below.

## Governance Structure:

Refer to the Frequent Intervenor Form below.

## Representatives:

Refer to the Frequent Intervenor Form below. Refer to the Frequent Intervenor Form below.

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## **Other Contacts:**

Refer to the Frequent Intervenor Form below. Refer to the Frequent Intervenor Form below.  
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## **Frequent Intervenor Form:**

<https://www.rds.oeb.ca/CMWebDrawer/Record/879796/File/document>

## **OEB Proceedings:**

EB-2024-0111 Phase 2 EGI Application for 2024 Rates  
EB-2022-0200 Phase 1 EGI Application for 2024 Rates  
EB-2024-0125 EGI 2023 D/V Account Disposition  
EB-2022-0335 EGI IRP Pilot Projects  
EB-2022-0157 Panhandle Reinforcement Expansion Project LTC

OGVG has been approved as a funded intervenor in each of the applications for which it applied for intervenor status.

## **Issues:**

OGVG's members, greenhouse operations in southern Ontario, are large consumers of natural gas, making up a large number of EGI's contract rate customers, particularly in the franchise area formerly served by Union Gas Ltd.. Natural gas, used by growers not only for space heating but also for CO2 feedstock for plant growth, is a material cost to greenhouse operators. Accordingly efforts to reduce natural gas consumption are of great interest to

OGVG's members, who seek to participate directly in EGI's proposed DSM programming, as is the cost of DSM programming, which EGI proposes to recover from all of EGI's customers whether they receive DSM programming or not.

There does not appear to be a proposed issues list in the application as of yet. OGVG's participation will be focussed on the overall spending levels on DSM, the structure of that spending, and the specific programs offered to its members as part of the agricultural sector, which sector is included within EGI's proposed industrial sector program. More specifically OGVG intends to focus its intervention on the DSM structure and program offerings as they apply to the contract rate customers classes, as the bulk of OGVG's members are large, contract rate customers of EGI.

## **Policy Interests:**

OGVG's members are ratepayers of EGI's who are directly impacted by the cost of DSM programming and the effectiveness of DSM programming that is delivered to them.

## **Hearings:**

OGVG does not, at this time, have an opinion as the type of hearing that is appropriate.

## **Evidence:**

OGVG does not currently have plans to file evidence in this proceeding.

## **Coordination with Other Intervenors:**

OGVG employees counsel that specializes in proceedings before the Ontario Energy Board with experience in proceedings similar to this application where there are a number of interventions representing the full spectrum of customer groups served by EGI. Accordingly OGVG is comfortable in expressing its belief that to the extent there are common interests between OGVG's members and other intervenor groups it will be possible, through interaction between OGVG and other groups, to coordinate efforts with a view to ensuring the most efficient use of the OEB's time. OGVG, generally speaking, focusses on issues that in type and scope directly impact its members as large contract customers in southern Ontario that specifically use natural gas for both heating and CO2 production, leaving issues related to other groups, i.e. residential and smaller commercial and industrial general rate class customers, to be addressed largely by groups whose members take service from EGI in those rate classes. By way of example, OGVG expects that a large component of the proceeding will be focussed on the details of the residential class DSM program offerings put forward for approval by EGI; OGVG's interest in the details of those programs are minimal, such that OGVG will defer to other intervenors with respect to the details of those programs.

## **Cost Awards:**

OGVG is applying for cost award eligibility, and has been found cost award eligible in all the OEB proceedings for which it has applied for intervenor status in the more than 10 years that

it has been applying for intervenor status and cost award eligibility.

OGVG notes that, pursuant to section 3.03 a) of the Practice Direction on Cost Awards, OGVG directly represents the interest of ratepayers, specifically greenhouse operations that take service from EGI for natural gas service, mostly within the contract rate classes.

As a not-for-profit organization, OGVG does not have other funding sources to ensure experienced representation to participate in and assist the OEB with these 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.

## **Language Preference:**

English is preferred.