

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

March 7, 2025

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-2024-0198
Enbridge Gas Inc. Application for Multi-Year Natural Gas Demand Side Management Plan (2026-2030)

We are writing in response to the OEB's invitation to OGVG and IGUA to provide comments on the OEB's suggestion that OGVG and IGUA may be able to coordinate their efforts in the above-mentioned proceeding. Specifically, the OEB invited IGUA and OGVG to respond to the following suggestion:

The OEB finds that IGUA and OGVG have a substantial interest in the proceeding. The OEB also notes that they both appear to represent the interests of large consumers of natural gas and, as such, the OEB is considering coordinating their participation in this proceeding in the same manner as other groups are being asked to do so.

OGVG respectfully submits that, although both OGVG and IGUA notionally represent "large customers", relative to general service customers, it is not the case that the interest of their respective members are aligned such that they should be compelled to coordinate efforts in the manner suggested in procedural order #1.

OGVG notes that none of its members are also members of IGUA; the two organizations have distinct and separate memberships.

OGVG members are all greenhouse operators in southern Ontario, using natural gas for space heating, generating carbon dioxide as feedstock for their operations, and, increasingly, for generating onsite electricity; no greenhouse operators are members of IGUA. OGVG's approximately 170 members are "large" in the sense that they are almost all contract rate class customers; however, unlike IGUA's members, who take

service under two of EGI's largest two rate classes (T2, Rate 100), the vast majority of OGVG's members take service under EGI's much smaller M4, M5 and M7 contract rate classes, with 7 of OGVG's members taking service under the T1 class.¹ Accordingly OGVG and IGUA have memberships with distinctly different interests based on their respective members rate class composition.

This distinction is important as EGI's historical and proposed DSM framework recovers costs on a rate class by rate class basis; accordingly, OGVG's focus on the DSM framework is on how it affects M4, M5, M7, and T1 customers, whereas IGUA's focus, we are advised, is in how the DSM framework impacts the T2 and Rate 100 rate classes, which contain no greenhouse operators, including the unique proposition that IGUA's members may be able to opt out of DSM programming (and costs) altogether, an issue not relevant to OGVG's members. Even under EGI's proposed new rate classes in the EB-2025-0064 proceeding, OGVG's focus is on the impact on proposed new rate class E10, whereas IGUA's members will largely take service under proposed new rate class E20.

Furthermore, we note that the proposed DSM framework (and, in fact, the draft issues list) recognizes this distinction, in that the proposed DSM programming is characterized, for the contract rate classes, as being split between a proposed Industrial Program, which includes programming for the agricultural sector for contract customers within the M4, M5, M7 and T1 classes, and the "Large Volume Program", which, historically, has only included T2 and Rate 100 customers, neither of which have any greenhouse customers, and which, under EGI's proposal going forward, will specifically exclude greenhouse operations:

Rather, the proposed 2026-2030 Large Volume Program will be applicable to customers that meet the following eligibility criteria:

ii. A customer must be an industrial manufacturing facility, i.e. the primary activity of the facility is an industrial activity (excludes agriculture, greenhouse, institutional, and other non-industrial facilities) with contract accounts for unbundled or semi-unbundled services; (emphasis added)²

Accordingly, OGVG's and IGUA's memberships do not have the same interest in this proceeding. Whereas OGVG's interests are primarily in the "smaller" contract rate classes where most of its members reside, with a specific interest in the programming offered to greenhouse operations through the proposed Industrial Program, IGUA's interest is in the "larger" contract rate classes where its members reside, with a specific interest in the proposed Large Volume Program which, as noted, excludes greenhouse

¹ See EB-2022-0200, Exhibit I.3.2-OGVG-4 Attachment 1 for a breakdown of contract level greenhouse customers by rate class as of March 8, 2023. OGVG notes that even within EGI's proposed new rate class structure in EB-2025-0064, the vast majority of OGVG's members would take service under proposed Rate E10, while most of IGUA's members would take service under proposed Rate E20.

² EB-2024-0198 Exhibit E Tab 6 Schedule 1 pages 6-7.

operations. OGVG does not anticipate exploring issues related to the T2, Rate 100, or (proposed) E20 rate classes or the details of the Large Volume Program, both of which are issues squarely in the purview of IGUA and its members; OGVG's interest is limited to the proposed DSM framework insofar as it impacts rate classes M4, M5, M7 and T1, and in the design and delivery of the proposed Industrial Program to greenhouse operations within those rate classes.

Lastly, we would respectfully suggest that both OGVG and IGUA have demonstrated efficient, focussed, and non-duplicative participation in multiple proceedings before the OEB. OGVG and IGUA, we respectfully submit, routinely consult with each other and other intervenors on issues of common interest with a view to reducing duplicative efforts and to, where feasible, align positions. OGVG expects to continue to do so in this proceeding, with IGUA and other intervenors, as appropriate.

For all these reasons OGVG respectfully submits that it would not be appropriate to compel OGVG and IGUA to formally coordinate their interventions in this proceeding. In OGVG's view the two organizations have disparate interests in the specifics of the application based on the rate classes within which their respective members reside and the programming that is proposed to be provided to each distinct group of customers.

Yours very truly,



Michael R. Buonaguro